

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT AND MITIGATED NEGATIVE DECLARATION

Project No. 600824
Addendum to EIR DEP No. 35-0385/SCH No. 96021001
and MND LDR No. 96-7919

SUBJECT: SEABREEZE SENIOR LIVING: An AMENDMENT to the Carmel Valley Community Plan and Carmel Valley Neighborhoods 4, 5, & 6 (Carmel Del Mar) Precise Plan to change the existing land use designation from Equestrian Facility to Residential Care Facility; a CONDITIONAL USE PERMIT (CUP) to allow for a residential care facility; a PLANNED DEVELOPMENT PERMIT (PDP) to allow for a deviation to lot coverage (17.5 percent where 10 percent is allowed); and a SITE DEVELOPMENT PERMIT (SDP) due to the presence of on- and off-site Environmentally Sensitive Lands (ESL) (Steep slopes and Biological Resources) and due to an amendment to the Carmel Valley Planned District (CVPD) Development Permit and Resource Protection Ordinance (RPO) Permit No. 96-7919 to demolish an existing equestrian facility and construct a senior residential care facility providing up to 128 residences. The proposed senior residential care facility comprises of a two-story main building and five detached "casitas" with paired (duplex) residences. The main building encompasses an interior area of approximately 118,342 square-feet. This building would include assisted living units and memory care units. Apart from this building, at the southern portion of the project site, five single-story duplex casitas for independent living, consisting of approximately 17,260 square feet of interior area, are proposed. Parking would be accommodated with a combination of 82 surface parking spaces and 10 spaces in private garages (within the casitas), for a total of 92 parking spaces. Two motorcycle stalls, one loading space, and six bicycle spaces would also be provided. Various site improvements and associated resident amenities would also be constructed in addition to hardscape and landscape. Resident amenities could include activity rooms, fitness room and pool, and a beauty parlor. The 8.78-net acre (10.12 gross acres) site is located at 5720 Old Carmel Valley Road. A portion of the project site is designated Equestrian Facility per the Carmel Valley Neighborhoods 4, 5, & 6 Precise Plan and is designated Park, Open Space, and Recreation in the City of San Diego General Plan. Slopes along the western site perimeter are designated Open Space. The majority of the project site is zoned AR-1-1. The access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone. (LEGAL DESCRIPTION: Lots 153, 155 and 156 of Seabreeze Farms in the City of San Diego, County of San Diego, State of California, according to map thereof No. 14007, filed in the Office of the County Recorder of San Diego on July 21, 2000.) Applicant: SRM Carmel Valley LP.

I. SUMMARY OF PROPOSED PROJECT

The Seabreeze Senior Living project (project) site is located within the Carmel Valley community of the City of San Diego and is subject to the General Plan, the Carmel Valley Community Plan, and, more specifically, the Carmel Valley Neighborhoods 4, 5, & 6 Precise Plan. The Precise Plan was adopted in 1990. The Precise Plan provides the specific design criteria for this project site and the anticipated buildout of remaining vacant parcels within Carmel Del Mar Neighborhoods 4, 5, & 6 to service this community.

The project involves a COMMUNITY PLAN AMENDMENT (CPA), a CONDITIONAL USE PERMIT (CUP), a PLANNED DEVELOPMENT PERMIT (PDP), and a SITE DEVELOPMENT PERMIT (SDP). The CPA would specifically amend the Carmel Valley Neighborhoods 4, 5, & 6 Precise Plan to re-designate the project site from the existing Equestrian Facility land use to Residential Care Facility land use. The CPA incorporates map and text changes to the Precise Plan reflecting the land use change. The portion of the site designated as Open Space would remain Open Space. The CUP action provides for the development of a Residential Care Facility at the project site. The PDP action is required in order to process a deviation to lot coverage at the project site (17.5 percent where 10 percent is allowed). The SDP action is required due to the presence of on- and off-site ESL (Steep Hillside and Biological Resources) at the project site and for the processing of an amendment to the Carmel Valley Planned District (CVPD) Development Permit and Resource Protection Ordinance (RPO) Permit No. 96-7919.

The project proposes the redevelopment of an existing equestrian facility as a senior Residential Care Facility. The project would encompass the demolition of the existing equestrian facility and the construction of a senior residential care facility providing up to 118 residences for assisted living and memory care in the main building and five two-bedroom duplex casitas with kitchens (10 dwelling units) in its place. (See Figure 1, *Site Plan*.) A two-story main building (at approximately 118,342 square feet in area) would be located in the northern portion of the project site. This building would include assisted living units and memory care units. Five single-story duplex casitas for independent living would be located in the southern portion of the project site, totaling approximately 17,260 square feet of interior area. Each duplex casita would include a two-bedroom/two-bathroom unit, one single-car garage, laundry facility space, kitchen, and outdoor space. The main building would include indoor residential amenities such as dining areas, activity rooms, a theater/chapel, fitness room, and/or beauty parlor and other resident-supportive amenities to serve residents of the facility. Outdoor residential amenities could include such features as a dining patio area, a large central open courtyard with additional outdoor courtyards on the perimeter of the main building, scenic overlooks, fitness pool, and internal walking trails.

Per recently adopted State law AB 3098 which went into effect on January 1, 2019, senior residential care facilities must implement additional measures for emergency preparedness. To comply with this law, the project would include an emergency back-up generator. The generator would generally be located at the north side of the main building, proximate to the loading dock.

Additionally, the project would provide for a connection to the off-site regional trail and improvements to the public trail system for the section of the trail that crosses the project site. This trail section would be improved with a natural soil material in accordance with Appendix K of the Consultants Guide to Park Design and Development. (See Figure 2, *Pedestrian Circulation Exhibit*.)

Also, included as part of a resident's amenity package is a private shuttle service. It is anticipated that a 14-passenger van would serve the project and would operate primarily during daytime hours (generally between 9:00 AM and 5:00 PM) with occasional service provided outside this time period for special events/activities, as needed. The shuttle service would include regularly scheduled outings to local/regional events and activities such as concerts, sporting events, shopping, festivals, and church services. Shuttle arrangements can also be made for grocery shopping, doctor's visits, or other individual errands and activities.

Parking would be provided in a combination of individual garages (for duplex casita units) and surface parking (for the main building). A total of 92 parking spaces are proposed, 82 surface spaces [three of which would be designated carpool/zero emission parking, three electric vehicle charging stations (two ready for use), three accessible parking, two van accessible parking], two motorcycle parking, one loading space, and 10 parking spaces would be provided for the casitas (one garage space per unit). Three short-term bicycle parking spaces and three long-term bicycle parking spaces would also be provided. All parking would be provided on-site.

The project landscaping has been reviewed by City Landscape staff and would comply with all applicable City of San Diego Landscape ordinances and standards, including Sections 142.0403(b)5 and 142.0412(f) of the Land Development Code (LDC). Relevant landscape standards include street yard, remaining yard, and vehicular use area planting; revegetation/erosion control; street tree screening; water conservation calculation requirements; landscape and irrigation construction; landscape maintenance; and establishment of a Brush Management Program. Drainage would be directed into appropriate storm drain systems designated to carry surface runoff, which has been reviewed and accepted by City Engineering staff. (See Figure 3, *Landscape Concept Plan*.)

The project would require the grading of approximately 241,809 square feet of soil on-site and 8,621 square feet off-site. Earthwork would require 6,342 cubic yards of cut with a maximum depth of cut at eight feet and 11,683 cubic yards of fill with a maximum fill depth of seven feet. The maximum height of fill slopes would be 20 feet; the maximum height of cut slopes would be one foot. (See Figure 4, *Grading Plan*.)

II. ENVIRONMENTAL SETTING

The 8.78-net acre (10.12 gross acre) project site is located at 5720 Old Carmel Valley Road, west of Old Carmel Valley Road, south of Del Mar Heights Road, and north of State Route (SR) 56 (see Figure 5, *Project Location Map*). Ingress and egress to the project site would be provided from Old Carmel Valley Road. Regional access to the project site is generally provided by SR-56 and Del Mar Heights Road.

The topography of the project site includes a relatively flat development area (8.78 acres) with a westward downslope of approximately 1.34 acres that trends into Bell Canyon. The project site was previously graded and is currently developed with an equestrian facility, which includes stables, pastures, riding arenas, offices, and vehicular parking. Existing on-site vegetation within the proposed development area footprint consists mainly of non-native ornamental plants and disturbed areas with naturalized landscaping occurring at the westward slope. The project site's eastern border is characterized with a manufactured slope, which ranges from approximately 10 feet in height in the southern end of the slope to approximately 70 feet in height at the north end. Off-site single-family residences are located immediately east of the project site and are set back from the manufactured slope. Single-family residences are also located south of the project site, and Cathedral Catholic High School is located to the north. Designated Open Space land use including pastures, a sloped area, and single-family residential development designated as Single Family land use are located to the west of the project site (see Figure 6, *Aerial Photograph*). The project site is located within a developed area served by existing public services and utilities.

III. SUMMARY OF ORIGINAL PROJECT

The project is part of the approved Seabreeze Farms project. The Seabreeze Farms project was approved by the San Diego Planning Commission in 1996, with an amendment subsequently adopted by City Council in 1999. The Seabreeze Farms project area covers approximately 72 acres, generally bounded by SR 56 on the south, Old Carmel Valley Road on the east, Del Mar Heights Road to the north, and Carmel Knolls Road and Seagrove Street to the west in the Carmel Valley Community Plan area.

The Seabreeze Farms EIR (DEP No. 35-0385, SCH No. 96021001) was certified by the San Diego City Council on July 30, 1996 via Resolution No. R-287703. The Seabreeze Farms project involved Amendments to the City's Progress Guide and General Plan, the North City Future Urbanizing Area (NCFUA) Framework Plan, Carmel Valley

Community Plan, and the Carmel Valley Neighborhoods 4, 5, and 6 Precise Plan for annexation of Seabreeze Farms into Neighborhood 4 of the Carmel Valley Community Plan and to establish land use designations and policies for the Seabreeze Farms property. The Seabreeze Farms EIR evaluated the land use designations and policies to allow for the future development of 300 residential dwelling units (250 single-family and 50 multi-family units) and an equestrian center on a 72-acre project site.

In 1999, the City Council approved the Seabreeze Farms project (LDR No. 96-7919) and adopted a Mitigated Negative Declaration (MND) on March 5, 1999 via Resolution No. R-292173. The 1999 Seabreeze Farms project involved amendments to the Carmel Valley Community Plan and the City's Progress Guide and General Plan. Additionally, a Carmel Valley Planned District Development Permit; Vesting Tentative Map; Resource Protection Ordinance; Carmel Valley Neighborhoods 4, 5, and 6 Precise Plan Amendment; and Rezone were required to allow the development of 185 residential dwelling units, an equestrian village, and a designated 25-acres open space area.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Seabreeze Farms EIR (DEP No. 35-0385, SCH No. 96021001). Subsequent to the certification of the EIR, the City prepared and adopted the Seabreeze Farms MND (LDR No. 96-7919). Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

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

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a

result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the Seabreeze Farms EIR (DEP No. 35-0385, SCH No. 96021001) and the Seabreeze Farms MND (LDR No. 96-7919) relative to the project.

Impact Analysis Summary

Seabreeze Farms EIR

The Seabreeze Farms EIR analyzed the following issue areas:

- Land Use
- Transportation/Traffic Circulation
- Biological Resources
- Hydrology/Water Quality
- Landform Alteration/Visual Quality
- Cultural Resources
- Air Quality
- Geology/Soils
- Agriculture/Natural Resources
- Paleontology
- Noise
- Public Facilities and Services
- Public Health and Safety

The EIR found that the project would result in significant unmitigated cumulative environmental impacts associated with hydrology/water quality, landform alteration/visual quality, and agriculture. Additionally, significant but mitigated impacts were identified for paleontology, transportation, biology, hydrology/water quality, landform alteration/visual quality, cultural resources, air quality, geology/soils, noise, public facilities and services, and public health and safety. A summary of project impacts in relation to the 1996 Seabreeze Farms EIR is provided in Table 1, *Impact Assessment Summary: Seabreeze Farms EIR*, below.

Table 1. Impact Assessment Summary: Seabreeze Farms EIR

Environmental Issue	1996 EIR Finding	Project	New Mitigation?	Project Resultant Impact
Land Use	Less than significant	No new impacts	No	Less than significant
Transportation/Traffic Circulation	Significant and fully mitigated	No new impacts	No	Less than significant
Biological Resources	Significant and fully mitigated	No new impacts	No	Less than significant
Hydrology/Water Quality	Significant and partially mitigated	No new impacts	No	Less than significant
Landform Alteration/Visual Quality	Significant and partially mitigated	No new impacts	No	Less than significant
Cultural Resources	Significant and fully mitigated	No new impacts	No	Less than significant
Air Quality	Significant and fully mitigated	No new impacts	No	Less than significant
Geology/Soils	Significant and fully mitigated	No new impacts	No	Less than significant
Agriculture/Natural Resources	Significant and partially mitigated	No new impacts	No	Less than significant

Environmental Issue	1996 EIR Finding	Project	New Mitigation?	Project Resultant Impact
Paleontology	Significant and fully mitigated	No new impacts	No	Less than significant
Noise	Significant and fully mitigated	No new impacts	No	Less than significant
Public Services and Facilities	Significant and fully mitigated	No new impacts	No	Less than significant
Public Health and Safety	Significant and fully mitigated	No new impacts	No	Less than significant

Seabreeze Farms MND

The Seabreeze Farms MND analyzed the following issue areas:

- Cultural Resources
- Landform Alterations/Visual Quality
- Transportation/Traffic Circulation
- Land Use
- Biological Resources
- Noise
- Geology/Soils
- Paleontology
- Air Quality
- Hydrology/Water Quality
- Public Facilities and Services
- Public Health and Safety

The MND found that the project would not result in any significant environmental impacts associated with the project that would be mitigated to below a level of significance with implementation of required mitigation measures. A summary of project impacts in relation to the 1999 Seabreeze Farms MND is provided in Table 2, *Impact Assessment Summary: Seabreeze Farms MND*.

Table 2. Impact Assessment Summary: Seabreeze Farms MND

Environmental Issue	1999 MND Finding	Project	New Mitigation?	Project Resultant Impact
Cultural Resources	Less than significant	No new impacts	No	Less than significant
Landform Alteration/Visual Quality	Significant and fully mitigated	No new impacts	No	Less than significant
Transportation/Traffic Circulation	Significant and fully mitigated	No new impacts	No	Less than significant
Land Use	Significant and fully mitigated	No new impacts	No	Less than significant
Biological Resources	Significant and fully mitigated	No new impacts	No	Less than significant
Hydrology/Water Quality	Significant and fully mitigated	No new impacts	No	Less than significant
Air Quality	Significant and fully mitigated	No new impacts	No	Less than significant
Noise	Significant and fully mitigated	No new impacts	No	Less than significant
Geology and Soils	Significant and fully mitigated	No new impacts	No	Less than significant
Paleontology	Significant and fully mitigated	No new impacts	No	Less than significant
Public Facilities and Services	Significant and fully mitigated	No new impacts	No	Less than significant
Public Health and Safety	Significant and fully mitigated	No new impacts	No	Less than significant

This Addendum includes the subsequent impact analysis to demonstrate that environmental impacts associated with the Seabreeze Senior Living project are consistent with or not greater than the impacts disclosed in the previously certified Seabreeze Farms EIR and the adopted Seabreeze Farms MND. The following includes the environmental issues analyzed in detail in the EIR and MND, as well as the project-specific analysis for the Seabreeze Senior Living project pursuant to CEQA. The analysis in this document evaluates the adequacy of the original EIR and the subsequent MND relative to the project. The following analysis documents that the proposed modification and/or refinements would not cause new or more severe significant impacts than those identified in the original EIR and the subsequent MND.

Land Use

Seabreeze Farms EIR

Potential impacts to land use were analyzed in Section IV-A of the Seabreeze Farms EIR. The EIR concluded that the Seabreeze Farms project would be consistent with regard to land use in the following areas:

Resource Protection Ordinance. The Seabreeze Farms project was considered consistent with the intent of the Resource Protection Ordinance, which was in effect at the time the Seabreeze Farms project was processed.¹ Impact would be less than significant.

Carmel Valley Community Plan and Neighborhoods 4, 5 & 6 Precise Plan. The Seabreeze Farms project was determined to be compatible with the intent of the Carmel Valley Community Plan and the Carmel Valley Neighborhoods 4, 5 & 6 Precise Plan, as well as the existing and future surrounding land uses. Impact would be less than significant.

The EIR concluded that the Seabreeze Farms project presented a land use inconsistency in the following areas:

Conversion of agricultural land. The Seabreeze Farms project resulted in converting agricultural land, considered to be of Statewide importance, to urban uses. This land use change was considered to be an inconsistency with the goal of the Progress Guide and General Plan to retain premium agricultural lands in agricultural usage. This inconsistency was considered cumulatively significant and unmitigated. The only mitigation for this cumulative impact would have been through adoption of the No Project/No Action alternative which was not selected. As part of its consideration of the Seabreeze Farms project and certification of the associated EIR, the City Council adopted a Statement of Overriding Considerations addressing this cumulatively significant and unmitigated land use impact.

Intensification of the land use. The land uses associated with the Seabreeze Farms project represented an inconsistency with adopted land use plans in that a lower density residential designation was being replaced with higher residential land use intensity, an equestrian center, and open space. Seabreeze Farms' land uses were analyzed against the goals of the Framework Plan. Preservation of open space was not considered inconsistent, as the Framework Plan recommended preservation of significant landforms through the Subarea Planning process. Additionally, the Framework Plan called for the preservation of topographical features and biological diversity, which was ensured through the preservation of open space on the western side of the Seabreeze Farms property (about 25 percent of the property). The Seabreeze Farms project resulted in an intensity of residential development that was higher than that of the adopted Framework Plan [250 units at 5 to 10 dwelling units per acre (du/ac) and 50 units at 13 to 22 du/ac where 178 units at a density of 1.6 with 4 du/ac was previously assumed]. Although there was an inconsistency regarding the densities associated with Seabreeze Farms and those of the adopted land use plans, adverse indirect impacts that could be associated with higher densities were determined to not be associated with Seabreeze Farms due to adequate mitigation of density-based facilities and services. Because the equestrian use was a continuation of the existing land use, and the open space was a desired component of the Framework Plan goals, this inconsistency was not considered significant.

¹ The Resource Protection Ordinance has since been superseded by and incorporated into the Environmentally Sensitive Lands Regulations adopted with the Land Development Code Update in 2000.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed Land Use within its Initial Study Checklist. The MND concluded that project development would place residential lots adjacent to conserved habitat/open space area within the southwestern portion of the project site. Specifically, this refers to Lots 68 to 76, or those lots located to the west of what is currently Rider Place and Coach Lane. Development within the equestrian village of Seabreeze Farms would abut conserved habitat/open space area to the west, as well. Because the increase of artificial light sources at night associated with residential and equestrian uses could adversely affect nocturnal wildlife activity within the open space areas, mitigation was required to minimize such lighting impacts. Mitigation measures required the selective placement, shielding, and direction of all lighting from open space areas. Illumination from homes abutting open space required screening with vegetation. Large, spotlight-type lighting was prohibited. These measures were included in Mitigation Measure 3. Implementation of Mitigation Measure 3 would reduce land use impacts to below a level of significance. MND Mitigation Measure 3 was implemented with development of the Seabreeze Farms project.

Proposed Project

The Seabreeze Senior Living project would construct a senior residential care facility comprising of up to 128 residences on the 8.78-net acre (10.12-gross acre) site currently occupied by the Seabreeze Farms equestrian facility. The surrounding area has been developed under the permits related to the Seabreeze Farms EIR and MND. This is predominantly single-family residences and a pocket of multi-family housing. The proposed project is consistent with the underlying zone, as a residential care facility is a use allowed within the AR-1-1 zone with application of a CUP. Although the access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone, the area where development is proposed lies within the AR-1-1 zone.

