MITIGATION MONITORING AND REPORTING PROGRAM FOR THE MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE PROJECT NUMBER 349988 SCH No. 2014041011

This Mitigation Monitoring and Reporting Program (MMRP) is designed to ensure compliance with Public Resources Code Section 21081.6 during implementation of mitigation measures. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the Mitigation Monitoring and Reporting Program will be maintained at the offices of the Planning Department, 9485 Aero Drive, MS 413, San Diego, California, 92123. All applicable mitigation measures contained in the Program Environmental Impact Report (PEIR) SCH No. 2014041011; Project Number 349988 shall be made conditions of future projects located within the project area as further described below.

I. Land Use

Environmental Plan Consistency

a. Impacts

Subsequent projects implemented in accordance with the Master Plan Update (MPU) for the Mission Trails Regional Park (MTRP; project area) would introduce additional recreational uses within or adjacent to the City of San Diego (City) Multi-Habitat Planning Area (MHPA), which could result in conflicts with the MHPA Land Use Adjacency Guidelines (Impact LU-1).

b. Mitigation Framework

Implementation of the following mitigation framework would reduce Impact LU-1 to less than significant:

MM-LU-1: Subsequent projects implemented in accordance with the Plans which are within or adjacent to the designated MHPA areas shall comply with Section 1.4 Land Use Considerations and Section 1.5 Framework Management Plan of the MSCP Subarea Plan in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA. The project biologist for each subsequent project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP Subarea Plan. Prior to approval of subsequent projects in an area adjacent to a designated MHPA, the City's Environmental Designee (ED) shall identify specific conditions of approval in order to avoid or to reduce potential impacts adjacent to the MHPA.

Specific requirements shall include:

- **Drainage**: All new and proposed parking areas and developed areas in and adjacent to the preserve would not drain directly into the MHPA. All developed and paved areas would prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems would be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance would include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

- **Toxics**: Land uses, such as recreation and agriculture, that use chemicals or generate byproducts such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures would include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance would be provided. Where applicable, this requirement would be incorporated into leases on publicly owned property as leases come up for renewal.

- **Lighting**: Proposed lighting of all developed areas adjacent to the MHPA would be directed away from the MHPA. Where necessary, development would provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

- **Noise**: Uses in or adjacent to the MHPA would be designed to minimize noise impacts. Berms or walls would be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas would incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures would also be incorporated for the remainder of the year.

- **Barriers**: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

- **Invasives**: No invasive nonnative plant species would be introduced into areas adjacent to the MHPA.

- **Brush Management**: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) would be set back from slope edges to incorporate brush management areas on the development pad and outside of the MHPA.

No residential development would occur specifically under the Plans; therefore, this would not be required.

- **Grading/Land Development:** Manufactured slopes associated with site development would be included within the development footprint for projects within or adjacent to the MHPA. c. Mitigation Funding, Timing, and Responsibility

c. Mitigation Funding, Timing, and Responsibility

Funding for the described land use mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for land use-related mitigation monitoring, enforcement, and reporting would be with the City.

II. Biological Resources

Sensitive Plants and Wildlife Species

a. Impacts

Implementation of subsequent projects in accordance with the project could result in direct impacts to sensitive plant and wildlife species known to occur within the project area. Impacts to these species would be significant (Impact BIO-1 and Impact BIO-2).

Implementation of subsequent projects in accordance with the MPU developed adjacent to the MHPA could result in indirect impacts. These impacts could include degradation of habitat value or disruption of animals within the preserve area. Without implementation of the MHPA Adjacency Guidelines, indirect impacts to sensitive wildlife species could be significant (Impact BIO-3).

b. Mitigation Framework

In order to mitigate impacts related to sensitive plants and wildlife species, the following mitigation framework (MM-BIO-1 and MM-BIO-2) would be implemented. In addition, MM-LU-1 would reduce impacts to sensitive plants and wildlife species to less than significant.