The project requires an amendment to the Carmel Valley Neighborhoods 4, 5, and 6 Precise Plan to modify the land use designation on a portion of the site from Equestrian Facility to Residential Care Facility and to update map and text changes to reflect the land use change. The land use within the portion of the site currently designated as Open Space would not be modified. The Precise Plan Amendment would not result in any significant environmental impacts as further discussed and analyzed within this Addendum. Development within the surrounding community is low- to medium-density residential in character and varies from five du/ac in adjacent single-family housing, to 15 du/ac in nearby multi-family housing, and 22 du/ac as multifamily housing further east. If the proposed project were a multi-family development that included 128 dwelling units, rather than a mix of residences/suites and dwelling units, the resulting overall comparable density would be 15 dwelling units per net acre, which is compatible with the density of residential developments in the surrounding neighborhoods.

The Precise Plan Amendment would allow for a residential care facility to occur on the project site by replacing the existing Equestrian Facility land use with the project's proposed Residential Care Facility land use. The Precise Plan contains no language specific to the preservation of equestrian uses on the site. The discontinuation of the equestrian facility would not have an adverse effect on the Community Plan land use, as other equestrian uses are located within the community and adjacent areas. For example, within the Carmel Valley Community Plan area, equestrian facilities are located approximately 3.5 miles south of the project site (The Riding Club, Carmel Valley Rancho & Ryckman Equestrian, and South Coast Equestrian). The Silver Spur Riding School is located approximately two miles east of the project site in the adjacent Torrey Highlands community. Approximately four to five miles northwest of the project site, Rancho El Camino Equestrian and Flower Hill Farms are located adjacent to Old El Camino Real; and Concord Equestrian Center and the San Diego Polo Fields are located along Via de la Valle. KDB Training Stable/Fairbanks Riding Club is located approximately five miles north of the project site within Fairbanks Ranch. Equestrian and nature trails occur south and northwest of the project site, and pasture land and trails exist immediately west of the project site.

The CUP would not result in any significant environmental impacts. The majority of the project site is zoned AR-1-1. The access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone. The project proposes development of a Residential Care Facility on the portion of the site zoned AR-1-1. A residential care facility is an allowable use within the AR-1-1 zone with

application of a CUP. Although the access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone, the area where development is proposed lies within the AR-1-1 zone. By including the CUP with the project application, the project would be consistent with the regulations of the Land Development Code relative to this separately regulated use within the AR-1-1 zone.

The project also includes a Site Development Permit for an amendment to the Carmel Valley Planned District Development Permit, Resource Protection Ordinance Permit No. 96-7919, and for Environmentally Sensitive Lands in the form of the presence of sensitive biological resources and steep slopes that occur on the project site. Application of the Site Development Permit and Mitigation Measure 1, as described further in detail under *Biological Resources*, would ensure that impacts relative to biological resources and steep slopes are less than significant.

Relative to conversion of agricultural land to an urbanized use, all agricultural land that was within the Seabreeze Farms project boundaries was discontinued with implementation of the Seabreeze Farms project. The Seabreeze Farms site was developed with residential and equestrian uses, and no identified lands remain available for agricultural production. Provided this background, the redevelopment of the equestrian facility to a senior residential care facility would have no impact on agricultural land.

The land use proposed with the Seabreeze Senior Living project represents an inconsistency with adopted land use plans in that a change in land use (in the form of a Precise Plan Amendment) is required to replace the existing equestrian facility land use designation with the residential care facility land use. This change in land use does not represent a significant impact due to the relative consistency between the project and the surrounding land uses. The project would propose development that is residential in use and character. The portion of the site identified as open space will remain as open space. As stated above, the adjacent and surrounding neighborhood is characterized by residential uses. The density of existing residential development ranges between five du/ac to 22 du/ac. The project would result in an equivalent of approximately 15 du/ac. Thus, the project would be compatible with adjacent development. Equestrian uses, in the form of pastures, trails, and open space, would remain west of the project site. Residential equivalent use, which a residential care facility is most representative of, are proposed. Thus, the project would be consistent with remaining equestrian and existing residential uses. As mentioned above, numerous equestrian facilities are located within a five-mile radius of the project site.

A residential care facility is a form of attached housing often similar to a multi-family housing development. For example, the project would include a two-story main building and five single-story duplex casitas. Massing would be articulated with offsetting planes to minimize the appearance of longer elevations, two-story architectural volumes and vertical elements, and courtyards. Duplex casitas would appear as single-story with a size less than that of the surrounding two-story single-family housing. The project would have a density equivalent of approximately 15 du/ac, which would be consistent with the Seabreeze Farms multi-family housing component (known as Long Acres Apartments at Seabreeze Farms). Additionally, a continuation of equestrian uses is accommodated in the areas immediately adjacent to the project site in the form of pastures, existing trails, and open space to the south and west of the site. The open space remains as a desired component of the Framework Plan policies. Therefore, the project would not result in a significant land use impact with regard to the proposed change in land use from equestrian to residential care facility.

Relative to secondary land use impacts related to lighting as identified in the Seabreeze Farms MND, the project would be required to comply with the City's Outdoor Lighting Regulation (San Diego Municipal Code Section 142.0740). Adherence to this code section would avoid any potential lighting impacts and no new mitigation is required. Section 1.4.3 of the City's Subarea Plan outlines the requirements to address indirect effects related to Drainage and Toxics, Lighting, Noise, Public Access, Invasive Plant Species, Brush Management, and Grading/Land Development. The project site is not within or adjacent to the Multi-Habitat Preservation Area (MHPA). The guidelines regarding development adjacent to the MHPA would not apply. No significant land use impacts would result.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND. The project would not result in any new significant land use impacts or a substantial increase in the severity of land use impacts from those described in the EIR or MND.

Transportation/Traffic Circulation

Seabreeze Farms EIR

Transportation/Traffic Circulation is addressed in Section IV-B of the Seabreeze Farms EIR. Cumulative vehicular traffic conditions were analyzed under buildout conditions incorporating Seabreeze Farms project traffic into the SANDAG Horizon Year 2015 Series VIII regional vehicle traffic model. Buildout conditions for the region required a number of traffic improvements in the North City Future Urbanizing Area, within which the Seabreeze Farms site is located. These improvements included facilities such as construction of SR 56 and dual freeway on Interstate- (I-)5 and the I-5/SR 56 interchange northbound connector. In June 2017, Caltrans completed and released the Final EIR for the I-5/SR 56 Interchange Project and selected the Phased Connectors Alternative as the Preferred Alternative. This project is not yet funded through final design and construction. Once funding is identified, the project could be built in phases beginning with the addition of one general purpose lane on SR 56 in each direction between El Camino Real and Carmel Country Road. Project phasing would also include the southbound I-5 to eastbound SR 56 and westbound SR 56 to northbound I-5 connector ramps. The anticipated schedule for completing the freeway improvements is unknown.

The EIR concluded that the Seabreeze Farms project would contribute a relatively minor amount of traffic to cumulative traffic conditions, resulting in a less than significant impact. Additionally, the EIR concluded that the associated plan amendment would not have a significant impact on the ability of Subarea III, within which the site is located, to provide the road network required to support the Framework Plan density envisioned for this area. Adverse impacts on Neighborhood 4 and the remainder of Carmel Valley were determined to be less than significant from a cumulative traffic impact perspective.

Section IV-B of the Seabreeze Farms EIR included an interim traffic analysis that contained two pre-buildout scenarios: the "Horseshoe Alternative" and the "SR-56 Expressway Alternative". The "Horseshoe Alternative" included an east/west route through the North City Future Urbanizing Area via SR 56 and Carmel Valley Road. The "SR 56 Expressway Alternative" assumed a continuous facility between Black Mountain Road and Carmel Country Road. The EIR concluded that the impacts for the two interim alternatives indicated little change in the Level of Service (LOS) between the "without project" and "with project" scenarios.

The contribution of Seabreeze Farms traffic (1.7 percent) to the cumulative traffic impact at the I-5 interchanges remained below the City's threshold for significance at that time (two percent), and thus, the Seabreeze Farms EIR concluded that the project would not have a significant impact. A mitigation measure (Mitigation Measure IV-B.1) was included in the Seabreeze Farms EIR to ensure that the phasing plan and traffic improvements required to keep the impact below a level of significance were implemented. This mitigation measure was satisfied with the development of Seabreeze Farms project.

Seabreeze Farms MND

As identified within the Seabreeze Farms MND, a revised traffic analysis was prepared by Kimley-Horn and Associates, Inc. (December 1998), which indicated that all studied street segments (i.e., Carmel Canyon Road, between Del Mar Heights Road and Carmel Knolls Drive and Carmel Knolls Drive, between Carmel Canyon Road and Ashley Falls Drive, east of Ashley Falls Drive, and west of Seabreeze Farms) and the Carmel Canyon Road/Carmel Knolls Drive intersection will operate at LOS C upon area buildout. That traffic analysis also indicated that there was excess capacity to accommodate project-related traffic without causing LOS to decline below the City's minimum performance standard of LOS D.

There were public concerns with project traffic contributions and noise generated by traffic. The project addressed and analyzed these issues in the Seabreeze Farms MND. Relative to traffic, to mitigate these public concerns, the

installation of a traffic signal at the intersection of Del Mar Heights Road and Seagrove Drive was a requirement of the project, as well as payment of a fair contribution for the future construction of Del Mar Heights Road from Carmel Valley Road/Camino Santa Fe to the Carmel Valley community boundary. These mitigation measures were contained within Mitigation Measures 1 and 2 for the project. Relative to traffic-generated noise, the MND concluded that with implementation of the identified mitigation measures, project impacts to transportation, traffic circulation, and traffic-generated noise would be reduced to below a level of significance. Mitigation Measures IV-B.1, 1, and 2 were implemented with development of Seabreeze Farms and other projects in the community.

Proposed Project

A *Traffic Impact Analysis* (TIA) was prepared for the Seabreeze Senior Living project by Linscott, Law and Greenspan, Engineers (December 19, 2018). The TIA analyzed the demolition of the existing equestrian facility and construction of a senior residential care facility, providing up to 128 units including assisted living units and memory care units in a main building, and five single-story duplex casitas for independent living would be located in the southern portion of the project site. Vehicular access to the project site would remain via a private drive off Old Carmel Valley Road, as it exists today. The project proposes construction of a five-foot wide meandering concrete sidewalk from Old Carmel Valley Road to the project's building entrance.

Included as part of a resident's amenity package is a private shuttle service. It is anticipated that a 14-passenger van would serve the project and would operate primarily during daytime hours (generally between 9:00 AM and 5:00 PM) with occasional service provided outside this time period for special events/activities, as needed. The shuttle service would include regularly scheduled outings to local/regional events and activities such as concerts, sporting events, shopping, festivals, and church services. Shuttle arrangements can also be made for grocery shopping, doctor's visits, or other individual errands and activities.

No trip credits were taken for the existing equestrian land use nor for the shuttle service to provide a conservative analysis. The project is anticipated to generate 394 average daily trips (ADT), with a total of 12 trips during the AM peak hour (7 inbound/5 outbound trips) and 31 total trips during PM peak hour (17 inbound/14 outbound).

Near-term conditions represent the Opening Year anticipated for the Project, which was analyzed as 2019. Eleven projects were identified for inclusion in the analysis using the City's Open DSD website. These projects were selected based on the assumption they would be constructed and generating traffic in the study area vicinity at the opening year of the proposed Project. Year 2050 conditions assume the on-the-ground street network in the study area vicinity. Analysis was conducted for three conditions including the project: Existing + Project, Near Term (Opening Year 2019) + Project, and Horizon Year 2050 + Project.

With the addition of project traffic to existing conditions, all intersections and street segments were calculated to continue to operate at LOS D or better, with the exception of Del Mar Heights Road/Carmel Valley Road, which operates at LOS F. Based on City of San Diego significance criteria, no significant direct impacts were calculated in the Existing + Project scenario as shown Table 3, *Existing + Project Intersection Operations*, and Table 4, *Existing + Project Street Segment Operations*.

Table 3. Existing + Project Intersection Operations

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Delay Δ^c	Sig?
			Delay ^a	LOS ^b	Delay	LOS		
1. Del Mar Heights Rd/ Carmel Canyon Rd	Signal	AM	26.7	C	26.7	C	0.0	No
		PM	27.9	C	27.9	C	0.0	
2. Del Mar Heights Rd/ Seagrove St	Signal	AM	7.1	A	7.3	A	0.2	No
		PM	5.6	A	5.9	A	0.3	
3. Del Mar Heights Rd/ Old Carmel Valley Rd	Signal	AM	47.7	D	48.2	D	0.5	No
		PM	23.3	C	25.3	C	2.0	

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Delay Δ^c	Sig?
			Delay ^a	LOS ^b	Delay	LOS		
4. Del Mar Heights Rd/ Carmel Valley Rd	Signal	AM	90.7	F	91.1	F	0.4	No
		PM	96.3	F	96.8	F	0.5	
5. Carmel Valley Rd/ SR 56 WB Ramps	Signal	AM	40.1	D	41.3	D	1.2	No
		PM	24.6	C	25.1	C	0.5	
6. Carmel Valley Rd/ SR 56 EB Ramps	Signal	AM	41.3	D	41.4	D	0.1	No
		PM	52.3	D	52.6	D	0.3	

Footnotes:

- Average delay expressed in seconds per vehicle.
- Level of Service.
- Δ denotes the increase in delay due to Project.

General Notes

- Sig = Significant impact, yes or no.

Table 4. Existing + Project Street Segment Operations

Intersection	Existing Capacity (LOS E) ^a	Existing			Existing + Project			Delay Δ^c	Sig?
		ADT ^b	LOS ^b	V/C ^d	ADT	LOS	V/C		
Del Mar Heights Road									
1. Lansdale Dr to Carmel Canyon Rd	50,000	20,500	B	0.410	20,591	B	0.412	0.002	No
2. Carmel Canyon Rd to Seagrove St	50,000	23,660	B	0.473	23,759	B	0.475	0.002	No
3. Seagrove St to Old Carmel Valley Rd ^f	45,000	22,610	B	0.502	22,709	B	0.505	0.003	No
4. Old Carmel Valley Rd to Carmel Valley Rd	40,000	25,060	C	0.627	25,356	C	0.634	0.007	No
Old Carmel Valley Road									
5. Del Mar Heights Rd to Project Access	10,000	5,580	C	0.558	5,974	C	0.597	0.039	No
Carmel Valley Road									
6. Del Mar Heights Rd to SR 56	40,000	31,660	D	0.792	31,917	D	0.798	0.006	No

Footnotes:

- Capacities based on City of San Diego Roadway Classification & LOS table.
- Average Daily Traffic.
- Level of Service.
- Volume to Capacity Ratio.
- Δ denotes a Project-induced increase in the Volume to Capacity ratio.
- Del Mar Heights Road from Seagrove Street to Old Carmel Valley Road currently provides three lanes in the westbound direction and two lanes eastbound which translates to an increased capacity of 45,000 ADT.

General Notes

- Sig = Significant impact, yes or no.

In the Near Term + Project conditions, all street segments were calculated to operate at LOS D or better with the exception of Carmel Valley Road (Del Mar Heights Road to SR 56), which operates at LOS F. Because the change in volume to capacity ratio (V/C) is less than 0.01, no significant direct impacts would occur. Intersections were calculated to operate at LOS D or better except for the following: Del Mar Heights Road/Old Carmel Valley Road (LOS E, AM peak hour); Del Mar Heights Road/Carmel Valley Road (LOS F, AM/PM peak hours); Carmel Valley Road/SR 56 westbound ramps (LOS F, AM peak hour); and Carmel Valley Road/SR 56 eastbound ramps (LOS E/F during AM/PM peak hours). As shown in Table 5, *Near Term + Project Intersection Operations*, and Table 6, *Near Term + Project Street Segment Operations*, and based on City of San Diego significance criteria, no significant direct impacts were calculated, as the increase in delay is less than the allowable thresholds (2.0 seconds for LOS E, 1.0 seconds for LOS F).

Table 5. Near Term + Project Intersection Operations

Intersection	Control Type	Peak Hour	Near Term		Near Term + Project		Delay Δ^c	Sig?
			Delay ^a	LOS ^b	Delay	LOS		
1. Del Mar Heights Rd/ Carmel Canyon Rd	Signal	AM	27.8	C	27.8	C	0.0	No
		PM	29.9	C	29.9	C	0.0	
2. Del Mar Heights Rd/ Seagrove St	Signal	AM	7.6	A	7.6	A	0.0	No
		PM	6.5	A	6.5	A	0.0	
3. Del Mar Heights Rd/Old Carmel Valley Rd	Signal	AM	78.8	E	79.2	E	0.4	No
		PM	49.5	D	50.2	D	0.7	
4. Del Mar Heights Rd/ Carmel Valley Rd	Signal	AM	140.8	F	141.2	F	0.4	No
		PM	129.8	F	130.2	F	0.4	
5. Carmel Valley Rd/SR 56 WB Ramps	Signal	AM	117.3	F	118.1	F	0.8	No
		PM	38.9	D	40.0	D	1.1	
6. Carmel Valley Rd/SR 56 EB Ramps	Signal	AM	57.4	E	58.0	E	0.6	No
		PM	132.7	F	133.1	F	0.4	

Footnotes:

- Average delay expressed in seconds per vehicle.
- Level of Service.
- Δ denotes the increase in delay due to Project.

General Notes

- Sig = Significant impact, yes or no.

Table 6. Near Term + Project Street Segment Operations

Intersection	Existing Capacity (LOS E) ^a	Near Term			Near Term + Project			Delay Δ ^c	Sig?
		ADT ^b	LOS ^b	V/C ^d	ADT	LOS	V/C		
Del Mar Heights Road									
1. Lansdale Dr to Carmel Canyon Rd	50,000	24,955	B	0.499	25,046	B	0.501	0.002	No
2. Carmel Canyon Rd to Seagrove St	50,000	28,155	C	0.563	28,254	C	0.565	0.002	No
3. Seagrove St to Old Carmel Valley Rd ^f	45,000	27,085	C	0.602	27,184	C	0.604	0.002	No
4. Old Carmel Valley Rd to Carmel Valley Rd	40,000	29,535	C	0.738	29,831	C	0.746	0.008	No
Old Carmel Valley Road									
5. Del Mar Heights Rd to Project Access	10,000	5,680	C	0.568	6,074	C	0.607	0.039	No
Carmel Valley Road									
6. Del Mar Heights Rd to SR 56	40,000	41,715	F	1.043	41,972	F	1.049	0.006	No

Footnotes:

- Capacities based on City of San Diego Roadway Classification & LOS table.
- Average Daily Traffic.
- Level of Service.
- Volume to Capacity Ratio.
- Δ denotes a Project-induced increase in the Volume to Capacity ratio.
- Del Mar Heights Road from Seagrove Street to Old Carmel Valley Road currently provides three lanes in the westbound direction and two lanes eastbound which translates to an increased capacity of 45,000 ADT.

General Notes

- Sig = Significant impact, yes or no.

Similarly, delays observed in the Horizon Year 2050 + Project were less than the allowable thresholds. All street segments were calculated to operate at LOS D or better with the exception of Carmel Valley Road (Del Mar Heights Road to SR 56), which operates at LOS F. Because the change in volume to capacity ratio (V/C) is less than 0.01, no significant direct impacts would occur.

Intersections were calculated to operate at LOS D or better except for the following: Del Mar Heights Road/Old Carmel Valley Road (LOS F, AM/PM peak hours); Del Mar Heights Road/Carmel Valley Road (LOS F, AM/PM peak hours); Carmel Valley Road/SR 56 westbound ramps (LOS F/E, AM/PM peak hours); and Carmel Valley Road/SR 56 eastbound ramps (LOS F AM/PM peak hours). As shown in Table 7, *Horizon Year 2050 + Project Intersection Operations*, and Table 8, *Horizon Year 2050 + Project Street Segment Operations*, and based on City of San Diego significance criteria, no significant direct impacts were calculated, as the increase in delay is less than the allowable thresholds (2.0 seconds for LOS E, 1.0 seconds for LOS F).

Therefore, the results of the capacity analyses presented in the TIA identified no significant transportation impacts would occur as a result of the project. Per City of San Diego significance thresholds and the analysis methodology presented in the TIA, the project would not result in significant direct or cumulative project impacts to study area intersections or roadway segments under existing, near-term, or horizon year with project conditions. No mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND. The project would not result in any new significant transportation and/or circulation impacts or a substantial increase in the severity of transportation and circulation impacts from those described in the EIR or MND.

Table 7. Horizon Year 2050 + Project Intersection Operations

Intersection	Control Type	Peak Hour	Year 2050 Without Project		Year 2050 + Project		Delay Δ^c	Sig?
			Delay ^a	LOS ^b	Delay	LOS		
a. Del Mar Heights Rd/ Carmel Canyon Rd	Signal	AM	46.1	D	46.2	D	0.1	No
		PM	42.0	D	42.1	D	0.1	
b. Del Mar Heights Rd/ Seagrove St	Signal	AM	15.5	B	15.5	B	0.0	No
		PM	13.2	B	13.2	B	0.0	
c. Del Mar Heights Rd/ Old Carmel Valley Rd	Signal	AM	101.7	F	102.3	F	0.6	No
		PM	109.2	F	109.9	F	0.7	
d. Del Mar Heights Rd/ Carmel Valley Rd	Signal	AM	321.5	F	322.2	F	0.7	No
		PM	233.1	F	233.3	F	0.2	
e. Carmel Valley Rd/ SR 56 WB Ramps	Signal	AM	218.8	F	219.6	F	0.8	No
		PM	78.0	E	79.1	E	1.1	
f. Carmel Valley Rd/ SR 56 EB Ramps	Signal	AM	157.0	F	157.6	F	0.6	No
		PM	220.7	F	221.4	F	0.7	

Footnotes:

- a. Average delay expressed in seconds per vehicle.
- b. Level of Service.
- c. Δ denotes the increase in delay due to Project.

General Notes

1. Sig = Significant impact, yes or no.

Table 8. Horizon Year 2050 + Project Street Segment Operations

Intersection	General Plan Capacity	Existing Capacity (LOS E) ^a	Horizon Year 2050 Without Project			Horizon Year 2050 + Project			Delay Δ^e	Sig?
			ADT ^b	LOS ^b	V/C ^d	ADT	LOS	V/C		
Del Mar Heights Road										
1. Lansdale Dr to Carmel Canyon Rd	50,000	50,000	27,500	B	0.550	27,591	B	0.552	0.002	No
2. Carmel Canyon Rd to Seagrove St	50,000	50,000	31,700	C	0.634	31,799	C	0.636	0.002	No
3. Seagrove St to Old Carmel Valley Rd ^f	50,000	45,000	30,300	C	0.673	30,399	C	0.676	0.003	No
4. Old Carmel Valley Rd to Carmel Valley Rd	50,000	40,000	33,600	D	0.840	33,896	D	0.847	0.007	No
Old Carmel Valley Road										
5. Del Mar Heights Rd to Project Access	10,000	10,000	7,500	C	0.750	7,894	D	0.789	0.039	No
Carmel Valley Road										
6. Del Mar Heights Rd to SR 56	40,000	40,000	42,500	F	1.063	42,757	F	1.069	0.006	No

Footnotes:

- Capacities based on City of San Diego Roadway Classification & LOS table.
- Average Daily Traffic.
- Level of Service.
- Volume to Capacity Ratio.
- Δ denotes a Project-induced increase in the Volume to Capacity ratio.
- Del Mar Heights Road from Seagrove Street to Old Carmel Valley Road currently provides three lanes in the westbound direction and two lanes eastbound which translates to an increased capacity of 45,000 ADT.

General Notes

- Sig = Significant impact, yes or no.

Biological Resources

Seabreeze Farms EIR

The EIR analyzed impacts to *Biological Resources* for the Seabreeze Farms project within Section IV-C. Native habitats at the project was found to be located on slopes that did not connect with a significant open space system and, hence, the value of the habitats is limited. Nonetheless, the EIR concluded that future development of the site, per the limits of grading associated with the Seabreeze Farms project would have the following significant impacts:

- Loss of 0.04 acre of coastal sage scrub.
- Loss of 0.08 acre of southern maritime chaparral.
- Loss of 0.35 acre of scrub oak chaparral.
- Loss of approximately 56 percent of the area occupied by Nuttall's scrub oak.

- Loss of approximately 67 percent of the total population of California adolphia.
- Indirect impacts to sensitive animal species.

The EIR included mitigation measures to reduce impacts to biological resources to below a level of significance. Mitigation Measure IV-C.1 would fully mitigate direct biological resource impacts by complying with mitigation ratios for the respective impacts (Table 9, *Mitigation Measure IV-C.1: Project Impacts to Sensitive Resources*). Mitigation Measure IV-C.2 would be satisfied by mitigating indirect impacts to sensitive species by avoiding indirect lighting impacts on conserved habitat through selective placement, shielding, and directing lighting away from conserved habitat, as well as vegetation screening and large spot-light type lighting being prohibited.

Table 9. Mitigation Measure IV-C.1: Project Impacts to Sensitive Resources, Replacement Ratios, and Recommended Mitigation

Resource	Direct Impact	Fuel Mod. Impact	Total Impact	Replacement Ratio	Mitigation
Coastal sage scrub	0.04 acre	1.20 acres	1.24 acres	1:1	1.24 acres
Southern maritime chaparral	0.08 acre	0.76 acre	0.84 acre	2:1	1.68 acres
Scrub oak chaparral	0.35 acre	2.32 acres	3.67 acres	2:1	5.34 acres
Nuttall's scrub oak	56% of population	--	56% of population	1:1	Present on mitigation parcel
				3:1	Replanting onsite or off-site
California adolphia	67% of population	--	67% of population	1:1	Present on mitigation parcel
				3:1	Replanting onsite or off-site

Impacts associated with implementing the City's fuel management program for the Seabreeze Farms project were quantified by overlaying the fuel management area for the Seabreeze Farms project on a map of biological resources that occurred on the site at the time the original biological resources study was conducted. All resources within the fuel management area were assumed to be 100 percent lost. Implementation of the fuel management program would result in the loss of 6.6 acres of native and non-native habitats, mostly sensitive habitat lands. The fuel management program was in compliance with the Landscape Technical Manual and was subject to review and approval by the Development Services Department.

Impacts to habitat types, along with a determination of their significance, are as follows:

- Loss of 1.20 acres (35%) of coastal sage scrub – significant.
- No loss of disturbed coastal sage scrub – no change.
- Loss of 0.84 acre (26%) of southern mixed chaparral – less than significant.
- Loss of 0.22 acre (15%) of disturbed southern mixed chaparral – less than significant.
- Loss of 0.76 acre (100%) of southern maritime chaparral – significant.
- Loss of 2.32 acres (48%) of scrub oak chaparral – significant.
- No loss of mule fat scrub – no change.
- No loss of non-native grassland – no change.
- No loss of agricultural land – no change.
- Loss of 1.55 acres (13%) of disturbed habitat – less than significant.
- No loss of developed land – no change.

Implementation of the fuel management program would have no impacts to rare plants beyond what would occur with the Seabreeze Farms project, with the exception of coast barrel cactus as described in further detail. Three of the four specimens of this species were located along the periphery of the brush management zones, and loss of

these individuals was considered to be a significant impact. Future brush management activities were expected to have significant impacts to coastal sage scrub (1.20 acres), southern maritime chaparral (0.76 acre), and scrub oak chaparral habitats (2.32 acres), in addition to the loss of Nuttall's scrub oak and California adolphia, as well as three individual coast barrel cactus. It was determined that Mitigation Measure IV-C.3 would fully mitigate this impact. This mitigation measure included placement of a conservation easement on the remaining open space lands, but the acquisition in fee title or a conservation easement in favor of the City an appropriate off-site mitigation parcel. Off-site acquisition was to be focused within the North City Future Urbanizing Area to the areas east of the project and meet the following criteria:

- The parcel must be at least 7.36 acres in size.
- The parcel must occur within an MSCP core area within the City of San Diego boundaries.
- The parcel should support southern maritime chaparral, scrub oak chaparral, coastal sage scrub, or other native habitats acceptable to the City.
- The parcel should support Nuttall's scrub oak and California adolphia.

The EIR determined that the encroachment into project-level open space by equestrian trails was a potentially adverse effect on remaining sensitive habitats and sensitive species. To address this impact, Mitigation Measure IV-C.4 was implemented and required the following: equestrian trails and pasture areas to be located in areas that avoid impacts which supported sensitive biological resources; equestrian use was to be continued on existing trails and within disturbed areas; provide fencing of trails and pastures and a provision of appropriate signage, such as those defining the area as "habitat restoration," in areas adjacent to sensitive biological resources, and the requirement for biologist consultation when designing any new trails. Furthermore, any new trails or pastures within the conservation easement area required new site plans to be submitted to the Development Services Department for review and approval prior to the recordation of the Final Map and/or prior to issuance of grading permits. As such, implementation of Mitigation Measure IV-C.4 reduced this impact to below a level of significance.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed *Biological Resources* within its Initial Study Checklist and concluded that implementation of the project would result in the direct loss of 51.69 acres (72 percent of the project site) of native, non-native, and disturbed/developed habitats within the project site from grading and/or Brush Management Zone 1 activities. Of that amount, there would be a direct loss of 3.82 acres of sensitive habitat that includes 0.55 acre of coastal sage scrub, 1.90 acres of southern mixed chaparral, 0.23 acre of southern maritime chaparral, and 1.14 acres of scrub oak chaparral. The 3.82-acre loss was considered to be a significant impact to biological resources according to the City's Multiple Species Conservation Program (MSCP).

Direct impacts to sensitive plant species would include the loss of approximately 25 percent of the area occupied by Nuttall's Scrub Oak and the loss of approximately 25 percent of the total population of 400+ individuals of California adolphia. These impacts were considered to be less than significant according to the MSCP/Biological Guidelines at that time. As the result of the 1999 Focused Narrow Endemic Plant Surveys for the Seabreeze Farms project, no adverse impacts would occur to any narrow endemic plant species with the project, and the potential for any narrow endemics to be present on-site is low to none.

In order to mitigate impacts to sensitive biological resources, the off-site acquisition of 2.87 acres of habitat was required, as well as the recordation of a conservation easement and/or dedication of fee title to the City of San Diego or other acceptable entity of 2.87 acres. The MND required that the mitigation parcel be located within the City' MHPA and have equal or greater habitat value than what is impacted. The parcel should support Southern Maritime Chaparral, Scrub Oak Chaparral, Coastal Sage Scrub, Southern Mixed Chaparral, and/or native habitats acceptable to the City of San Diego. This requirement was included as Mitigation Measure 4, which was to be completed prior to recordation of the first final map and/or issuance of the first grading permit.

Alternately, in lieu of the off-site acquisition and placement of a conservation easement and/or land dedication to mitigate biological impacts at that time, the applicant could make a contribution of \$126,000.00 for off-site mitigation to the City's Habitat Acquisition Fund (No. 10571). This option was included as Mitigation Measure 5. Implementation of Mitigation Measure 4 or 5 was determined mitigate project impacts to below a level of significance. Implementation of these mitigation measures was to be completed prior to recordation of the first final map and/or issuance of the first grading permit.

Required mitigation measures have been fully implemented with construction of the Seabreeze Farms project through payment to the City's Habitat Acquisition Fund for off-site mitigation (Mitigation Measure 5).

Proposed Project

A *Biological Technical Report* (BTR) was prepared for the Seabreeze Senior Living project by Alden Environmental, Inc. (November 26, 2018). As analyzed in the BTR and summarized below, the project would not result in impacts to sensitive vegetation communities, sensitive plant species, sensitive animal species, or jurisdictional/wetland resources. As such, it was determined through this analysis that no mitigation measures would be required respect to impacts to Biological Resources.

Five vegetation communities/land cover types occur on the project site (Figure 7, *Biological Resources Map*). Table 10, *Existing Vegetation Communities/Land Cover Types*, presents a list of these communities/cover types and their respective acreage totals. Vegetation communities that occur off-site, but are within the 100-foot biological buffer map are not analyzed, as they are not within the project footprint and have been included on the map for informational purposes only.

Table 10. Existing Vegetation Communities/Land Cover Types

Vegetation Community/Land Cover Type¹	Project Site Acre(s)	Off Site Acre(s)
Upland		
Scrub Oak Chaparral (Tier I)	0.02	--
Diegan Coastal Sage Scrub (Tier II)	0.44	--
Diegan Coastal Sage Scrub – Disturbed	0.02	0.04
Other Upland		
Disturbed Land (Tier IV)	0.11	--
Land Cover		
Urban/Developed	9.53	0.02
TOTAL	10.12	0.24

¹ Upland vegetation communities are divided into five tiers of sensitivity.

Sensitive vegetation communities are considered rare within the region or sensitive by CDFW (Holland 1986) or the City (2012). These communities in any form (for example, -Disturbed) are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site supports two sensitive vegetation communities: Scrub Oak Chaparral and Diegan Coastal Sage Scrub (including Disturbed).

Construction of the Seabreeze Senior Living project would directly impact 0.09 acre of Diegan Coastal Sage Scrub (including Disturbed) (Table 11, *Impacts to Vegetation Communities/Land Cover Types*). Typically, impacts to Diegan Coastal Sage Scrub (Tier II) are considered significant by the City. However, according to the City's Biology Guidelines (City 2012), total upland impacts (to Tiers I through IIIB) of less than 0.1 acre are not considered significant and do not require mitigation. The project would impact 0.09 acre of Diegan Coastal Sage Scrub (including Disturbed); therefore, this impact would not be considered significant and mitigation would not be required. There would be no direct impacts to the remaining upland vegetation communities from the proposed project (i.e., Tier I Scrub Oak Chaparral).

Table 11. Impacts to Vegetation Communities/Land Cover Types

Vegetation Community/ Land Cover Type	On-Site Impact ¹ Acre(s)	Off Site Impact ¹ Acre(s)	TOTAL
Upland			
Scrub Oak Chaparral (Tier I)	--	--	--
Diegan Coastal Sage Scrub (Tier II)	0.05	--	0.05
Diegan Coastal Sage Scrub -- Disturbed	--	0.04	0.04
Other Upland			
Disturbed Land (Tier IV)	--	--	--
Land Cover			
Urban/Developed	7.6	0.2	7.8
TOTAL	7.65	0.24	7.89

¹ BMZ 1 is located entirely within the graded footprint and, therefore, is not calculated separately.

Approximately 7.8 acres of urban/developed land would be directly impacted by project construction. Since this land cover is not a sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS, impacts to Urban/Developed would be less than significant. No mitigation would be required.

Sensitive Plant Species

Three sensitive plant species were observed (Figure 7). They include Nuttall's Scrub Oak (*Quercus Dumosa*), San Diego Barrel Cactus (*Ferocactus Viridescens*), and Spineshrub (*Adolphia Californica*). These species all occur outside of the project limits; although the Nuttall's Scrub Oak (20 individuals) and San Diego Barrel Cactus (two individuals) are located within project's BMZ II area (this is impact neutral).

Construction of the project would not directly impact sensitive plant species observed (Nuttall's Scrub Oak, San Diego Barrel Cactus, and Spineshrub). That is, construction would not cause the removal of these plants or adverse impacts to these species. Therefore, no mitigation would be required.

Construction of the project would not directly impact sensitive plant species with moderate potential to occur (Summer Holly and Wart-Stemmed Ceanothus) because these species occur in chaparral habitats, which would not be impacted. Impacts are also not anticipated to sensitive plant species with the low potential to occur. No mitigation would be required.

Sensitive Animal Species

One sensitive animal species has been observed outside of the project footprint, within the biological buffer mapping area: Coronado Skink (*Plestiodon Skiltonianus Interparietalis*; Figure 7). Construction of the project would not directly impact sensitive animal species observed (i.e., Coronado skink). While the project would directly impact 0.09 acre of potential habitat for the species (Diegan Coastal Sage Scrub [including Disturbed]), the area of impact is below a level of significance, and the impact would not significantly affect the species. No mitigation would be required.

Similarly, construction of the project is not expected to directly impact sensitive animal species with moderate to high potential to occur (Coastal California Gnatcatcher and Southern California Rufous-Crowned Sparrow). While the project would directly impact 0.09 acre of potential habitat for these species (Diegan Coastal Sage Scrub [including Disturbed]), the area of impact is below a level of significance and the loss of habitat for these species, should they occur, would be less than significant. No mitigation would be required.

Nesting Birds

Direct impacts to nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503 and 3503.5 could result if clearing of vegetation or construction occurs during the nesting

season (February 1 to September 15). Clearing of vegetation or construction activities could cause destruction of active nests or mortality of adults, young, or eggs. The Seabreeze Senior Living Project must comply with the MBTA and California Fish and Game Code Sections 3503 and 3503.5 and avoid these impacts. Therefore, with compliance with these regulatory standards, no specific mitigation measures are required.

The project would not result in significant impacts to sensitive vegetation communities, sensitive plant species, sensitive animal species, or jurisdictional/wetland resources. While there are no significant impacts and, therefore, no mitigation is required, a Permit Condition for "Biological Resource Protection During Construction," as described below, would be required to ensure the project's scope would be limited to the project impact footprint and that there would be no indirect impacts associated with the introduction and/or spread of non-native, invasive plant species to ESL during construction activities.

Potential indirect impacts consist of the potential secondary effects of a project, such as drainage/water quality issues, fugitive dust, lighting, noise, public access, invasive plant species, disruption of avian nesting, and nuisance animals. The magnitude of an indirect impact can be the same as a direct impact, but the effect typically takes a longer time to become apparent. For example, fugitive dust from equipment used during grading could settle on nearby vegetation and interfere with photosynthetic processes. Immediate impacts to plant health may not be apparent, but over time, the plants may be adversely affected.

Drainage/Water Quality

The release and spread of toxins, chemicals, petroleum products, and other elements can degrade or harm the natural environment or ecosystems processes. All potential drainage and toxics impacts would be minimized during construction through the project's required use of the City's Construction Site Best Management Practices (SDMC §43.0301) and compliance with City of San Diego Storm Water Standards (City 2018). Once completed, the project would include above-ground detention basins with biofiltration media, which serve the dual purposes of hydromodification management and pollutant treatment, respectively. Therefore, with regulatory compliance and project design features, potential impacts resulting from drainage or impaired water quality from the project would be less than significant. As such, no mitigation measures would be required.

Fugitive Dust

Fugitive dust produced by construction can disperse onto adjacent native vegetation and significantly affect sensitive species, sensitive natural communities, and wetlands. A continual cover of dust can reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals dependent on these plants (e.g., seed-eating rodents). Fugitive dust also may make plants unsuitable as habitat for wildlife. Construction of the project would include the use of dust control measures required in SDMC Section 142.0101 et seq. Therefore, construction would result in less-than-significant impacts from fugitive dust with the implementation of these protocols. No mitigation would be required.

Lighting

Nighttime illumination exposes wildlife to an unnatural light regime that may adversely affect foraging patterns, increase predation risk, cause biological clock disruptions, and result in a loss of species diversity. Potential nighttime illumination impacts would be minimized to less-than-significant levels by the project's adherence to the City's Outdoor Lighting Regulations (SDMC §142.0740). Therefore, with regulatory compliance, no mitigation would be required.