MM-BIO-1: To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the study area, subsequent projects that are proposed in any location in the Plan areas with the potential to support sensitive biological resources, whether the area is disturbed or not disturbed shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012, 2018b). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within the study area, focused presence/absence surveys shall be conducted in accordance with the

Biology Guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the NRMP, Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act, California Endangered Species Act, MSCP Subarea Plan, and Environmentally Sensitive Lands Regulations.

- Mitigation for Impacts to Sensitive Upland Habitats

  Subsequent projects implemented in accordance with the Plans resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan (see Table 5.5-8 of this PEIR). Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities shown in Table 5.5-6 of this PEIR, consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City's Biology Guidelines.

  Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

  Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012, 2018b). These mitigation ratios are based on tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Mitigation for short-term Impacts to sensitive species from project construction would be addressed through implementation of MM-LU-1 (above) and MM-BIO-2 (below).

MM-BIO-2: Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the study area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in MM-BIO-1 during the discretionary review process. The biology report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans (such as a burrowing owl mitigation plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, state Fish and Game Code, and/or the Environmentally Sensitive Lands (ESL) Regulations**.**

c. Mitigation Funding, Timing, and Responsibility

Funding for implementation of MM-BIO-1 and MM-BIO-2 would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

Migratory Wildlife

a. Impacts

Implementation of subsequent projects in accordance with the MPU could result in the impediment of on-site wildlife nesting, foraging, and movement. Impacts of this nature could be significant (Impact BIO-4).

b. Mitigation Framework

Implementation of Mitigation Framework MM-BIO-2 would reduce potentially significant impacts to migratory wildlife associated with future projects to less than significant.

Sensitive Habitat

a. Impacts

Implementation of subsequent projects in accordance with the MPU could impact sensitive plant species known to occur within the Project area. These habitats include native grassland, valley needlegrass grassland, wildflower field, Diegan coastal sage scrub, chamise chaparral, southern mixed chaparral, scrub oak chaparral, and non-native grassland. Impacts to these sensitive habitats would be significant (Impact BIO-5).

b. Mitigation Framework

Implementation of Mitigation Framework MM-BIO-1 would reduce potentially significant impacts to sensitive habitat to less than significant.

Invasive Plants

a. Impacts

Although Multiple Species Conservation Program (MSCP) Subarea Plan and City regulations contain policies for control of invasive plant species, implementation of subsequent projects in accordance with the Plans could result in the introduction of non-native, invasive, plant species to the project area. These impacts could be significant (Impact BIO-6).

b. Mitigation Framework

Implementation of Mitigation Framework MM-LU-1 would reduce potentially significant impacts related to invasive plants to less than significant.

Wetlands

a. Impacts

Although impacts to vernal pools and vernal pool species are not anticipated to occur, subsequent restoration efforts implemented in accordance with the Plans have the potential to impact covered species addressed in the Vernal Pool Habitat Conservation Plan (VPHCP). Impacts to these species would be significant (Impact BIO-7).

Additionally, although the MPU includes recommendations intended to avoid impacts to wetlands and in some cases to restore existing disturbed wetland habitats, implementation of the Plans and associated subsequent discretionary actions could result in limited impacts to jurisdictional wetlands during activities such as wetland restoration and installation of trail/river crossing improvements. Impacts to jurisdictional wetlands would be significant (Impact BIO-8).

b. Mitigation Framework

In order to mitigate impacts related to City, state, and federally regulated wetlands, the following mitigation framework (MM-BIO-3) would be implemented. Implementation of Mitigation Framework MM-BIO-3, and when applicable MM-LU-1, would reduce potentially significant impacts to wetlands and vernal pools to less than significant.

MM-BIO-3: To reduce the potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the Plans shall be required to comply with Clean Water Act (CWA) Section 404 requirements and special conditions, Regional Water Quality Control Board (RWQCB) in accordance with Section 401 of the CWA, California Department of Fish and Wildlife (CDFW) Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net loss of wetland habitats.

Prior to obtaining discretionary permits for future actions implemented in accordance with the Plans, a site-specific biological resources survey shall be completed in accordance with City of San

Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012, 2018b). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the U.S. Army Corps of Engineers (USACE) 1987 *Wetlands Delineation Manual* and the 2008 *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be completed following the appropriate USACE guidance documents for determining the Ordinary High Water Mark boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options: Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetlands be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.5-9a and b of this PEIR. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.

- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved; and the biologically superior mitigation shall include either: (1) standard mitigation per Table 5.5-9a of this PEIR, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 5.5-9b of this PEIR is required.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City's Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- Wetland creation is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.

- Wetland restoration is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

- Wetland enhancement is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.

- Wetland acquisition may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director/ED prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;

- Compliance with the RWQCB Section 401 Water Quality Certification; and

- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

***Vernal Pools and Vernal Pool Species*:** Impacts to vernal pools shall require assessments of vernal pool flora and fauna, hydrology, habitat function, and restoration potential and protocol fairy shrimp surveys, in addition to the requirements listed above. Impacts to fairy shrimp shall require either a Section 10(a)1(A) permit or Section 7 consultation Biological Opinion from USFWS. On January 22, 2018, the San Diego City Council adopted the VPHCP, which provides a framework to protect, enhance, and restore vernal pool resources within the City's jurisdiction. The VPMMP was also adopted in conjunction with the VPHCP. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's VPHCP pursuant to section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit number TE-97791C to the City in accordance with the VPHCP, which will cover incidental take for two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with five listed plant species.

Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series), and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

c. Mitigation Funding, Timing, and Responsibility

Funding for implementation of MM-BIO-3 would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

III. Historical Resources

Prehistoric or Historical Resources

a. Impacts

The project site could have areas containing historical resources. Implementation of subsequent projects in accordance with the Plans could result in an adverse effect or the destruction of a prehistoric or historic archaeological site or historical building. Impacts to these resources would be significant (Impact HIST-1).

b. Mitigation Framework

MM-HIST-1a: Archaeological and Tribal Cultural Resources

Prior to issuance of any development permit for a subsequent project tiering off the Plans that could directly affect an archaeological or tribal cultural resource; the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst shall determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory System and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. An archaeological sensitivity map was created from the record search data as a management tool to aid in siting of future projects. There are three levels of sensitivity (see Figure 5.6-1). The levels are not part of any federal or state law. The levels are described below.

- **High Sensitivity**: These areas contain known significant cultural resources and have a potential to yield information to address a number of research questions. These areas may have buried deposits, good stratigraphic integrity, and preserved surface and subsurface features. If a project were to impact these areas, a survey and testing program would be required to further define resource boundaries subsurface pressure or absence and determine level of significance. Mitigation measures such as ADRP and construction monitoring shall also be required.

- **Medium Sensitivity:** These areas contain recorded cultural resources or have a potential for resources to be encountered. The significance of the cultural resources within these areas is not known. If a project were to impact these areas, a survey and significance evaluation would be required if cultural resources were identified during the survey. Mitigation measures may also be required.

- **Low Sensitivity**: These areas have slopes greater than 25 degrees. Steep slopes have a low potential for archaeological deposits because they were not occupied by prehistoric peoples but rather used for gathering and other resource procurement activities. The majority of these activities do not leave an archaeological signature. If a project were to impact these areas, a survey would be needed to confirm the lack of cultural resources. Should cultural resources be identified, a significance evaluation would be required followed by mitigation measures.

Review of this map should be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. If there is any evidence that the project area contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1

Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, field survey, archaeological testing, and analysis. Before actual field reconnaissance would occur, background research is required that includes a record search at the South Coastal Information Center at San Diego State University. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance including, but not limited to, remote sensing, ground penetrating radar, human remains detection canines, LiDAR, and other soil resistivity techniques as determined on a case-by-case basis by the tribal representative during the project-specific AB 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or tribal cultural resources. If, through background research and field surveys, resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or tribal cultural resource (as defined in the Public Resources Code) is identified, the City shall initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52 (AB 52). It should be noted that during the consultation process, tribal representative(s) will be involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City of

San Diego's Historical Resources Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the area of potential effects, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report must be submitted to Historical Resources Board (HRB) staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required. The final testing report and supporting documentation are used by HRB staff in consultation with qualified City staff with technical expertise in archaeology or cultural resources management to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria. This process is completed prior to distribution of a draft environmental document.