Noise – Construction

Construction-related noise from such sources as clearing, grading, and construction vehicular traffic would be a temporary impact to wildlife from implementation of the proposed project. These noise-related impacts would be considered significant if species sensitive to noise are present. The coastal California gnatcatcher, which is sensitive to noise, has moderate to high potential to occur. However, noise-related impacts to the gnatcatcher are only an issue if the site is located within the MHPA. The project site is not within (or adjacent to) the MHPA. The City has

take authorization for the Coastal California Gnatcatcher, so noise impacts to this species outside the MHPA are allowed, and no mitigation would be required.

Noise – Operation

The project would not create noise-related impacts that would affect the coastal California gnatcatcher that has moderate potential to occur. Noise-related impacts to the gnatcatcher are only an issue if the site is located within the MHPA. The project site is not within (or adjacent to) the MHPA. The City has “take” authorization for the Coastal California Gnatcatcher, so noise impacts to this species outside the MHPA are allowed. No mitigation would be required.

Public Access

A public trail system is planned as part of the approved Precise Plan for Carmel Del Mar Neighborhoods 4, 5, and 6, within the open space of the eastern most portion of Neighborhood 4. According to the Precise Plan, the trail system is based on the existing unimproved trails that flow throughout the disturbed areas of the pasture and open space areas of the Neighborhood.

Access to the planned trails would occur as part of the Seabreeze Senior Living project, as required by the City’s Parks and Recreation Department. The project would provide for a connection to the off-site regional trail and improvements to the public trail system for the section of the trail that crosses the project site. This section would be improved with a natural soil material in accordance with Appendix K of the Consultants Guide to Park Design and Development. (See Figure 2, *Pedestrian Circulation Exhibit*.) The project would not create new trails off-site. Therefore, potential indirect impacts to ESL from the project associated with public access are not anticipated, and no mitigation would be required.

Disruption of Avian Nesting

Indirect impacts to nesting birds protected by the MBTA and California Fish and Game Code Sections 3503 and 3503.5 could result if clearing of vegetation or construction activity near active avian nests occurs during the nesting season (February 1 to September 15) and causes abandonment of the nests resulting in mortality of eggs or young. Indirect impacts to protected nesting birds would be considered significant. The Seabreeze Senior Living project must comply with the MBTA and California Fish and Game Code Sections 3503 and 3503.5. Therefore, with regulatory compliance, no mitigation is required.

Invasive Plant Species

Invasive, non-native plants can displace native plants; reduce species diversity; increase flammability and fire frequency; change ground and surface water levels; and adversely affect native wildlife dependent on the native flora. Invasive, non-native plants can colonize areas disturbed by construction and potentially spread into adjacent natural communities. Invasive, non-native plants can also spread from landscaping into adjacent natural communities.

The potential introduction and/or spread of invasive, non-native plant species to natural communities during construction would be considered a significant impact. The introduction and/or spread of these species can occur, for example, if plant material is introduced or spread from the tires or undercarriages of construction equipment or if grading activities exceed authorized limits and weed-infested soil enters ESL. The project would include conditions to protect biological resource during construction (see above). SDMC Landscape Standards would be followed by the proposed project so that no potentially invasive plant species are planted in landscaping adjacent to ESL resulting in a less-than-significant impact from landscaping. No mitigation would be required.

Nuisance Animals

Residential projects have the potential for domestic animals to impact native wildlife. While domesticated pets may cause predation (cause the majority of this mortality), findings suggest that feral cats are likely the single greatest source of mortality for birds and mammals in the United States. If the senior residential care facility allows pet ownership, it is expected that the animals will be required to remain indoors, or when outdoors, under human control (i.e., leashed). A condition for this requirement will be provided inclusive of project operations. Therefore,

with compliance, potential indirect impacts to native wildlife from nuisance domestic animals would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND in terms of impacts to Biological Resources. The project would not result in any new significant impacts or a substantial increase in the severity of impacts from those described in the EIR or MND.

Hydrology/Water Quality

Seabreeze Farms EIR

The Seabreeze Farms EIR analyzed potential impacts to *Hydrology/Water Quality* in Section IV-D. The EIR determined that project implementation would not require significant modifications to the natural drainage system comprised of Bell Valley and Carmel Valley Creek. This is due to the fact that the natural drainage system would be preserved in open space. However, drainage from the project site was required to be properly directed through storm drain facilities to ensure that runoff volumes did not exceed the existing runoff volumes. This was ensured through Mitigation Measure IV-D.1. This measure included a series of tentative map conditions, requirements to design necessary storm drain facilities, and to provide on-site detention facilities to the satisfaction of the City Engineer.

Additionally, the EIR determined that future development of the site with residential and equestrian uses represented a potentially significant cumulative impact on water quality of downstream water bodies due to manure from horses, generation of urban pollutants, short-term and long-term erosion and sedimentation, as well as construction-related contaminant discharge. These impacts were able to be mitigated to the extent feasible by Mitigation Measures IV-D.2 and IV-D.3, but not to below a level of significance, resulting in unmitigated cumulative impacts to hydrology and water quality. Mitigation Measure IV-D.2 requires a Storm Water Pollution Prevention Plan (SWPPP) and a Monitoring Program Plan were to be developed during discretionary permit review for future tentative maps or development permits, as well as compliance with Section C, *Special Provisions for Construction Activity*, of Storm Water Resource Control Board (SWRCB) Order No. 92-08-DWQ (p.3), as applicable. Mitigation Measure IV-D.3 includes conditions for future development permits and/or tentative maps relative to short-term and long-term erosion control.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed *Hydrology/Water Quality* within its Initial Study Checklist and concluded that the project would not expose people or property to water-related hazards such as flooding. The site was determined at that time to be not located within a 100-year floodplain per FIRM Map 06073C1329F (June 19, 1997). The MND determined that the Seabreeze Farms project may result in a change in currents, or the course or direction of water movements, in either marine or fresh waters, similar to the Seabreeze Farms EIR. Site storm drains were required to connect into the municipal storm drainage system. The project did not require modifications to the natural drainage system (comprising Bell Valley and Carmel Valley Creek, which was preserved in open space). However, project approval required that drainage plans be prepared to the satisfaction of the City Engineer prior to the issuance of grading permits, as required in EIR Mitigation Measure IV-D.1 (included in the MND as Mitigation Measures 6, 7, and 8).

Relative to the potential discharge of significant amounts of pesticides, herbicides, fertilizers, gas, oil, or other noxious chemicals into surface or ground waters, EIR Mitigation Measures IV-D.2 and IV-D.3 were incorporated into the MND as Mitigation Measures 9 and 10 to ensure that the project addressed storm water runoff associated with construction as well as short- and long-term erosion control. All impacts would be mitigated to below a level of significance.

Proposed Project

A *Drainage Study* was prepared by Project Design Consultants (July 23, 2018) for the Seabreeze Senior Living project. As noted in the drainage study, under *Existing Conditions*, existing storm drains are located on the project site. Storm drains generally run through the central portion of the development area, continuing off-site to an

existing off-site storm in an adjacent developed lot and eventually connecting to an existing storm drain in Sandown Way, as well connecting to an existing storm drain that continues off-site to the adjacent open space lot. These storm drains were constructed per the mass grading and storm drain plans for Seabreeze Farms (DWG No. 30128-D) project. As observed during a site visit at the equestrian facility, there are several area drains and brooks boxes located around the site. It is likely additional storm drain lines were installed during the development of the equestrian center.

The project site is not located within a FEMA Special Flood Hazard Area per FIRM panel 06073C1329G, (effective date May 2012). The project is not subject to the Clean Water Act (CWA) Sections 401 and 404 since there would be no proposed fill or dredging activities that would discharge into an aquatic environment.

Proposed on-site runoff would be treated and then commingled with off-site run-on (i.e., runoff sourced from outside the project site), before being directed to the project outfall. Because the proposed on-site runoff is treated before being commingled with the off-site run-on, the off-site run-on does not require treatment. The peak discharge flow for the proposed condition would be 22.0 cubic feet per second (cfs), while for the backbone (primary system) study the peak discharge was 23.0 cfs. Since the discharge pipe was designed and appropriately sized, according to the backbone drainage study, there will be no required modifications to the downstream existing storm drain system from a design and efficiency perspective. Provided this background, the pipe would be able to convey the post-development 100-year flows into the proposed drainage system. No impacts would result.

The project would not significantly alter the drainage pattern of the project site or area. Under proposed conditions, surface drainage would be conveyed along private driveways, courtyards, patios, and landscaping. The proposed building facilities and casitas would have roof drainage conveyed into landscaping or into an area drain system via roof downspouts. On-site runoff would be conveyed through a proposed private storm drain system that would connect to the existing storm drain system. Runoff into the existing and proposed storm drain system would be collected and captured by inlets via gutter flow, or through sheet flow into a basin, or through area drain conveyance. The discharge location with the proposed site design would utilize the same as the outfall location as it presently exists. All on-site (with commingled off-site runoff from Seabreeze Farms) runoff would convey through the existing 24-inch reinforced concrete pipe (RCP) outlet which is located at the western mid-section of the site. The project would include structural Best Management Practices (BMPs) for storm water pollution control.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND with respect to Hydrology or Water Quality impacts. The project would not result in any new significant Hydrology or Water Quality impacts or a substantial increase in the severity of impacts from those described in the EIR or MND.

Landform Alteration/Visual Quality

Seabreeze Farms EIR

The Seabreeze Farms EIR included analysis of impacts that the project would have on *Landform Alteration and Visual Quality* in Section IV-E. The EIR found that implementation of the Seabreeze Farms project would represent a change from the existing visual character of the uses on the site. It was determined that the visual change would not result in direct long-term impacts to views from public vantage points when considered in association with the visual character of the existing and planned surrounding development. However, the EIR determined that the development of urban uses, which would result in the project's contribution to the cumulative urbanization of views from Carmel Valley Road associated with the buildout of Subarea III, was considered a significant impact. Mitigation measures that would reduce the project's contribution to cumulatively significant impacts associated with the urbanization of views from Carmel Valley Road were not available; only the adoption of the *No Project Alternative* would avoid the contribution of the Seabreeze Farms project to the cumulative visual impacts caused by the overall development in this portion of the North City Future Urbanizing Area.

As noted in Section IV-K, *Noise*, of the Seabreeze Farms EIR and discussed below, development of the Seabreeze Farms project required the construction of noise walls at residences adjacent to Carmel Valley Road, as well as residences along SR 56. These walls were found to have a potentially significant impact on visual quality, depending on the height of the walls. Mitigation included in Section IV-K limited noise walls to six feet in height or less. Where a higher noise barrier was required, either a combination berm with a maximum six-foot-high wall or increased setback would be required in this design situation. With implementation of these mitigation measures, visual impacts were determined to remain below a level of significance.

Relative to changes in topography or ground surface relief features, the limits of grading proposed as part of the Seabreeze Farms Community Plan Amendment was restricted predominately to the more level terrain along the eastern border of the site, except for fill grading at the eastern terminus of the finger canyon in the central area of the Seabreeze Farms project site. Grading for the entire Seabreeze Farms project was estimated to be 300,000 to 600,000 cubic yards. Significant landforms, including the floor of Bell Valley and the slopes of the finger canyons that extend from the valley floor, would not be significantly altered with implementation of the project. However, the amount of grading occurring within the eastern terminus of the finger canyon was considered a significant impact. Mitigation Measure IV-E.1 was required to mitigate this impact to below a level of significance. Mitigation Measure IV-E.1 required any future Tentative Map for the Seabreeze Farms site to incorporate grading concepts and guidelines outlined on pages 66 to 70 of the Carmel Valley Neighborhood 4, 5, and 6 Precise Plan with respect to variable slope gradients, contour grading, slope revegetation, use of berms, and utilization of landscaping to soften slope interfaces.

Relative to modification of unique geological or physical features, such as hillsides with a slope gradient in excess of 25 percent, the EIR determined that the total encroachment into steep slopes greater than 25 percent associated with the Seabreeze Farms project would be limited to interior slopes that are not greater than 50 feet in height. The impacted slopes greater than 25 percent are those that are not as prominent since they are located towards the interior of the project, and are less than 50 feet in height. Views of these slopes are restricted mainly to views from development located at a distance to the west and interrupted by natural terrain. In addition, brush management activities impacting slopes greater than 25 percent consist of selective thinning of vegetation and do not involve grading or extensive clearing. Landform impacts resulting from creation of those slopes and impacts to other slopes as a result of brush management activities were found not to be significant.

Seabreeze Farms MND

The Seabreeze Farms project would involve grading of slopes of 25 percent or greater. These slopes are located at the eastern terminus of the finger canyons extending up from Bell Valley. Based on the Seabreeze Farms project grading plan, the MND determined that the configuration of manufactured slopes to the west of residential Lots 68 to 76 (located along what is currently the southern portion of Rider Place and the western portion of Coach Lane) and southwest of the equestrian area did not conform to the Landform and Grading Concepts and Guidelines (Section III(F)(1)) of the Carmel Del Mar Neighborhoods 4, 5, and 6 Precise Plan, as amended. This was considered to be a significant impact to landform alterations/visual quality.

To mitigate this impact, Mitigation Measure 11 required use of contour grading, variable slope ratios, and slope revegetation on the project's grading plan to create more natural appearing manufactured slopes. This was delineated on the final "Exhibit A". Lengthy, continuous "engineered" slopes with hard edges (especially adjacent to Lots 68 to 76 and southwest of the equestrian village) and transition/rolled areas at the tip or toe of the slope were to be avoided. This mitigation measure was especially applicable along slopes where natural landform contour grading would be used to create a more natural appearing transition to undisturbed slopes. Implementation of Mitigation Measure 11 was determined to mitigate Landform Alteration/Visual Quality impacts to below a level of significance.

Proposed Project

The Seabreeze Senior Living project includes a central two-story building, and five detached single-story duplex casitas. In order to minimize visual impacts, revisions have occurred through the design and community-review process for the project. This was done to minimize visual impacts to existing neighbors, both adjacent to the

project site and to the west across the canyon as it relates to the project. Revisions have included: changing the building location on the site plan to increase buffer between existing Seabreeze Farms residents along Sandown Way and Rider Place and the private drive for Seabreeze Senior Living; a reduction in building height of the main building (from three to two stories); reconfiguration of roof structures to minimize their height; a wholesale revision to project architecture from modern to Spanish Revival to reflect the dominant architectural style in the surrounding areas; and individualized landscape screening methods (such as the installation of large screening shrubs, vines, and ornamental planting) for each abutting neighbor to ensure the desired level of screening is provided. As a result of these efforts, the project reflects the existing character of the neighborhood and would not result in a significant impact relative to visual quality.

Because the project would redevelop the disturbed site of the equestrian facility, no significant landform alteration would occur as the disturbed area is presently relatively level. The site requires finish grading in preparation of development, resulting in minimal cut and fill grading (6,342 cubic yards of cut and 11,683 cubic yards of fill), which reflects the minimal alteration to the landform that occurs as a result of the project. The maximum depth of cut would be eight feet and the maximum depth of fill would be seven feet. Fill slopes would be at a maximum height of 20 feet with a 2:1 ratio; cut slopes would be at a maximum height of one foot with a 2:1 slope ratio. Grading would be contoured at the edges of existing slopes to avoid a manufactured appearance. With implementation of these practices, impacts to landform alteration would be less than significant; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND as it relates to Landform Alteration/Visual Quality issues. As such, the project would not result in any new significant landform alteration of visual quality impacts from that described in the EIR or MND.

Cultural Resources

Seabreeze Farms EIR

The Seabreeze Farms EIR evaluated impacts to *Cultural Resources* in Section IV-F. The EIR determined that implementation of the Seabreeze Farms project would directly impact Cultural Resource Site CA-SDI-6802. As part of the Seabreeze Farms project, Carmel Valley Road was to be extended to meet Carmel Knolls Drive in Neighborhood 4. Site CA-SDI-6802 was determined to be located in the right-of-way for the planned extension of Carmel Valley Road. Impacts to Site CA-SDI-6802 was considered a significant impact of the Seabreeze Farms project. Mitigation Measure IV-F.1 included the requirement for testing of the site and with a determination for significance, with additional guidance should the site be determined to be significant. Implementation of this mitigation measure reduced impacts to below a level of significant.

As required under Mitigation Measure IV-F.1, a final cultural resources report, *Archaeological Testing at Seabreeze Farms*, was submitted to EAS in December of 1998 which provided the results of a testing program for site CA-SDI-6802. This report documents the archaeological significance evaluation of the previously recorded site CA-SDI-6802. The investigation in the report determined that CA-SDI-6802 failed to meet the minimum requirements to be considered an important cultural resource under the criteria set forth in CEQA and the City of San Diego Cultural Resources Guidelines. Consequently, the Seabreeze Farms project would not result in adverse impacts to any significant archaeological resources, and no further measures were recommended for the mitigation of impacts to CA-SDI-6802.

Seabreeze Farms MND

Cultural resources were considered during review of the subsequent Seabreeze Farms project, and a cultural resources report was completed for the project. The investigation in the final cultural resources report determined that CA-SDI-6802, located on the project site, failed to meet the minimum requirements to be considered an important cultural resource under the criteria set forth in CEQA and the City of San Diego Cultural Resources Guidelines. Therefore, no impacts would result with the subsequent Seabreeze Farms project.

Proposed Project

The project site has been graded in accordance with the approved Seabreeze Farms Vesting Tentative Map. As referenced within the EIR and MND, significant archaeological resources that had been identified within the project area (CA-SDI-6802) have been fully mitigated. The project site is not designated or listed, either individually or as part of a district, on a local, State, or national historical sites register. The project site has been previously graded in accordance with the approved Vesting Tentative Map for Seabreeze Farms. Based on this background, impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant Cultural Resources impacts or a substantial increase on the severity of impacts to Cultural Resources from that described in the EIR or MND.

Air Quality

Seabreeze Farms EIR

The Seabreeze Farms EIR evaluated impacts to *Air Quality* in Section IV-G. The EIR found that implementation of the proposed equestrian facility would generate significant levels of dust without any dust control measures and would cause detectible odors associated with manure if not properly handled. Approval of the Seabreeze Farms project required implementation of Mitigation Measure IV-G.1 to fully mitigate dust impacts and Mitigation Measure IV-G.2 to fully mitigate odor impacts. Both mitigation measures have been implemented as part of the Seabreeze Farms project.

Additionally, the Seabreeze Farms EIR determined that implementation of the project would generate dust during construction that would significantly affect adjacent off-site residents and future on-site residents. Implementation of Mitigation Measure IV-G.3 was required to reduce this construction-related impact to below a level of significance.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed *Air Quality* within its Initial Study Checklist. Large generators, typically those producing more than 50 horsepower, could potentially function as a stationary source of criteria pollutants due to exhaust emissions. The MND identified that no alteration of air movement would result in the project area, as the project would not include tall structures or large generators. Additionally, the MND concluded that the project would not result in a substantial alteration in moisture or temperature or any other change in climate, either locally or regionally.

The MND concluded that substantial amounts of dust could be generated from project construction. Construction dust control mitigation was provided in Mitigation Measure IV-G.3 of the EIR, incorporated into the MND as Mitigation Measure 12.

Relative to the equestrian use, as similar to the EIR, the MND concluded that the facility could result in the generation of dust from equestrian activities and odor from manure if not properly managed. Dust control measures from the EIR (Mitigation Measure IV-G.1) were incorporated into the MND via Mitigation Measure 13; odor control measures from the EIR (Mitigation Measure IV-G.2) were incorporated into the MND via Mitigation Measure 14. All impacts were found to be mitigated to below a level of significance with incorporation of these measures.

Proposed Project

An *Air Quality Study* was prepared by Birdseye Planning Group (April 2019). The study analyzed the potential for temporary air quality impacts associated with construction and long-term air quality impacts associated with operation of the proposed project. Air quality modeling was performed in accordance with the methodologies outlined in the SDAPCD 2016 RAQS to identify both construction and operational emissions associated with the proposed project. All emissions were calculated using the California Emissions Estimator Model (CalEEMod)

software version 2016.3.2 which incorporates current air emission data, planning methods and protocol approved by California Air Resources Board (CARB).