Step 3

Preferred mitigation for archaeological resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site located on City property, or within the area of potential effects of a City project, would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must

be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions would be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover), along with historical resource reports for archaeological sites and tribal cultural resources, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project, the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state

and federal standards unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historical deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project Mitigation Monitoring and Reporting Program. The disposition of human remains and burial- related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA [U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

MM-HIST-1b: Built Environment Resources

Prior to issuance of any development permit for a subsequent project tiering off the MPU that could directly affect historic buildings, structures, districts, or objects, the City shall require the following steps be taken to determine: (1) the presence of built environment resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. The mitigation would be the same as of HIST-1a. The mitigation framework shall include an evaluation following the requirements in the Historical Resources Regulations and Guidelines as indicated below.

Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. The evaluation of historic architectural resources would be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity as indicated in the Historical Resources Guidelines and Historic Resources Regulations (San Diego Municipal Code Sections 143.0201–143.0280).

Preferred mitigation for historic buildings or structures is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures can include, but are not limited to, the following:

a. Preparing a historic resource management plan.

b. Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric).

c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation.

d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource.

Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

c. Mitigation Funding, Timing, and Responsibility

Funding for the implementation of MM-HIST-1a and MM-HIST-1b would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for all cultural resource-related mitigation monitoring, enforcement, and reporting would be with the City.

Religious or Sacred Uses

a. Impacts

The project site could have areas containing archaeological resources associated with religious or sacred uses. Implementation of subsequent projects in accordance with the Plans could result in an adverse effect or damage to archaeological religious or sacred uses of the Park. Impacts to these resources would be significant (Impact HIST-2).

b. Mitigation Framework

Implementation of Mitigation Framework MM-HIST-1a and MM-HIST-1b would reduce potential impacts related to religious or sacred uses to less than significant.

Human Remains

a. Impacts

The project site could have areas containing archaeological resources associated with religious and sacred uses and could support human remains. Implementation of subsequent projects in

accordance with the Plans could result in loss or damage to these remains which would be considered significant (Impact HIST-3).

b. Mitigation Framework

Implementation of Mitigation Framework MM-HIST-1a and MM-HIST-1b would reduce potential impacts related to human remains to less than significant.

Tribal Cultural Resources

a. Impacts

The project site could have areas containing archaeological resources associated with tribal use of cultural significance. Implementation of subsequent projects in accordance with the Plans could result in loss or damage to objects with cultural value to a California Native American tribe. Impacts to these resources would be significant (Impact HIST-4).

b. Mitigation Framework

Implementation of Mitigation Framework MM-HIST-1a and MM-HIST-1b would reduce potential impacts related to tribal cultural resources to less than significant.

IV. Human Health, Public Safety and Hazardous Materials

Health and Safety Hazards

a. Impacts

Certain MPU recommendations contemplate subsequent projects, such as offices for Park rangers, shade structures, and picnic areas that could be subject to wildfire damage. Therefore, impacts associated with the exposure of structures to wildfire hazards would be significant (Impact HAZ-1).

b. Mitigation Framework

The following Mitigation Framework would reduce project-level impacts related to wildfire (Impact HAZ-1):

MM-HAZ-1: Specific regulations associated with fire prevention are provided in Section 55.0101 (Adoption of the California Fire Code), Section 55.0901 (Fire Department Access and Water Supply), and Section 55.1001 (Fire Protection Systems and Equipment) of the Municipal Code.

The Municipal Code provides fire safety regulations in Municipal Code Section 142.0412 (Brush Management Regulations). Individual projects implemented pursuant to the Master Plan would be required to demonstrate compliance with applicable fire codes and would be required to implement applicable Brush Management Regulations under Section 142.0412 of the Municipal Code. These regulations include the following:

- Brush management is required in all base zones on publicly or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation.
- Brush management activity is permitted within ESL (except for wetlands) that are located within 100 feet of an existing structure in accordance with Section 143.0110(c)(7). Brush management in wetlands shall be requested with a development permit in accordance with Section 143.0110 where the Fire Chief deems brush management necessary in accordance with Section 142.0412(i). Where brush management in wetlands is deemed necessary by the Fire Chief, that brush management shall not qualify for an exemption under ESL Regulations, Section 143.0110(c)(7).
- Brush Management Zones. Where brush management is required, a comprehensive program shall be implemented that reduces fire hazards around structures by providing an effective fire break between all structures and contiguous areas of native or naturalized vegetation. This fire break shall consist of two distinct brush management areas called "Zone One" and "Zone Two."
- Brush Management Zone Two is the area between Zone One and any area of native or naturalized vegetation and typically consists of thinned, native, or naturalized non-irrigated vegetation.
- Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15 (bird nesting season), except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the Multiple Species Conservation Program Subarea Plan.

c. Mitigation Funding, Timing, and Responsibility

Funding for the described mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

Hazardous Sites

a. Impacts

The study area currently represents an ongoing hazard due to the potential presence of unexploded ordnance (UXO). As a result, subsequent projects contemplated by the Plans could expose people to hazards associated with UXO resulting in a significant impact (Impact HAZ-2).

The presence of other sites compiled pursuant to Government Code Section 65962.5 would result in potentially significant human health and environmental hazard impacts associated with implementation of subsequent projects contemplated by the Plans resulting in a significant impact (Impact HAZ-3).

b. Mitigation Framework

The following Mitigation Framework includes standard requirements and procedures that shall be implemented to ensure the proper handling of the removal of UXO. This Mitigation Framework would reduce impact HAZ-2 to less than significant:

MM-HAZ-2: Prior to initiating subsequent projects contemplated by the Plans that could involve subsurface disturbance within the former Camp Elliott FUDS, the City shall verify that the U.S. Army Corps of Engineers (USACE) has completed subsurface UXO clearance of the entire site, or a Remedial Action Work Plan (RAWP) shall be prepared and implemented in accordance with requirements and procedures of the Department of Toxic Substances Control (DTSC), in consultation with the USACE.

The RAWP, including a Health and Safety Plan, shall be prepared prior to grading or ground disturbance in accordance with requirements and procedures of the DTSC. The RAWP shall thoroughly describe investigations and disposal activities. The draft RAWP shall be reviewed and approved by City Local Enforcement Agency (LEA) staff and the DTSC, in consultation with the USACE.

At a minimum, the RAWP shall include the following performance criteria:

- Prior to initiation of UXO clearance activities, all Park personnel and adjacent property owners shall be notified.
- Implementation of the RAWP shall be performed by a qualified contractor.
- Access into the work sites shall be limited to the contractor personnel specifically authorized to enter the work site.
- Prior to initiation of detonation operations, all nonessential personnel shall be evacuated to a distance outside the fragmentation zone of the UXO to be detonated; radio communication shall be maintained between all concerned parties.
- Where detonation activities in proximity to schools are needed, they shall occur outside of typical school hours, as feasible.
- Affected areas shall be secured prior to authorizing detonation of explosive charges. Signs shall be posted announcing blasting danger and guards shall be stationed at all likely pedestrian/recreational user entrances.
- When a detonation-in-place is to occur, contractor personnel shall be posted in a 360-degree radius around the detonation site, at a safe distance.
- No disposal procedures shall be applied until the item has been positively identified. After the inspection has been completed, and providing there are no residual hazards, the UXO Senior Supervisor shall authorize the resumption of site operations. In the event that an UXO cannot be destroyed on-site, or if an unidentified UXO is located, the Safety Representative shall be notified for appropriate assistance.

The RAWP shall detail the environmental investigations and define the procedures for disposing of UXO determined unsafe to move or handle (e.g., detonation-in-place disposal). Also to be included

as part of the RAWP is an Explosive Safety Submission Report that outlines the safety aspects associated with investigating and removing UXO. The potential for encountering UXO during the removal action poses a risk to on-site workers, nearby populations, and the environment. The Health and Safety Plan is an integral component of the RAWP and shall include safety precautions that all personnel must adhere to during implementation of the work plan. Violation of UXO-related safety precautions shall be grounds of dismissal.