Based on this modeling, construction of the proposed project would not exceed the San Diego Air Pollution Control District (SDAPCD) regional construction emission thresholds for daily emissions. Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions. The majority of operational emissions would be associated with vehicle trips to and from the project site. The net change in emissions between what currently operates on the site versus the project was determined to not exceed the SDAPCD thresholds for the criteria pollutants evaluated. Provided this background, no significant impacts would result. Nonetheless, the Seabreeze Farms EIR and MND identified the potential for significant impacts associated with generation of dust during construction. Therefore, implementation of Mitigation Measure IV-G.3 of the Seabreeze Farms EIR (restated as Mitigation Measure 12 in the Seabreeze Farms MND) would be required to reduce this construction-related impact to below a level of significance. (See Section VI of this Addendum.)

The project would involve the use of diesel-powered construction equipment. Diesel exhaust may be noticeable temporarily at adjacent properties; however, construction activities would be temporary in nature and would not continue after project buildout. The project would provide senior care services and does not include industrial or agricultural uses that are typically associated with objectionable odors. However, the project would include filtered heating, ventilation, and air conditioning (HVAC) systems throughout the building(s) and ventilation filters/hoods for the kitchen areas to avoid or minimize odors associated with food preparation. Therefore, impacts associated with objectionable odors would be less than significant.

Although carbon monoxide (CO) is not a regional air quality concern in San Diego Air Basin (SDAB), elevated CO levels can occur at or near intersections that experience severe traffic congestion. Screening for possible elevated CO levels is recommended for severely congested intersections experiencing levels of service E or F with project traffic where a significant project traffic impact may occur. The TIA prepared for the project determined that no significant direct or cumulative project impacts to study area intersections or roadway segments would occur under existing, near-term cumulative, or horizon year conditions. Provided this background, receptors would not be exposed to substantial pollutant concentrations.

The RAQS relies on information from CARB and SANDAG, including projected growth within the County of San Diego. The RAQS also uses mobile, area, and all other source emissions to project future emissions and determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the General Plan has been determined to be consistent with the SIP, AQMP and RAQS.

The proposed project involves the construction of 128 senior housing units on the site. The majority of the project site is zoned AR-1-1. The access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone. The project proposes development of a Residential Care Facility on the portion of the site zoned AR-1-1. The proposed project is allowed in the AR-1-1 zone with a Conditional Use Permit. The project also requires an amendment to the Carmel Valley Community Plan and North City West Carmel Del Mar Neighborhoods 4, 5 and 6 Precise Plan to change the existing land use designation from Equestrian Facility to Residential Care Facility. The project is intended to provide housing for senior residents and is expected to serve existing residents within the San Diego region. However, whether this could create an adverse air quality impact is determined based on vehicle miles traveled (VMT) between the existing use and what is projected with the proposed project, and whether this change would increase regional VMT beyond what was used in preparation of the AQMP and RAQS.

The SIP/AQMP/RAQS are based on a buildout scenario under the General Plan. Because Community Plans are a part of the General Plan, SIP/AQMP/RAQS consistency was compared to existing VMT, full buildout under the current zoning and Community Plan land use designation and the proposed project. Under existing conditions, annual VMT is approximately 658,227. Under the full build out scenario, the equestrian facility and associated

administrative uses would be expanded to accommodate larger scale equestrian events based on limitations of the AR-1-1 zone. The total square footage would be approximately 14,500 square feet greater than what is currently developed on the project site, or 53,704 square feet of equestrian uses, resulting in 1,009,006 annual VMT. VMT associated with the proposed project is estimated to be 891,483 annual miles. This represents approximately 11 percent less than what could occur with buildout under the current zoning. Daily emissions associated with the proposed project would be slightly higher than projected under the build out scenario primarily because of higher energy demand associated with lighting, food preparation, water consumption and related activities. However, a portion of these emissions would be offset with project design features including energy efficient lighting, mechanical equipment, low flow plumbing fixtures and water efficient landscaping. Provided these features are incorporated, project emissions would be below the daily thresholds referenced within the Air Quality Study.

Operation of the proposed project would house residents within the region and is not expected to increase the local population or otherwise induce growth. The Air Quality Study concluded that the project would not exceed daily thresholds established by the SDAPCD and City of San Diego during construction or operation; and thus, would not cause an adverse air quality impact. Furthermore, emissions associated with the existing use do not exceed the SDAPCD and City of San Diego thresholds. While project-related VMT and related emissions would be higher than the existing use or those that could occur with buildout under the current land use designation, emissions would not exceed the thresholds required to cause a significant adverse impact to air quality under either scenario. Therefore, the project would not increase regional VMT to the extent that it could compromise attainment of regional air quality goals and/or be inconsistent with the SIP, AQMP, and RAQS. Impacts related to this threshold would be less than significant.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND. The project would implement Measure IV-G.3 of the Seabreeze Farms EIR (restated as Mitigation Measure 12 in the Seabreeze Farms MND) to reduce potential air quality impacts associated with dust generation during construction to below a level of significance. This is further described in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum. The project would not result in any new significant air quality impacts or a substantial increase in the severity of air quality impacts from those described in the EIR or MND.

Geology/Soils

Seabreeze Farms EIR

Impacts relative to *Geology/Soils* were analyzed in Section IV-H of the Seabreeze Farms EIR. The EIR concluded that there were no soil or geologic conditions observed or known to exist on the project site that would preclude development of the Seabreeze Farms project. However, potentially significant geologic and soil conditions (including landslides, expansive soils, alluvial soils, poorly conditioned soils, liquefaction potential, and ground shaking due to seismic events) exist within the Mission Valley Formation in the northeast portion of the site, and various unstable geologic formations, and would require mitigation. Implementation of Mitigation Measure IV-H.1 was required to reduce geology impacts associated with unstable geologic formations, soils, and geologic hazards to below a level of significance.

The Seabreeze Farms EIR also determined that erosion potential associated with future development on the Seabreeze Farms project site would potentially be significant. Mitigation Measure IV-H.2, along with mitigation identified in *Hydrology/Water Quality* (discussed above), would ensure the impacts associated with on-site erosion potential would remain below a level of significance the requirement for a project-specific landscaping plan which was to be prepared prior to the issuance of a grading permit for any proposed development to be located on the Seabreeze Farms project site. In addition to other requirements, the required landscape plan shall provide short-term and long-term erosion control measures.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed *Geology/Soils* within its Initial Study Checklist. This analysis was based on a soil and geologic reconnaissance report prepared for the Seabreeze Farms MND by Geocon, Inc. (Geocon)

(February 21, 1997). The report indicated that the site was underlain by three shallow surficial soil units that consisted of "low" to "medium" expansive soils. The applicant was required to implement measures to mitigate potential impacts that may occur from expansive and compressible soil materials at the site. These measures were required to be included in a detailed soils and geologic investigation report. This was required to be prepared to the satisfaction of the City Engineer, as required in Mitigation Measure 15, prior to the recordation of the first final map and/or issuance of the first grading permit. Implementation of this measure were determined to reduce project impacts to below a level of significance.

Proposed Project

A *Geotechnical Investigation* was prepared for the project by Geocon (February 23, 2018). The project site was previously graded in 2000 to 2001 during the mass grading phase for the Seabreeze Farms residential subdivision located east of the site. Grading was performed under the observation and testing of Geocon. A summary of observations and compaction testing is provided in Geocon's "as-graded" report. Grading specific to the site consisted of placing approximately three to 30 feet of fill for the development of the existing equestrian center. Fill slopes were graded along the western side of the project site to heights ranging from approximately five feet to 50 feet. A 16-foot high cut slope was graded at the east side of the site. In-place density tests performed during previous grading activities indicated that the soils were compacted to at least 90 percent relative compaction at the locations tested. The Geotechnical Investigation concluded that, from a geotechnical engineering standpoint, the site is suitable for development of the proposed project.

Soil and Geologic Conditions

The property is underlain by compacted fill overlying the Torrey Sandstone Formation (Tt). Compacted fill placed during previous grading activities is present throughout the site. Fill soils were encountered in all of the borings to the maximum depths explored at approximately 20 feet below the surface of the existing grade. The fill predominantly consists of silty to clayey sand, sandy clay, and sandy silt with some cobbles. Laboratory tests indicate the fills possess a medium expansion potential (EI of 90 or less) with a low potential for compression when loaded. The fill is considered suitable for additional fill and/or planned improvements. The Eocene-aged Torrey Sandstone (Tt) underlies the compacted fill. The Torrey Sandstone (Tt) consists primarily of dense, moist, light yellow to light gray and white, silty, fine- to medium-grained sandstone. The Torrey Sandstone (Tt) generally possesses moderate shear strength, low expansion potential, and relatively low compressibility characteristics. As such, it should provide adequate support for engineered fill and provides suitable foundation support for structures. Therefore, impacts would be less than significant; no mitigation is required.

Groundwater

Groundwater was not encountered during the site investigation. Groundwater is expected to be greater than 70 feet below the existing ground surface; however, it is not uncommon for saturated or seepage conditions to develop where none previously existed. Groundwater elevation is dependent on seasonal precipitation, irrigation, land use, etc. Proper surface drainage would be important to future performance of the project. Because no groundwater was encountered, impacts related to near-surface groundwater elevation (such as liquefaction) would be less than significant; no mitigation is required.

Geologic Hazards

Geologic Hazard Category

The City of San Diego Seismic Safety Study (2008), Sheet 38 identifies the site as Geologic Hazard Category 53 within the proposed building pad areas. Geologic Hazard Category 23 is identified within the slope area to the west. Category 53 is defined Level or sloping terrain, unfavorable geologic structure, Low to moderate risk. Category 23 is defined as Friars: neutral or favorable geologic structure. Provided this background, this represents a favorable geologic structure with respect to geologic hazards and implementation of the project.

Ground Rupture

No evidence of faulting was observed during the investigation. The USGS (2016) shows that there are no mapped Quaternary faults crossing or trending toward the property. The site is not located within a currently established Alquist-Priolo Earthquake Fault Zone. No active faults are known to exist at the site. The nearest active fault, the Newport Inglewood/Rose Canyon Fault Zone, lies approximately five miles west of the site. Provided this background, impacts would be less than significant; no mitigation is required.

Seismicity

A deterministic seismic hazard analysis was performed using Risk Engineering (2015). Seven known active faults are located within a search radius of 50 miles from the property. The 2008 USGS fault database was used which provides several models and combinations of fault data to evaluate fault information. The nearest known active fault is the Newport-Inglewood/Rose Canyon Fault system, located approximately than five miles west of the site and is the dominant source of potential ground motion. Earthquakes that might occur on the Newport-Inglewood/Rose Canyon Fault Zone or other faults within the Southern California and Northern Baja California area are potential generators of significant ground motion at the site. The estimated deterministic maximum earthquake magnitude and peak ground acceleration for the Newport-Inglewood Fault are 7.5 and 0.38g, respectively. The estimated deterministic maximum earthquake magnitude and peak ground acceleration for Rose Canyon Fault are 6.9 and 0.32, respectively.

The project site could be subjected to moderate to severe ground shaking in the event of an earthquake along any of the faults in the Southern California/Northern Baja California region. Because this is true of most of Southern California in general, the site is not considered to possess a greater risk than that of the surrounding developments.

A probabilistic seismic hazard analysis for the site was performed using Risk Engineering (2015). The computer program operates under the assumption that the occurrence rate of earthquakes on each mapped Quaternary fault is proportional to the faults slip rate. The program accounts for earthquake magnitude as a function of fault rupture length, and site acceleration estimates are made using the earthquake magnitude and distance from the site to the rupture zone. The program also accounts for uncertainty in each of following: (1) earthquake magnitude, (2) rupture length for a given magnitude, (3) location of the rupture zone, (4) maximum possible magnitude of a given earthquake, and (5) acceleration at the site from a given earthquake along each fault. By calculating the expected accelerations from considered earthquake sources, the program calculates the total average annual expected number of occurrences of site acceleration greater than a specified value. While peak acceleration is useful for comparison of potential effects of fault activity in a region, other considerations are important in seismic design, including the frequency and duration of motion and the soil conditions underlying the site. As recommended in this model, the seismic design of the structures shall be evaluated in accordance with the 2016 California Building Code (CBC) guidelines or guidelines currently adopted by the City of San Diego.

With implementation of this method as a project condition, impacts would be less than significant; no mitigation is required.

Landslides

No landslides were encountered at the project site or in an area that could impact the property. Standard development BMPs related to slope stability would be implemented to minimize landslide hazards. As such, the risk of landslides is low. Impacts would be less than significant; no mitigation is required.

Liquefaction and Seismically Induced Settlement

Due to the absence of a near surface groundwater elevation and the dense to very dense nature of the on-site soils, the risk associated with ground failure or seismically induced settlement and liquefaction hazard was determined to be low. Impacts would be less than significant; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND from geologic hazard perspective.

The project would not result in any new significant Geologic impacts or a substantial increase in the severity of impacts from those described in the EIR or MND.

Agriculture/Natural Resources

Seabreeze Farms EIR

The EIR evaluated *Agriculture and Natural Resources* impacts in Section IV-I. The 72-acre Seabreeze Farms project site included approximately 16 acres that were identified as Farmland of Statewide Importance (comprising of approximately 22 percent of the project site). Nearly 90 percent of the on-site areas of Farmland of Statewide Importance were permanently committed to developed areas as part of the Seabreeze Farms project. The project site was not being actively used to produce row or truck crops or flowers, and on-site soils types and characteristics, availability of irrigation, and topography were limiting factors relative to agricultural productivity. As a result, the direct impact of converting the site to non-agricultural uses was determined not to be significant. The EIR concluded, however, that conversion of Farmland of Statewide Importance represented a significant contribution to cumulative losses of agricultural lands and stated that it was beyond the scope of the Seabreeze Farms project to mitigate for the project's contribution to cumulative losses of agricultural land. Only implementation of the No Project Alternative would avoid this cumulative impact. No mitigation was required relative to a direct impact of on-site loss of agricultural land.

There are no existing mining operations that would be replaced during implementation of the Seabreeze Farms project. However, implementation of Seabreeze Farms precluded the mining of potential MRZ-3 aggregate on-site. The loss of potential aggregate resources in the MRZ-3 was determined to be less than significant, due to the project's limited size and the potential for mineral resources to occur in the area is low. The project's contribution to the cumulative loss of commercially-viable aggregate deposits in San Diego County that would supply future needs was determined to be minor and considered less than significant, given the site's relatively small acreage and low potential for aggregate resources.

Seabreeze Farms MND

Referencing the determination in the Seabreeze Farms EIR with regards to agricultural land, the MND identified that the conversion of agricultural land to non-agricultural use or impairment of the agricultural productivity of agricultural land was a potential impact. However, the MND did not find conversion of agricultural land to be a significant impact warranting mitigation. Relative aggregate resources, the Seabreeze Farms MND did not address the project's impact on aggregate resources. Thus, no impacts were identified.

Proposed Project

The majority of the project site is zoned AR-1-1. Although the access drive occurs within the adjacent CVPD-SF2 zone, and a very small sliver in the southern portion of the project site lies within the CVPD-OS zone, the area where development is proposed lies within the AR-1-1 zone. The project site has been completely graded and is developed as an equestrian facility. As with previous projects, no agricultural land or farming activities occur on the project site, and the project does not propose agriculture activities. No new impacts would result relative to agriculture or natural resources.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or the Seabreeze Farms MND. The project would not result in any new significant impacts associated with agriculture or natural resources or a substantial increase in the severity of impacts from those described in the EIR or the MND.

Paleontology

Seabreeze Farms EIR

Paleontological resources were analyzed in Section IV-J of the EIR. Grading operations associated with the Seabreeze Farms project would cut into nearly all of the geologic units found on-site, which include Friars Formation, Mission Valley Formation, Stadium Conglomerate, and Torrey Sandstone. Alluvium and slopewash

deposits occur in open spaces areas that would not be affected by the Seabreeze Farms project. Additionally, the EIR determined that designation of the upper slopes of Bell Valley in the northern portion of the site as open space avoid more than 60 percent of the high fossil potential Friar's Formation. The potential for the affected formations to contain important paleontological resources ranges from moderate to high. The Seabreeze Farms EIR concluded that potentially occurring paleontological resources would be adversely affected by the Seabreeze Farms project, unless recovered during grading. Mitigation Measure IV-J.1, which required monitoring of grading activities, was required to sufficiently ensure the recovery of any resources and mitigate the direct potential impacts to paleontological resources to below a level of significance.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed Paleontological Resources within its Initial Study Checklist and, like the Seabreeze Farms EIR, concluded that project grading may impact unknown paleontological resources in the underlying Mission Valley and Friars Formations, Torrey Sandstone, and Stadium Conglomerate. Mitigation Measure IV-J.1 was updated to match standard City paleontological mitigation requiring monitoring of grading activities and included within the MND as Mitigation Measure 16. All impacts would be mitigated to below a level of significance.

Proposed Project

The project site is underlain by the Torrey Sandstone Formation. Within Carmel Valley, Torrey Sandstone Formation has a high sensitivity for fossils. As discussed in the EIR and MND, potential impacts to this formation are considered significant and can be mitigated to a level that is considered less than significant by adhering to the recommended mitigation measures for Paleontological Resources. Paleontological monitoring as identified in the Seabreeze Farms EIR and updated by the MND would be required to mitigate the impact to below a level of significance.

Per the City's Significance Determination Thresholds for Paleontological Resources, "Monitoring may be required for shallow grading (i.e., <10ft) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface." In reviewing the project's *Geotechnical Investigation* prepared for the project by Geocon (February 23, 2018), the project area, which was previously graded, contains the highly sensitive Torrey Foundation at depths three feet below the existing grade. Provided this background, paleontological monitoring as identified in the Seabreeze Farms EIR and updated by the MND would be appropriate to implement with the project in order to mitigate impacts to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would implement mitigation measure IV.J.1 as described in the Seabreeze Farms EIR and repeated in the MND to reduce potential impacts to paleontological resources to below a level of significance. This is further described in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum. The project would not result in any new significant paleontological resources impacts nor is there a substantial increase in the severity of paleontological resource impacts from that described in the EIR or MND.

Noise

Seabreeze Farms EIR

The EIR evaluated potential impacts from *Noise* in Section IV-K of the Seabreeze EIR. The EIR found that temporary construction noise would result in an impact that would be significant but mitigated to below a level of significance. Mitigation Measure IV-K.1 included conditions for construction and general maintenance activities, construction equipment mufflers, and construction staging areas.

On-site traffic-related noise would result in an impact that would be significant but mitigated to below a level of significance at residential areas. Mitigation Measure IV-K.1 include measures relative to setbacks, building orientation, and noise barriers. Additionally, Mitigation Measure IV-K.1 required the preparation of future noise

studies as a condition of a Planned Residential Development permit or Tentative Map to ensure appropriate mitigation measures for the residences and usable open space areas have been incorporated into project design and would meet the City's noise criteria.

Off-site traffic-related noise impacts were found to be less than significant. Noise from Naval Air Station (now Marine Corp. Air Station) Miramar was determined to be less than significant, as would cumulative noise impacts, because the increase of noise levels to any off-site street attributable to the project was 1 dB or less. Therefore, the EIR concluded that both construction and traffic-related noise would be mitigated to below a level of significance.