The Health and Safety Plan shall also provide instructions for workers on standard work practices, hazard communication, identification, handling, removal, transportation, and detonation. These precautions may include, but are not limited to, the following:

- Prior to detonation of an UXO, sandbags filled with construction grade sand shall be utilized to tamp the detonation and minimize damage to nearby trees and shrubs. The preparation shall be thoroughly soaked with water and the immediate area watered well to minimize the possibility of secondary fires.
- Carry blasting caps in approved containers and keep them out of the direct rays of the sun.
- Do not use explosives or accessory equipment that are obviously deteriorated or damaged. They may detonate prematurely or fail completely.
- Disposal operations shall not be initiated until at least one-half hour after sunrise and shall be concluded by at least one-half hour prior to sunset.
- Restrict and control access to the disposal site to a minimum of authorized personnel necessary for safe conduct of the disposal operations.
- Do not carry fire- or spark-producing devices into a disposal site except as specifically authorized.

The procedure for completing subsurface investigations and clearance is described below:

- The project site shall be surveyed and marked out in 100-by-100-square-foot grids.
- A Schonstedt detector shall be used to locate surface and subsurface anomalies.
- Motor vehicles shall be restricted to existing, actively used roads, during normal operations.
- Personnel shall drive as near as practical to the work site and walk into and out of the grid(s).
- In the event of a medical or fire emergency, vehicles shall be utilized wherever necessary.

Depending on the terrain at the project location, different sweep techniques shall be used. Varying sweep line intervals may be required. If the terrain is too steep to sweep safely, that portion of the grid not swept shall be mapped; and it would become the team leader's responsibility to devise the clearance method(s) suitable to the specific grid to assure complete clearance.

During the removal, all personnel shall receive highly specialized training. Personnel shall be briefed of safety regulations every day. Hazards of unexploded munitions shall be explained at each briefing, including other risks, such as those posed by rattlesnakes and poison oak, etc. Should UXO items be discovered during removal actions, proper procedures (as detailed in the RAWP) shall be

followed to ensure safe disposal. For example, a metal containment system may be placed around the item and then detonated by remote control from a safe distance.

All UXO shall undergo an initial assessment to identify the ordnance. No disposal procedures shall be applied until the item has been positively identified. In the event that an UXO cannot be destroyed on-site, or if an unidentified UXO is located, a Safety Representative shall be notified for appropriate assistance in accordance with applicable regulations.

The following Mitigation Framework includes standard requirements and procedures that shall be implemented to minimize risk to human health and the environment (Impact HAZ-3):

MM-HAZ-3: Subsequent projects contemplated by the Plans that involve ground disturbance may occur in areas of known environmental concern such as LUST sites or other potentially contaminated sites. Regulations within the Municipal Code require that future projects shall demonstrate that the site is suitable for the proposed use. For sites with recorded hazardous material concerns, the City or project applicant shall obtain confirmation from the County Department of Environmental Health (DEH) that the site has been remediated to the extent required for the proposed use. Clearance may be provided by County DEH when no hazardous materials are known, or expected to be present, or when remediation is required to be completed prior to clearance. Only upon receipt of DEH clearance would projects be recommended for approval.

c. Mitigation Funding, Timing, and Responsibility

Funding for the described hazards-related mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

V. Hydrology and Water Quality

Runoff and Drainage Patterns

a. Impacts

Subsequent projects contemplated by the MPU, such as parking areas, would have the potential to increase the amount of impervious surfaces, which could result in additional runoff to a point that would change drainage patterns from the additional flow rate or volume, resulting in a significant impact (Impact HYD/WQ-1).

b. Mitigation Framework

Implementation of the following mitigation framework would reduce impact HYD/WQ-1 to below a level of significance:

MM-HYD/WQ-1: Prior to approval of subsequent projects implemented in accordance with the Plans that involve impervious surfaces creation, the applicant shall demonstrate to the satisfaction

of the City Engineer, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and Regional Water Quality Control Board (RWQCB) regulations identified below. Future design of projects shall incorporate all applicable and practicable measures outlined below in accordance with the storm water construction requirements of the State Construction General Permit, Order No. 2009-00090DWQ, or subsequent order, and the Municipal Storm Water Permit, Order No. R9-2013-0001, or subsequent order, RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the Land Development Code [LDC]), and the LDC, and shall be based on the recommendations of a detailed water quality and hydraulic analysis. The applicant shall also coordinate with the Storm Water Division when considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance.

a. San Diego RWQCB

- Comply with all National Pollutant Discharge Elimination System (NPDES) permit(s) requirements, including the development of a storm water pollution prevention plan (SWPPP) if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.
- If a future project includes in-water work, a Section 404 Permit (from USACE) and a Streambed Alteration Agreement (from California Department of Fish and Wildlife) shall be required.
- Comply with the San Diego RWQCB water quality objectives and bacteria Total Maximum Daily Load (TMDL) and Los Peñasquitos Lagoon Sediment TMDL.

b. City of San Diego

To prevent flooding, subsequent projects implemented in accordance with the Plans shall be designed to incorporate any applicable measures from the City of San Diego LDC, ESL Regulations (Ch. 14, Art. 03, Div. 01, Sec. 143.0145 and 143.0146). Flood control measures that shall be incorporated into future projects within a Special Flood Hazard Area (SFHA), or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following requirements and all other applicable requirements and regulations of the Federal Emergency Management Agency (FEMA) and those provided in Chapter 14, Article 3, Division 1 of the LDC.
- In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in

any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13).

- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the SFHA, a Conditional Letter of Map Revision (CLOMR) from FEMA shall be obtained.
- Fill placed in the SFHA for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials. Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.
- Improvement plans shall note "Subject to Inundation" for all areas lower than the base elevation plus two feet.
- If structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, a Letter of Map Revision based on Fill (LOMR-F) must be obtained prior to occupancy. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.
- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:
    - Stream scour is minimized.
    - Erosion protection is provided.
    - Water flow velocities are maintained as specified by the City Engineer.
    - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.
    - Wildlife habitat and corridors are maintained.
    - Groundwater recharge capability is maintained or improved.
- Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:
    - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
    - The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to

flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.

- Grading and filling are limited to the minimum amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained.
- The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.
- There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.

c. Mitigation Funding, Timing, and Responsibility

Funding for the described mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

Natural Drainage Systems

a. Impacts

Subsequent projects contemplated by the MPU, such as parking areas, would have the potential to adversely affect natural drainage patterns resulting in a significant impact (Impact HYD/WQ-2).

b. Mitigation Framework

Implementation of mitigation framework MM-HYD/WQ-1 would reduce impact HYD/WQ-2 to below a level of significance.

Flow Alteration

a. Impacts

Subsequent projects implemented in accordance with the MPU would have the potential to impact FEMA-designated 100-year floodplains, the San Diego River, several creeks, and other SFHAs that are within the study area. Because the drainage characteristics and the specific location of each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU would be significant (Impact HYD/WQ-3).

b. Mitigation Framework

Implementation of mitigation framework MM-HYD/WQ-1 would reduce impact HYD/WQ-3 to below a level of significance.

Water Quality

a. Impacts

Although various MPU recommendations generally intend to protect water quality, other subsequent projects implemented in accordance with the MPU would have the potential to result in water quality impacts. Because each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU would be significant (Impact HYD/WQ-4).

b. Mitigation Framework

The following Mitigation Framework would reduce Impact HYD/WQ-4 to below a level of significance:

MM-HYD/WQ-2: Subsequent projects implemented in accordance with the Plans shall identify site-specific measures that reduce significant project-level water quality impacts to less than significant levels in accordance with the existing regulatory framework addressing drainage, storm water, and protection of water quality. Where mitigation is determined to be necessary and feasible, measures shall be included in an MMRP for the project.