Seabreeze Farms MND

The Seabreeze Farms MND analysis of the project's noise impacts was based on the acoustical report prepared by Dudek and Associates, Inc., *Seabreeze Farms-Acoustical Assessment Report* (January 26, 1999). The acoustical report indicated that the future noise levels at several residential lots adjacent to Carmel Valley Road and SR 56, including lots 13, 14, 16, 17, 27, 28, 30, 31, and 56, would experience noise levels ranging from approximately 66 to 72 dB CNEL. This would exceed the City's exterior noise criteria of 65 dB CNEL for a residential use. The City's interior noise level standard for residential uses is 45 dB CNEL. The homes exposed to an exterior CNEL greater than 60 dB could also result in interior CNEL greater than 45 dB CNEL standard. Typically, with the windows open, and using standard California construction materials and methods, the building shells provide approximately 15 dB of noise reduction. Even with this structural attenuation, lots adjacent to Carmel Valley Road were determined to exceed the City's interior noise level standard of 45 dB CNEL. Thus, the MND determined that the Seabreeze Farms project has the potential to result in significant exterior and interior noise impacts.

In order to mitigate noise impacts to below a level of significance, sound attenuation barriers were recommended to be located in specific areas to address this issue. Submittal of a final acoustical report was required to identify all measures necessary to achieve noise attenuation to City standards. With implementation of Mitigation Measures 17 and 18, all noise impacts would be mitigated to below a level of significance. Mitigation has been fully satisfied for all affected lots with the completion of the Seabreeze Farms project.

Proposed Project

A *Noise Analysis Report* was prepared for the project by dBf Associates, Inc. (September 27, 2018). The analysis evaluated noise associated with the implementation of the project. The analysis assessed potential short-term construction and long-term operational noise impacts to nearby noise-sensitive land uses and biological resources.

The project site is situated generally west of Sandown Way and north of Rider Place. Cathedral Catholic High School is located at the northerly boundary of the project site, with open space located immediately to the west. Single-family and multi-family residential development is located to the east and south of the project site. The project site is over one-quarter mile from the nearest Mobility Element roadway (Del Mar Heights Road). The project site is approximately six miles north of Marine Corps Air Station Miramar, which is the closest airport.

According to the Noise Element of the General Plan, noise levels up to 60 dBA CNEL are considered Compatible with outdoor use areas; noise levels up to 70 dBA CNEL are considered Conditionally Compatible. Due to the project site's distance from the nearest Mobility Element roadway and the nearest airport, the temporary nature of construction, and the below-threshold operational noise impacts, the project site is not and would not be exposed to noise levels over 60 dBA CNEL. Provided this background, transportation noise impacts affecting the project site would be less than significant; and therefore, no mitigation is required.

Construction of the project would generate a short-term temporary increase in noise in the project area. The increase in noise level would be primarily experienced closest to the noise source. The magnitude of the impact would depend on the type of construction activity, noise level generated by various pieces of construction equipment, duration of the construction phase, acoustical shielding, and distance between the noise source and receiver. The primary noise from project construction would be from site preparation (grading), which would require the use of heavy equipment such as bulldozers, loaders, and scrapers. This project would implement

conventional construction techniques and equipment. Standard equipment such as scrapers, graders, backhoes, loaders, tractors, cranes, and miscellaneous trucks would be used for construction of most project facilities. No blasting would be necessary for redevelopment of the project site. Construction activity and delivery of construction materials and equipment would be limited to daytime hours (between 7:00 a.m. and 7:00 p.m.), Monday through Saturday.

The closest occupied residential properties are located adjacent to the project site on the east, and beyond the valley to the west. Construction of the project would produce noise levels ranging from approximately 68 to 72 dBA Leq at the property lines of the residences to the east, and from approximately 55 to 57 dBA Leq at the property lines of the residences to the west. Construction would occur within the hours proscribed by the City of San Diego Municipal Code. Construction noise levels would be below the 75 dBA Leq (12 hour) sound level allowed by the City of San Diego Municipal Code. Given this background, project construction noise impacts to residences would be less than significant; no mitigation is required.

The project would produce operational noise levels ranging from approximately 31 to 42 dBA Leq at the property lines of the residences to the east, below 30 dBA Leq at the property lines of the residences to the west, and below 35 dBA Leq at the property line of the school. Operational noise levels at the single-family residences to the east would remain below the nighttime (most restrictive level) sound level limit of 42.5 dBA Leq allowed by the City of San Diego Municipal Code. Operational noise levels at the single-family residences to the west would be below the nighttime (most restrictive level) sound level limit of 40 dBA Leq allowed by the City of San Diego Municipal Code. Operational noise levels at the school to the north would be below the nighttime (most restrictive) sound level limit of 47.5 dBA Leq allowed by the City of San Diego Municipal Code. Refuse vehicles or parking lot sweepers would operate on the project site between 7:00 a.m. and 7:00 p.m. The impact of project-generated operational noise at off-site land uses would be less than significant; no mitigation is required.

Per recently adopted State law AB 3098 which went into effect on January 1, 2019, senior residential care facilities must implement additional measures for emergency preparedness. To comply with this law, the project would include an emergency back-up generator. The generator would be generally located at the north side of the main building, proximate to the loading dock. Noise levels produced by the generator testing would be below the daytime sound level limits of 57.5 dBA Leq at the north (school), 52.5 dBA Leq at the east (adjacent residential), and 50 dBA Leq at the west (non-adjacent residential) property lines. Project impacts resulting from emergency generator noise would be less than significant.

The proposed project would generate traffic along existing roads in the project area. An analysis was conducted of the project's effect on traffic noise conditions at off-site land uses. Existing-without-Project traffic noise levels were compared to Existing-with-Project traffic noise levels. The highest relative project-generated traffic increase would occur on Old Carmel Valley Road, south of Del Mar Heights Road. Adjacent land uses include single-family residences, the St. Augustine of Canterbury Church, and the Cathedral Catholic High School. Along this roadway segment, the project would add an ADT volume of 394 vehicles to an existing ADT volume of 5,580 vehicles. This traffic increase corresponds to a noise level increase of approximately 0.3 dBA CNEL. The City of San Diego considers traffic noise level increases less than 3 dBA to remain below a level of significance. Furthermore, sound level variations of less than 3 dBA have been found not to be detectable by the human ear. As demonstrated in the preceding discussion, project-generated traffic noise impacts at off-site land uses would be less than significant; no mitigation is required.

Vibration associated with operation of the project would be generated by vehicular traffic and mechanical equipment operation. It has been demonstrated with other scenarios that vehicles traveling on a smooth pavement surface are rarely, if ever, the source of perceptible ground vibration. All vehicles on the project site are anticipated to have rubber tires and suspension systems that isolate vibration from the ground and would generally travel at a maximum speed of approximately 10 miles per hour. All vehicular traffic would operate at 25 feet or greater from vibration-sensitive structures, which are defined as structures where the presence of unwanted vibration could adversely affect their use. As modeled, vehicular traffic at the project site is expected to generate vibration levels less than 0.01 in/sec PPV, the level for frequent intermittent sources considered "barely perceptible" by Caltrans (2013), at all on-site and off-site structures.

As to be specified, all mechanical equipment would be located at least 25 feet or greater from vibration-sensitive structures. Groundborne vibration levels resulting from mechanical equipment are dependent on the design of the equipment. Any project ground-mounted mechanical equipment would be installed using vibration-dampening resilient isolators which are designed to ensure that vibration levels would be lower than 0.3 in/sec PPV (the Caltrans (2013) threshold for continuous sources at older residential buildings) at all on-site and off-site structures. As demonstrated in the preceding discussion, operational vibration impacts as a result of the project would be less than significant; no mitigation is required.

The highest vibration levels generated by construction of the project would occur during grading activities. Project construction would not require pile driving activities. The construction equipment component anticipated to produce the highest potential vibration levels would be a vibratory roller. The vibratory roller could be operated as close as 40 feet from a residence. At 40 feet, using Caltrans (2013) propagation prediction methodology, the vibratory roller would generate approximately 0.125 in/sec PPV. A vibration level of 0.125 in/sec PPV could be "strongly perceptible" to humans within a residence but would not cause damage to "older residential structures" (Caltrans 2013). Temporary vibration impacts associated with construction would be less than significant; no mitigation is required.

Project construction noise could be as high as 73 dBA Leq in the open space areas that contains Coastal Sage Scrub, which is along the western side of the project site. This vegetation type may contain the Coastal California Gnatcatcher. It has been modeled that the project would produce operational noise levels below 50 dBA Leq within these Coastal Sage Scrub areas. However, these areas are not within the MHPA, and noise impacts to the gnatcatcher outside the MHPA are allowed. Noise impacts to biological resources would be less than significant; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. A project-specific acoustical analysis has been conducted for the project that demonstrates there would be no significant noise impacts. Therefore, the project would not result in any new significant noise impacts or a substantial increase in the severity of noise impacts from those described in the EIR or MND.

Public Facilities and Services

Seabreeze Farms EIR

The EIR evaluated impacts to *Public Facilities and Services* in Section IV-L. Public services include schools, parks and recreation, libraries, law enforcement, and fire protection.

PUBLIC FACILITIES

Water Service

The Seabreeze Farms EIR determined that project impacts to the City's existing water supply and infrastructure system would be potentially significant, but mitigated through payment of water capacity fees prior to approval of future development. Additionally, Mitigation Measure IL-V.3, required the preparation of a general landscaping plan which was to demonstrate reduced water consumption, and Mitigation Measure IL-V.4, which required the review of water (and sewer) distribution plans, would ensure mitigation of project impacts to below a level of significance.

Sewer Service

The Seabreeze Farms EIR determined that the project's impact on sewage treatment facilities would be cumulatively significant. This determination was based the background if the Point Loma Treatment Plant was not expanded and/or additional reclamation plants were not constructed prior to buildout of the subarea. During this time, the Point Loma plant was operating near its design capacity. The Seabreeze Farms project, in addition to other future development within the service area, would significantly impact the plant.

Direct impacts on sewage service was determined not be significant given the small portion of the project's contribution to regional sewage generation. The EIR concluded that cumulatively significant impacts to local sewer capacities would be mitigated through payment for additional sewer capacity. Additionally, the EIR provided Mitigation Measure IL-V.4, which required review of sewer (and water) distribution plans to ensure consistency, and Mitigation Measure IL-V.6, which required compliance with construction timing and funding under the Facilities Benefits Assessment for the Carmel Mountain Road Water Pipeline and the Carmel Valley Trunk Sewer line, shall be implemented to mitigate impacts to below a level of significance.

Solid Waste

The Seabreeze Farms EIR determined that the project would have a cumulatively significant impact on solid waste disposal in the region. Landfill space was constrained at the time and if new landfill locations were not approved, solid waste disposal would become difficult to provide. The EIR described that the Seabreeze Farms project, in combination with other future projects in the region, would be responsible for this impact. The EIR determined that the project would not have a direct significant impact. This was due to its small percentage of the overall waste stream and the expected implementation of an Integrated Management Plan within San Diego County. This plan was to implement a County-wide source reduction and recycling plan to reduce solid waste volumes in landfills. The EIR concluded that, with the implementation of Mitigation Measure IV-L.5, the preparation and approval of Waste Management Plans was required prior to approval of Final maps. These Waste Management Plans are intended to analyze a project's potential impacts on solid waste services and identify sufficient measures such that significant impacts are avoided. As such, impacts to solid waste were determined to be reduced to below a level of significance.

Gas, Electric, and Telephone Services

The Seabreeze Farms EIR determined that the project would not result in significant impacts to gas and electric service facilities. Additionally, no significant impacts to telephone service facilities would occur as a result of the Seabreeze Farms project.

PUBLIC SERVICES

Schools

The Seabreeze Farms project was estimated to generate 123 elementary school students. The EIR determined that this increase in student population could lead to overcrowded conditions at Del Mar Heights and Del Mar Hills Schools with a requirement for the addition of up to five portable classrooms. The project was also determined to generate 29 middle school students at Earl Warren Junior High School, which would require two additional classrooms, and 75 students at Torrey Pines High School, which would require three additional classrooms. Impacts associated with the increase in the students at public schools were determined to be significant. To address these impacts, Mitigation Measure IV-L.1, was required which required certification from Del Mar Union Elementary School District and San Dieguito High School District that any fee imposed by the District pursuant to Government Code Sections 53080 and 65995.3 had been paid prior to obtaining building permits. This was required to ensure that all applicable school fees were paid. With payment, it was determined that school population impacts would be reduced to below a level of significance.

Parks and Recreation

The Seabreeze Farms EIR found that there would be no significant impacts to existing neighborhood, community, or resource-based parks in the vicinity of the project. Although development and improvements to the community parks located in Carmel Valley would occur with population growth in the community, development of the Seabreeze Farms project would not result in interim significant impacts on the community park.

The Seabreeze Farms project was incorporated into Neighborhood 4, where a 15-acre neighborhood park and school combination would also be located. The Neighborhood 4 park is was scaled appropriately to accommodate the incremental population growth of the Seabreeze Farms project. The requirement to provide the equivalent of 1.8 acres of neighborhood parks for the Seabreeze Farms project was a requirement of the that project and has been satisfied through a fair-share contribution to the Carmel Valley PFFP. This was required through Mitigation

Measure IV-L.2 in the Seabreeze Farms EIR. With payment of the PFFP fee, the EIR determined that impacts to parks and recreation from the Seabreeze Farms project would be less than significant.

Library

The Seabreeze Farms EIR determined that development of the Seabreeze Farms project would result in less than significant impacts on library facilities in Carmel Valley. A new branch library, which would provide service for project residents, is required by the Framework Plan within Subarea III, when the North City Future Urbanizing Area population reaches 18,000 to 20,000. Location and timing of required library facility in the North City Future Urbanizing Area is dependent upon preparation and approval of a Subarea III Plan as well as population growth within the area. Mitigation Measure IV-L.2, which calls for a Public Facilities Financing Plan and Facilities Benefit Assessment establish fair share contributions for property within Carmel Valley Community Planning Area, was required of the Seabreeze Farms project to ensure impacts on library service would be less than significant.

Law Enforcement

Relative to law enforcement, the Seabreeze Farms EIR determined that the project would require the City to augment police staffing levels by one officer. Based on the "then-current" staffing level of eight percent of budgeted strength (which meets the acceptable range of calls for service/officer ratios and planned 1995-96 staffing/vehicle increases), the Seabreeze Farms project was determined to cause a less than significant impact. Additionally, the Framework Plan and Carmel Valley PFFP require construction of police facilities within the North City Future Urbanizing Area that would address cumulative impacts of Subarea III needs on police service. Implementation of the Carmel Valley PFFP would ensure that funds are available for law enforcement. The EIR required Mitigation Measure IV-L.2 to ensure fair share contribution for the Seabreeze Farms project.

Fire Protection

Relative to fire protection, the Seabreeze Farms EIR determined that the project would increase emergency service calls for local fire stations. The then-current response time of 4.9 minutes to the project site complied with the City of San Diego Fire Department response target of six minutes. The response time would still be below six minutes with the implementation of the Seabreeze Farms project. Therefore, the project would have a less than significant impact on fire protection services.

Seabreeze Farms MND

The Seabreeze Farms MND analyzed Public Facilities and Services within its Initial Study Checklist. Relative to fire and police protection, parks and recreation, and the maintenance of public facilities including road and other governmental services, the MND concluded that, similar to the EIR, the applicant would pay a fair share contribution for recreational facilities as determined by the Carmel Valley Public Facilities Financing Plan and Facilities Benefits Assessment. This mitigation measure was required in the EIR as Mitigation Measure IV-L.2 and was incorporated into the MND as Mitigation Measure 20.

Relative to schools, the MND concluded that the applicant would provide the City with certification from the Del Mar Union Elementary School District and San Dieguito High School District that any fees imposed by the Districts have been paid prior to issuance of building permits. This mitigation measure was required in the EIR as Mitigation Measure IV-L.1 and was incorporated into the MND as Mitigation Measure 19.

Public facilities were analyzed under a separate issue area in the MND: Utilities. The MND concluded that no impact would result relative to storm drainage, power, natural gas, and communications systems. Relative to water and sewer services, the MND concluded that development of the project would comply with the construction timing and funding requirements to be established in the approved Facilities Benefits Assessment for the Carmel Mountain Road Water Pipeline and the Carmel Valley Road Trunk Sewer. The applicant would also pay its fair share of other on-site and off-site water facility improvements necessary to serve the development, as identified in the City's Water Master Plan. EIR Mitigation Measures IV-L.3, IV-L.4, IV-L.5, and IV-L.6 were incorporated into the MND as Mitigation Measures 21, 22.a, 22.b, and 22.c, respectively.

Relative to solid waste, the MND concluded that existing solid waste disposal facilities were adequate within the project area. A manure management plan for the equestrian facility would be prepared and submitted to the City for approval prior to the issuance of building permits. The EIR requirement for the preparation of a Waste Management Plan (Mitigation Measure IV-L.5) was incorporated into the MND as Mitigation Measure 22.b. All impacts would be mitigated to below a level of significance.

Proposed Project

PUBLIC FACILITIES

Water Service

There are existing public water facilities within and directly adjacent to the project site. The project would be supplied potable water from existing piping in Old Carmel Valley Road and at the intersection of Rider Place and Coach Lane. Fire service and domestic service laterals would be installed with these locations, respectively. In order to achieve adequate fire flow and pressure under a pipe break scenario, the project was required to complete an off-site water improvement connecting two existing pipelines.

The project site is served by existing water service from the City, and adequate services are available to serve the project. The project is not anticipated to have a detrimental impact on existing water supply. The project would not result in significant impacts to water. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to Water Services or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

Sewer

A *Public Sewer Study* was performed for the project by Dexter Wilson Engineering, Inc. (September 28, 2018). The project would connect to the public sewer system located at the northwest extension of Coach Lane. The off-site sewer system has sufficient capacity to accommodate peak sewage flows from the project. Onsite sewer collection for the project would be private.

The sewer study concluded that implementation of the project would not interrupt existing sewer service to the site or other surrounding uses. The increased flow from the project would not have an effect on the capacity of the existing sewer main. The project would not result in significant impacts to sewer systems. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to Sewer Service or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

Solid Waste

A Waste Management Plan (WMP) was prepared by KLR PLANNING (March 2018) to provide an analysis of the solid waste impacts anticipated for the project. The project would be required to adhere to City ordinances as outlined in the San Diego Municipal Code, including Chapter 6, Article 6, Division 6 (Construction and Demolition Debris Diversion Deposit Program), Chapter 6, Article 6, Division 7 (Recycling Ordinance), and Chapter 14, Article 2, Division 8 (Refuse and Recyclable Materials Storage Regulations) for diversion of both construction waste during the demolition phase and solid waste during the long-term operational phase. The WMP for the project is designed to implement and adhere to all City ordinances and regulations with regards to waste management. The measures in the WMP would ensure that impacts are mitigated to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to solid waste services or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. Compliance with requirements would be satisfied through a condition of project approval.

Gas and Electric and Communications Services

Both the EIR and MND concluded that the project would not result in any significant impacts to gas, electric, or communications services. Similarly, the Seabreeze Farms project would not result in significant impacts to gas and electric service facilities, as well as communications services, as these services are already provided in the surrounding area. No new services would be required. No mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to Gas and Electrical Service or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

PUBLIC SERVICES

Schools

The project would not generate any school-aged children, as it is a senior living facility. No impacts would result; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. No impacts would result.

Parks and Recreation

The project would result in an additional 159 residents at the facility (based on 139 beds in the main building and 20 beds in the casitas), which would increase the demand for community parks. However, it is assumed that most recreation needs of residents would be satisfied within on-site amenities, which could include a fitness room and pool, outdoor courtyards, scenic overlooks, and internal trails, or within the communities where local family members may live. Additionally, the project includes improvements to the public trail system, a section of which crosses the project site. This section would be improved as a natural soil material in accordance with Appendix K of the Consultants Guide to Park Design and Development. (See Figure 2, *Pedestrian Circulation Exhibit*.)

Relative to Park and Recreation facilities, the EIR and MND noted that payment of would pay a fair share contribution (Mitigation Measure IV-L.2 - Seabreeze Farms EIR, Mitigation Measure 20 - Seabreeze Farms MND) for recreational facilities as determined by the Carmel Valley Public Facilities Financing Plan and Facilities Benefits Assessment mitigate project impacts to below a level of significance. The Seabreeze Senior Living project will be required to pay a Development Impact Fee (DIF) at the time of building permit issuance. A portion of the fee is based upon public facilities required to support the community's population, including the population-based park usable acreage and any other recreation facilities needed within Carmel Valley. The project would result in a less than significant impact to recreational facilities; no mitigation is required. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to libraries or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND.

Libraries

The project would result in an additional 159 residents at the facility (based on 139 beds in the main building and 20 beds in the casitas) people at the project site, which could increase the demand for library services within the service area. While project occupants may seek books from local libraries, books are expected to be obtained from related project amenities, which could include such project features as a reading room and living room areas. Additionally, the project would not result in a need for new or expanded facilities beyond those already being planned and would pay development impact fees that would be used to fund future facilities, including planned library expansions.

Relative to library facilities, the EIR and MND noted that payment of a fair share contribution (Mitigation Measure IV-L.2 - Seabreeze Farms EIR, Mitigation Measure 20 - Seabreeze Farms MND) for recreational facilities as determined by the Carmel Valley Public Facilities Financing Plan and Facilities Benefits Assessment would mitigate project impacts to below a level of significance. As with previous projects, the Seabreeze Senior Living project would pay its fair share used to fund future facilities, including planned library expansions, resulting in a less than significant impact to library facilities; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to libraries or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

Police and Fire Protection

The project could include up to 189 people at the site comprised of residents (up to 159) and employees (up to 30), which would incrementally increase police protection demand at the project site. Ongoing funding for police services is provided by the City's General Fund. Police protection is ordinarily extended to newly developed areas and funded as a function of the increased tax base. Additionally, impact fees would be required, which would help maintain police services. No new facilities or improvements to existing facilities would be required.

The project would result in an additional 189 people (including residents and employees) at the project site, which would incrementally increase the demand for fire protection services within the service area. The project would be constructed per applicable California Building and Fire codes and NFPA codes, and would be required to pay Development Impact Fees, which would be used to fund future facilities, including planned fire stations. The SDFD has facilities and staffing in the project area to adequately serve the project. Based on the Standard of Response Cover Review report prepared by Citygate Associates (February 22, 2017), the Carmel Valley community is not identified as a community where there are coverage gaps needing one or more fire stations. Although the project would result in increases in fire calls for service, no new facilities or improvements to existing facilities would be required as a result of the project. Therefore, project impacts to community fire protection services would be less than significant.

Relative to police and fire protection, the EIR and MND noted that payment of required fees would mitigate project impacts to below a level of significance. As with previous projects, the Seabreeze Senior Living project would pay its required Impact Fee Study (IFS) fees, resulting in a less than significant impact to fire protection; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would not result in any new significant impacts to police and fire protection or a substantial increase in the severity of impacts to utilities from that described in the EIR or MND. The proposed project itself would not require expanded or new facilities to be constructed, and therefore, no impacts would result from project implementation.

Health and Safety

Seabreeze Farms EIR

The Seabreeze Farms EIR evaluated public health and safety impacts in Section IV-M. Relative to exposure of people to potential health hazards, implementation of air quality measures contained in Mitigation Measure IV-G.2, which required the submittal of a manure management and facility maintenance plan prior to recordation of any future discretionary tentative map, was required to reduce fly and odor conditions at the equestrian facility to a less than significant level. Additionally, Mitigation Measure IV-M.1, which required review of future tentative maps by the Development Services Department to ensure that vector and nuisance control measures were incorporated into project planning in accordance with the San Diego County Department of Health, was required to mitigate mosquito-vector safety impacts to below a level of significance.

Relative to the potential to expose people to safety hazards, the EIR determined that the equestrian crossing on Carmel Valley Road presented a safety hazard between high-speed auto traffic and the unpredictable nature of horses encountering moving cars in close quarters, with associated horns other noises. The EIR concluded that this potentially significant safety impact would be mitigated to below a level of significance with implementation of Mitigation Measure IV-M.2, which required an applicant prepare a Public Safety Plan prior to approval of future planned developments and tentative maps within the Seabreeze Farms project site.

Seabreeze Farms MND

The Seabreeze Farms MND concluded that no impact would result relative to a future risk of an explosion or the release of hazardous substances, as no hazardous materials had been associated with the site per the County of San Diego Hazardous Materials Management Division's *Environmental Assessment Listing* (June 17, 1998). The MND indicated that three detention basins would be constructed in the finger canyons where there is a potential for malaria-carrying mosquitos to breed in standing water. Additionally, like the analysis in the EIR, the MND determined that the equestrian trail crossing over Carmel Valley Road presented a safety hazard. EIR vector Mitigation Measure IV-M.1 and equestrian safety Mitigation Measure IV-M.2 from the previous EIR were incorporated into the MND as Mitigation Measures 23 and 24, which were required to be implemented prior to recordation of the first final map and/or issuance of the first grading permit for the Seabreeze Farms project. All impacts were determined to be mitigated to below a level of significance, with incorporation of these measures.

Proposed Project

Review of the Geotracker database indicates that a potential clean-up site could be within 1,000 feet south of the project site. This 10-acre site is undeveloped and proposed for a future school site being developed with imported fill materials but is in the process of being graded. Prior to the 1970s, the site consisted of native land. Beginning in the 1970s, it was used for agricultural purposes. The Department of Toxic Substances Control (DTSC) reviewed the Final Preliminary Environmental Assessment (PEA) Report prepared for the site, which included a health risk screening evaluation for the potential school site.

During the PEA, soil and soil gas sampling was conducted to assess potential impacts from historical use and presence of total organic compounds (TOCs), Title 22 metals, total petroleum hydrocarbons (TPHs), organochlorine pesticides (OCPs), and methane, all which could pose a threat to human health and the environment. The workplan also proposed a Soil Management Plan for the two borrow source areas to be sampled for the same constituents. The PEA Report concluded that no further action is required for the site. Based on review of the PEA, neither a release of hazardous material nor presence of a naturally occurring hazardous material, which would pose a threat to public health or the environment under unrestricted land use, was indicated at the site. DTSC concurred with the conclusion that no further environmental investigation of this site was required.

Provided this background, no impacts would result relative to a future risk of an explosion or the release of hazardous substances, as no hazardous materials had been associated with the site per the County of San Diego Hazardous Materials Management Division's *Environmental Assessment Listing* (June 17, 1998), as noted in the Seabreeze Farms MND.

The Seabreeze Farms EIR and MND indicated that detention basins constructed in the finger canyons as part of the Seabreeze Farms project had a potential for breeding malaria-carrying mosquitos in standing water. Additionally, the equestrian trail crossing over Carmel Valley Road constructed as part of the Seabreeze Farms project was determined to present a safety hazard. Mitigation measures were implemented with construction of the Seabreeze Farms project to reduce those impacts to below a level of significance. The project does not involve construction of detention basins in finger canyons or the provision of equestrian crossings over public roadways. To meet City storm water quality control requirements, the project would include above-ground detention basins with biofiltration media, which serve the dual purposes of hydromodification management and pollutant treatment, respectively. Pursuant to City BMP Design Manual 4.1.3 and 6.3.7, all on-site BMPs must be designed and implemented with measures to avoid pollutions associated with vectors. Drawdown time for the basins must be less than 96 hours to minimize standing water. Therefore, vector control measures are now requirements for all storm water control facilities. Thus, mitigation measures relative to equestrian trail-crossing of public roadways are not applicable to the project, and the potential for mosquitos breeding in detention basins is not controlled through City requirements.

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal. Compliance would be achieved through regulatory compliance with local, State and Federal requirements. Although minimal amounts of such substances may be present during construction of the project, they are not anticipated to create a significant public hazard. Once constructed, due to the nature of the project as a senior living facility, the routine transport, use, or disposal of hazardous materials on or through the subject site is not anticipated.

The project is located within one-quarter mile of a school but would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste from an operational perspective. Additionally, the project site is not located within an airport land use plan or within two miles of a public/public use airport or in the vicinity of a private airstrip.

The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and would not expose people or structures to a significant risk of loss injury, or death involving wildland fires. The project has been reviewed by the City Fire and Rescue department and has been determined to be designed in a manner that meets all fire codes and fire protection requirements. Additionally, in accordance with the SDMC Section 142.0412, the project would implement a Brush Management Plan that provides a combined brush management Zone One and Two dimension of 100 feet², measured from the exterior of the structure towards the native/naturalized vegetation. (See Figure 8, Brush Management Plan). Brush management Zone One is the area adjacent to the structure and consists of consist of pavement and permanently irrigated ornamental planting. Brush management Zone Two is the area between Zone One and any area of native or naturalized vegetation. This area consists of thinned, native or non-irrigated vegetation. Implementation of the required Brush Management Plan is intended to minimize the risk from potential wildfires. Impacts would be less than significant; no mitigation is required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Seabreeze Farms EIR or Seabreeze Farms MND. The project would implement Mitigation Measures IV -M.1 and M.2, 23 and 24, as required in the Seabreeze Farms EIR and MND to reduce potential impacts to public Health and Safety to below a level of significance, as described in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum. The project would not result in any new significant public health and safety impacts nor is there a substantial increase in the severity of public health and safety impacts from that described in the EIR or MND.

²SDMD Section 142.0412(f), allows that Zone Two can be reduced at a ratio of 1 ½ feet for every 1-foot increase in Zone One. An 80-foot Zone One would preclude the need for Zone Two.

Issues Not Analyzed in the Previous EIR

California Environmental Quality Act (CEQA) Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified FEIR determined the project would have a less than significant impacts to Air Quality, Utilities, Energy, and Human Health/Public Safety. Revisions to the project components evaluated under the FEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum, would not have the potential to cause significant impacts to issue areas beyond those analyzed in this Addendum. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

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

The project shall be required to comply with the applicable paleontological mitigation measure outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously adopted MND (LDR No. 96-7919). This mitigation measure has been updated to reflect current standard City paleontological mitigation and monitoring requirements.

Air Quality

Prior to issuance of grading permits, the applicant shall submit to the City's Development Services Department a dust control plan that includes the following measures:

- Active grading sites shall be watered twice daily to reduce dust;
- All trucks hauling loose materials shall be covered and maintain at least two feet of free board;
- Soil stabilizers shall be utilized wherever necessary; and
- Material stockpiles shall be covered and/or watered.

Dust control measures shall achieve a minimum of 80 percent dust suppression and shall be identified on plans submitted for the building permits.

Paleontological Resources

The following measures would be implemented to mitigate potential impacts to subsurface paleontological resources.

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the 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. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from the San Diego Natural History Museum, another institution or, if the search was conducted in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities 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 relevant field condition occurs, 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 of paleontological resources, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
- C. Determination of Significance
1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss the significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries
In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVr and submit to MMC via fax by 8AM on the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
 - d. The PI shall immediately contact MMC, or by 8AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and

conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

- a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum
The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit the revised Draft Monitoring Report to MMC for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The Seabreeze Farms EIR (Dep No. 36-0385/SCH No. 96021001) indicated that significant impacts to the following issues would be substantially lessened or avoided if all the mitigation measures recommended in the EIR were implemented: transportation/traffic circulation, biological resources, cultural resources, air quality, geology/soils, paleontology, noise, public services and facilities, and public health and safety. The EIR concluded that significant impacts related hydrology/water quality, landform alteration/visual quality, and agriculture/natural resources would not be fully mitigated to below a level of significance. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the EIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The Seabreeze Farms MND (LDR No. 96-7919) indicated that significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: land use, transportation/traffic circulation, biological resources, hydrology/water quality, landform

alteration/visual quality, air quality, geology/soils, paleontology, noise, public services and facilities, and public health and safety. No significant unmitigated impacts would occur.

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

VIII. CERTIFICATION

Copies of the addendum, the EIR, the MND, the Mitigation Monitoring and Reporting Program, and associated project-specific technical studies, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.


Chris Tracy, Senior Planner
Development Services Department

4/25/2019
Date of Final Report

Analyst: Chris Tracy

Attachments:

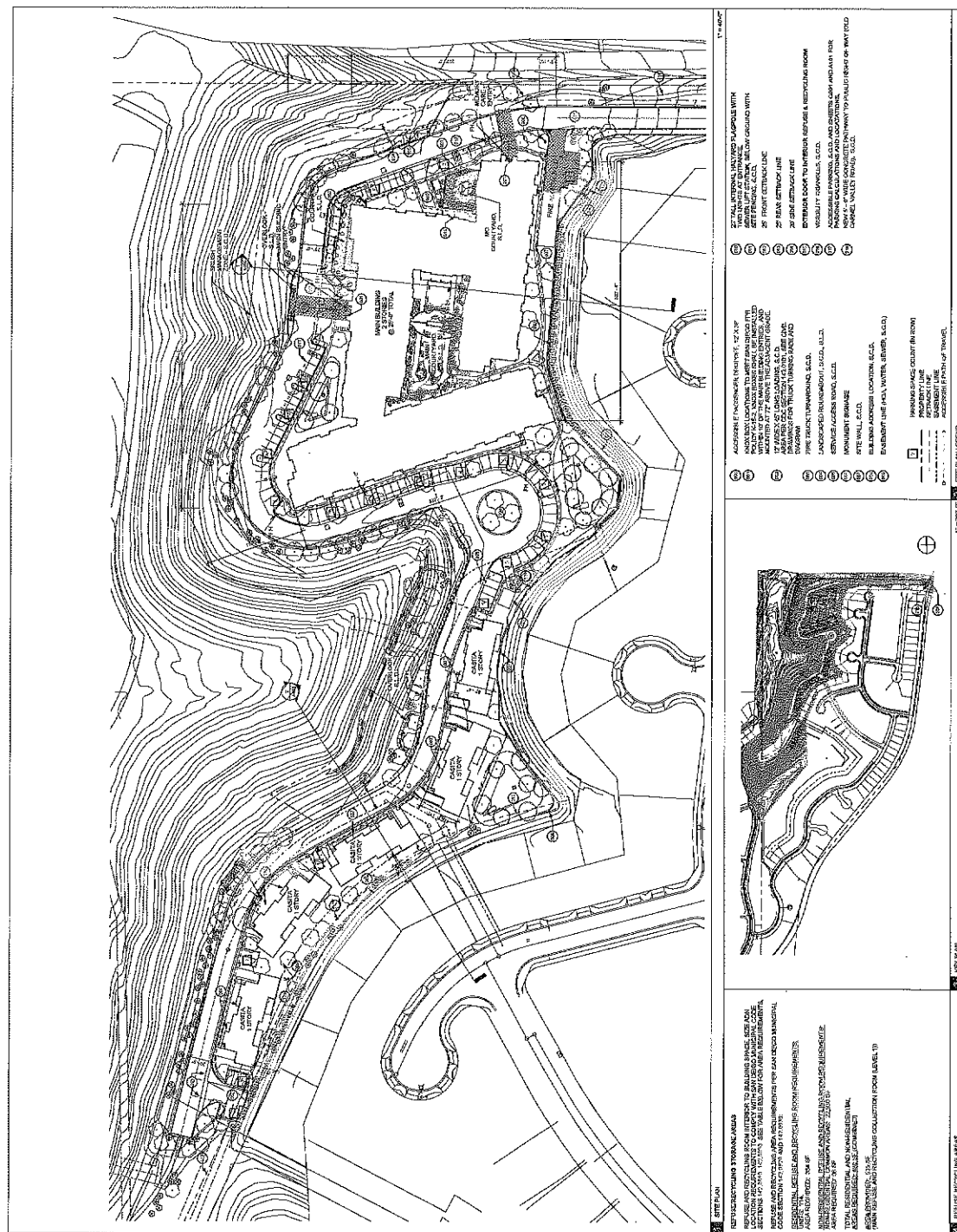
- Figure 1: Site Plan**
- Figure 2: Pedestrian Circulation Exhibit**
- Figure 3: Landscape Concept Plan**
- Figure 4: Grading Plan**
- Figure 5: Project Location Map**
- Figure 6: Aerial Photograph**
- Figure 7: Biological Resources/Impacts**
- Figure 8: Brush Management Plan**

Appendices:

- Appendix A: Air Quality Report
- Appendix B: Biological Technical Report
- Appendix C: CAP Consistency Checklist
- Appendix D: Drainage Report
- Appendix E: Geotechnical Investigation
- Appendix F: Greenhouse Gas Study
- Appendix G: Preliminary Hydromodification Management Study
- Appendix H: Noise Analysis Report
- Appendix I: Sewer Study
- Appendix J: Storm Water Quality Management Plan
- Appendix K: Transportation Impact Analysis
- Appendix L: Water Study
- Appendix M: Waste Management Plan

REFERENCES

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- Birdseye Planning Group. *Air Quality Study*. (April 2019)
- Birdseye Planning Group. *Greenhouse Gas Study*. (April 2019)
- dBF Associates, Inc. *Noise Analysis Report*. (April 1, 2019)
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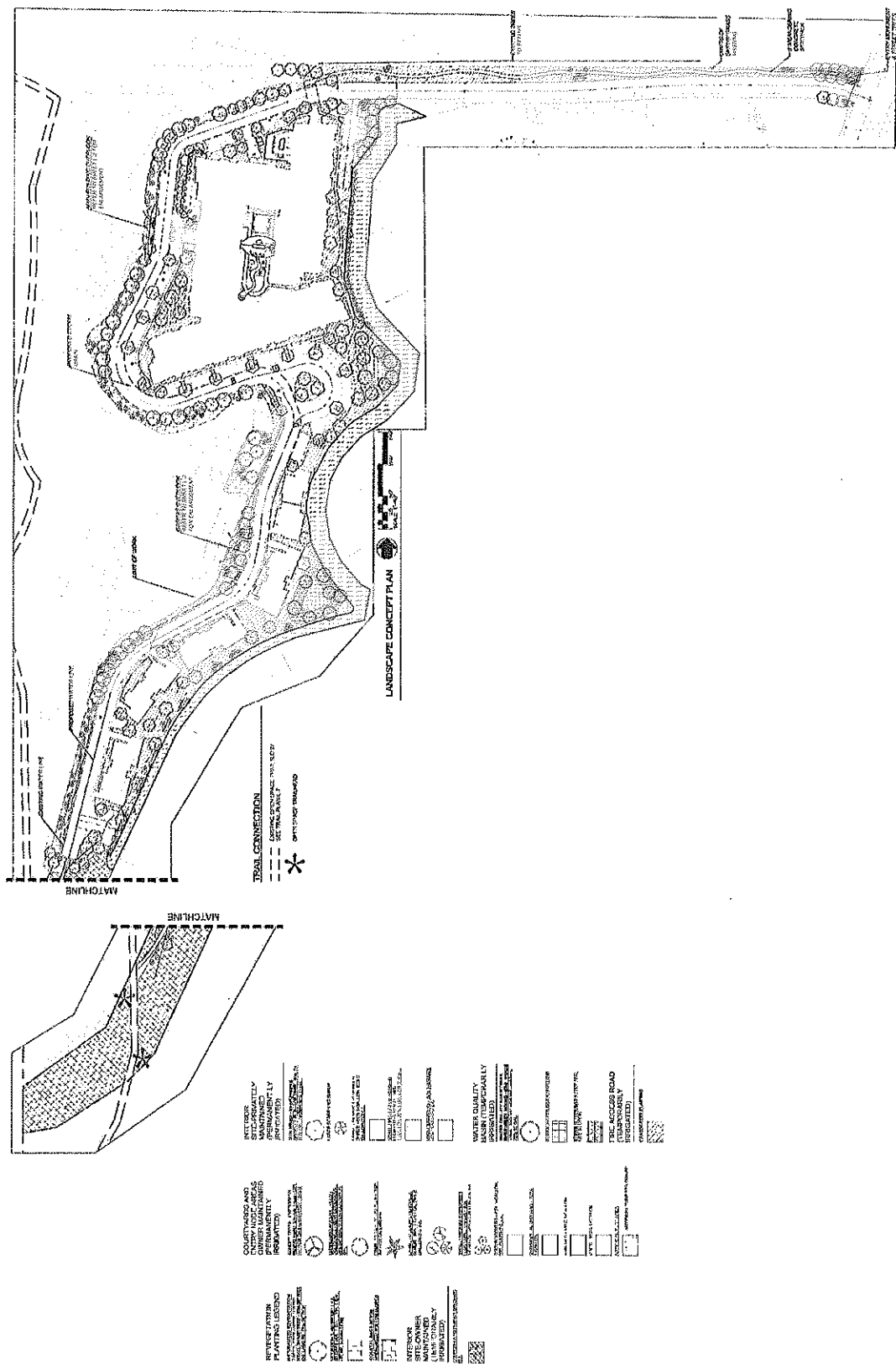


Figure 3. Landscape Concept Plan

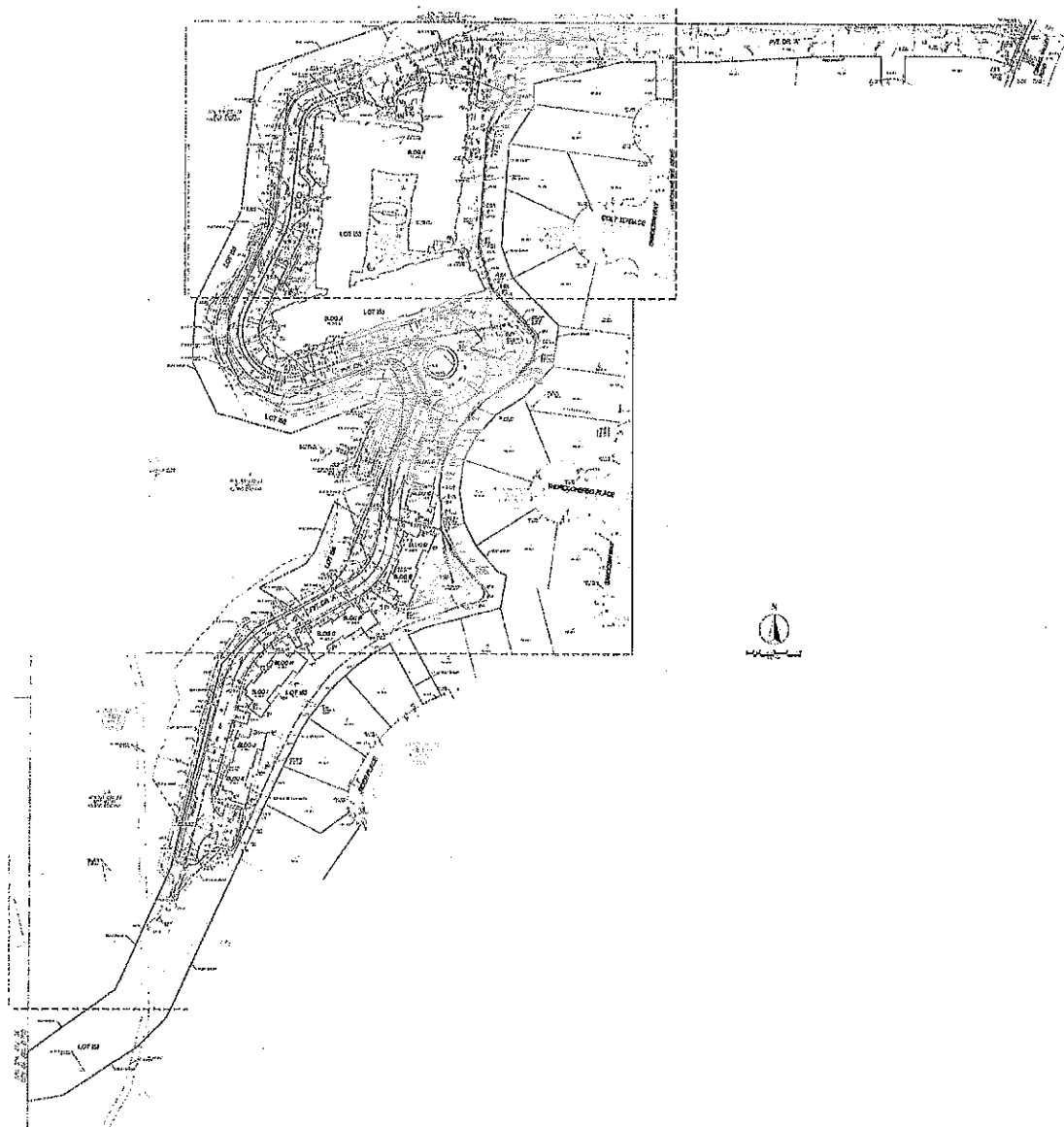


Figure 4. Grading Plan

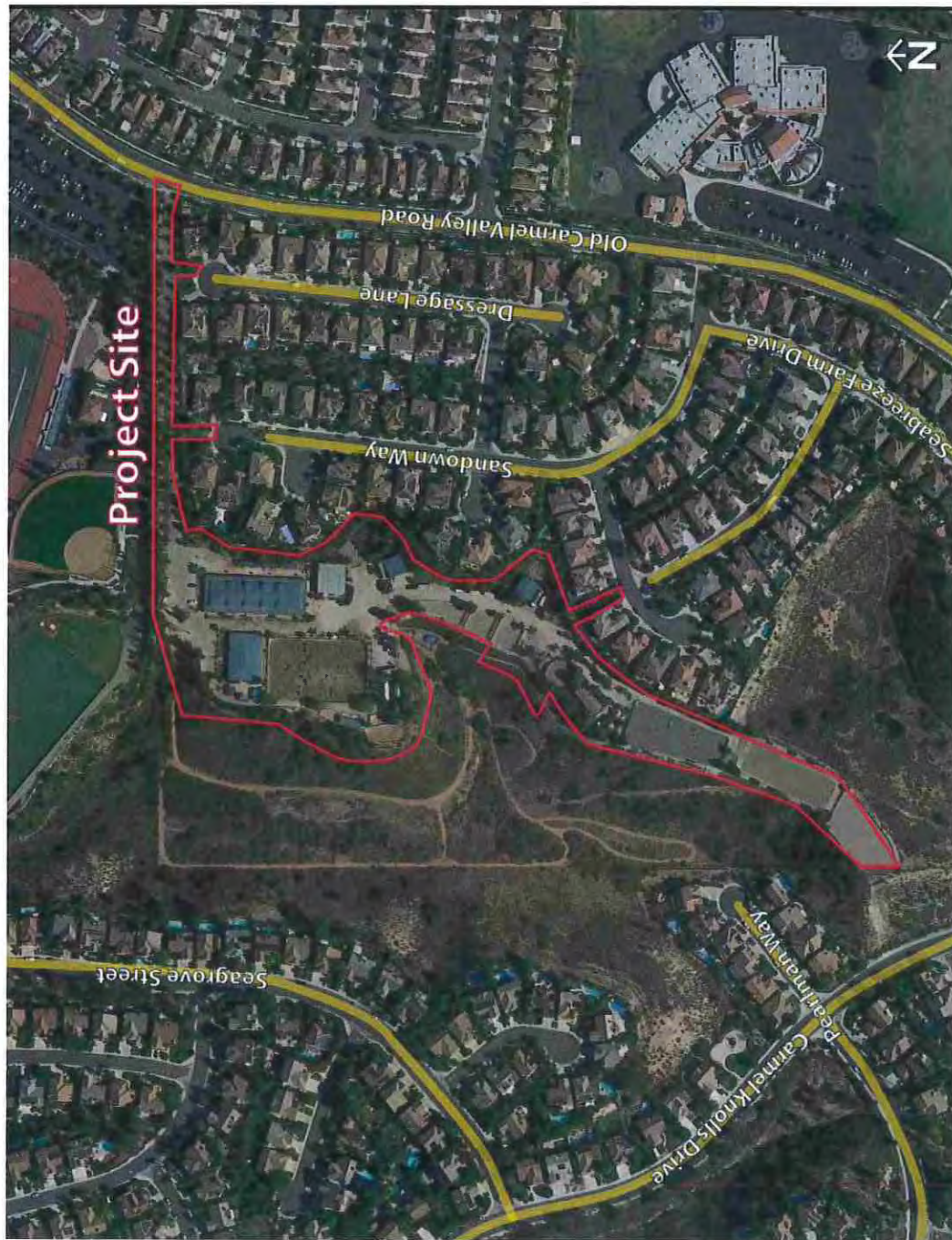


Figure 5. Project Location Map

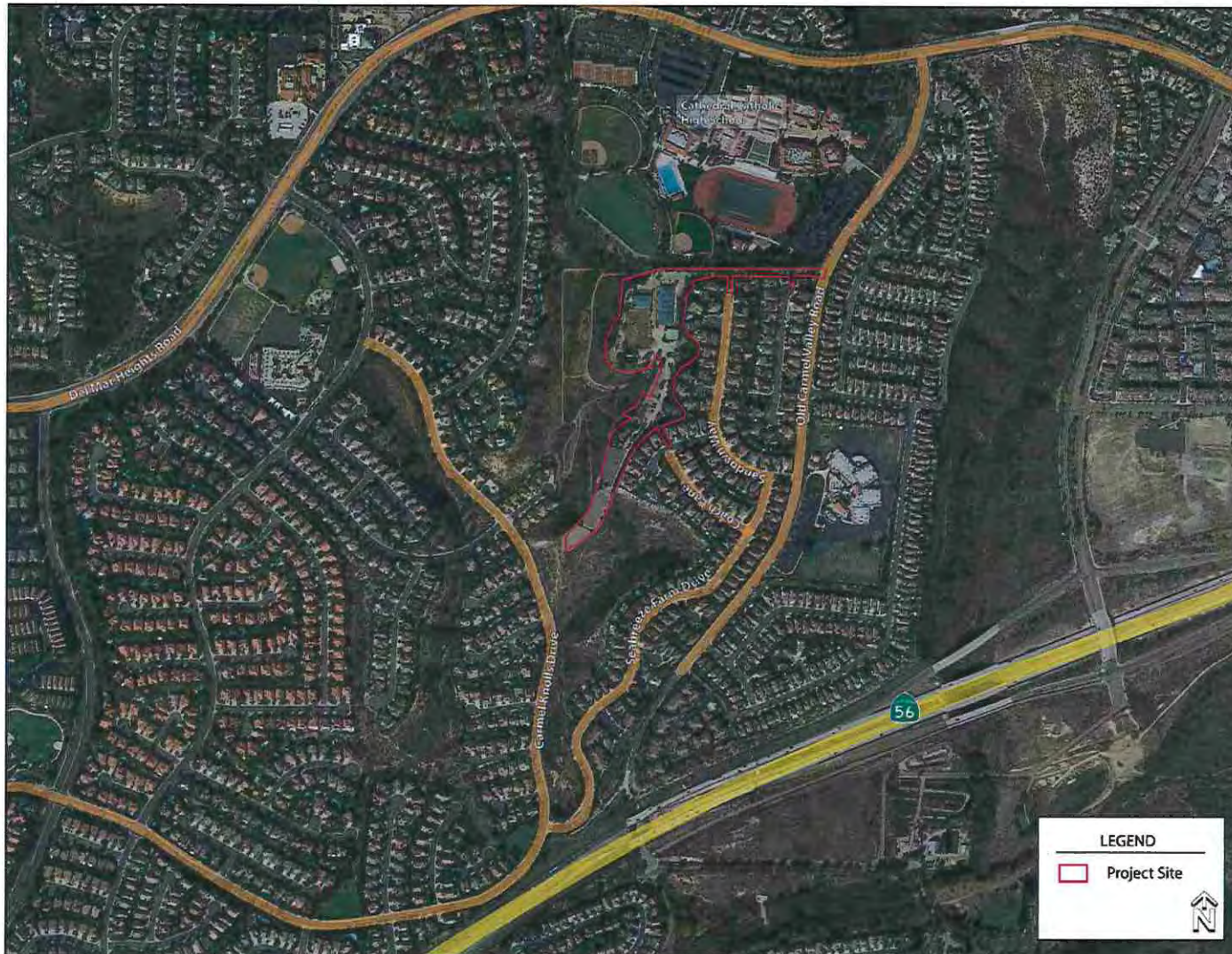


Figure 6. Aerial Photograph

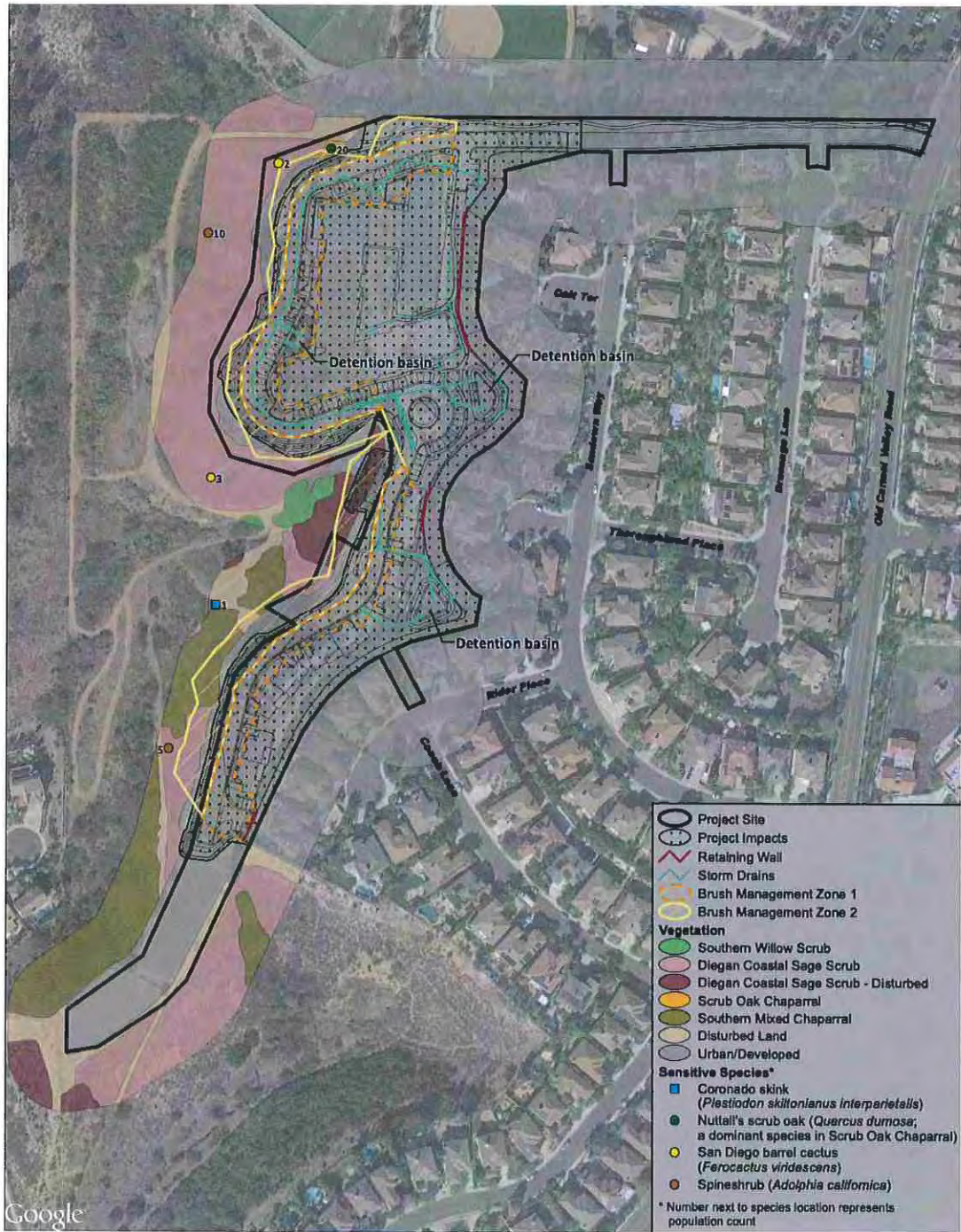


Figure 7. Biological Resources Map

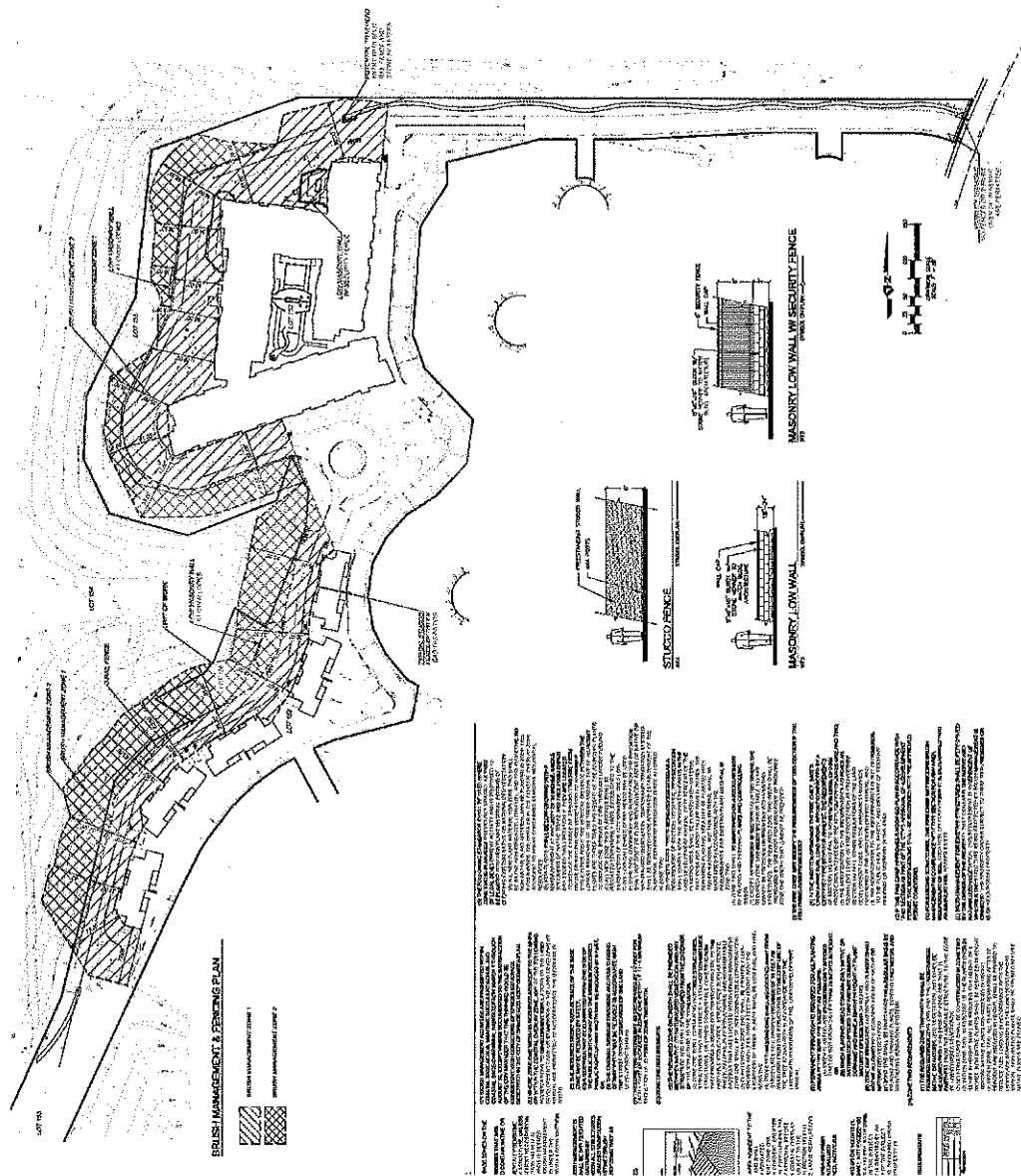


Figure 8. Brush Management Plan