The following general measures would be implemented for future projects within the scope of the Plans. These measures would be updated, expanded, or refined when applied to specific future projects based on project-specific design and changes in existing conditions in order to demonstrate compliance with local, state, and federal laws in place at the time future projects are proposed.

Future projects shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall require measures to ensure that impacts to receiving waters are fully mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Storm Water Standards Manual. The applicant shall also coordinate with the Storm Water Division when considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance.

Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing on-site filtration;

- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego RWQCB

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Storm Water Regulations.
- In accordance with the City of San Diego Storm Water Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

c. Mitigation Funding, Timing, and Responsibility

Funding for the described water quality mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for land use-related mitigation monitoring, enforcement, and reporting would be with the City.

VI. Transportation

Circulation and Access

a. Impacts

Subsequent projects implemented in accordance with the MPU could create alterations to present circulation movements due to the creation of new access points from area roads to provide for new off-street parking areas. Impacts related to circulation and access would be significant (Impact TRAF-1).

b. Mitigation Framework

Subsequent projects implemented in accordance with the Plans and associated discretionary actions would require further evaluation at the project-level to determine project-specific impacts and mitigation. The following Mitigation Framework would be applied to address Impact TRAF-1:

MM-TRAF-1: Subsequent projects implemented in accordance with the Plans that would have the potential to alter existing circulation or affect existing access points, including (but not necessarily limited to) MPU Facility Recommendations CM-F1, CM-F2, CM-F3, and MG-F6 shall be required to submit the necessary analysis, design plans pursuant to City Engineering standards. Measures that shall be required to the satisfaction of the City Engineer during subsequent project review to minimize potential impacts from pedestrian/bicyclist/vehicle conflicts, and to enhance circulation, include (but not necessarily limited to):

- Appropriate signage
- Review for adequate sight distance, preparation of sight distance studies, and mitigation, where needed
- Road striping, where needed
- Crosswalks, where needed
- Sidewalks/pathways for pedestrian access
- Bollards, where needed

c. Mitigation Funding, Timing, and Responsibility

Funding for the described transportation mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

VII. Public Utilities

a. Impacts

Subsequent projects implemented in accordance with the MPU would have the potential to be located near water/wastewater utilities. Grading activities during these subsequent projects, though rather limited, would have the potential to disrupt existing utilities. Therefore, impacts would be significant (Impact UTIL-1). Some subsequent projects identified by the MPU would have the potential to result in expanded storm water drainage facilities. These impacts would be significant (Impact UTIL-2).

b. Mitigation Framework

MM-HYD/WQ-1 and MM-HYD/WQ-2 would mitigate impacts related to expanded storm water drainage facilities (Impact UTIL-2). Additionally, in order to mitigate potential impacts related to water/wastewater utilities, the following mitigation measure would be implemented:

MM-UTIL-1: Prior to approval of subsequent projects implemented in accordance with the Plans, the Public Utilities Department shall determine, based on review of detailed plans, that future projects are sited and designed to avoid conflicts with existing public utilities in accordance with the Master Plan and City of San Diego Public Utilities Department guidance identified below. Future design of projects shall be based on the recommendations of an anticipated detailed grade and alignment study that addresses potential conflicts with existing utilities and access road realignments implemented in accordance with Council Policies 400-13 and 400-14. The realignments of utilities or access roads implemented in compliance with Council Policies 400-13 and 400-14 could result in secondary impacts on biological, archaeological, or tribal cultural resources.

The following measures shall be incorporated into future projects to minimize potential conflicts with utilities coordination regarding the location of the trails and pathways with the Park Planning Section of the Planning Department or the Public Utilities Department designee to determine compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities. Access to the sewer facilities shall also be coordinated to provide combined access to storm water pollution facilities in order to minimize the impact on open space and canyons by having common access. The access shall be proposed in a location that will facilitate Council Policies 400-13 and 400-14. If future trail alignments are coordinated with planned or existing utility access roads then the following shall be required:

- Areas within 10 feet of sewer mains shall be kept clear of trees.
- Locate future access in accordance with the Sewer Design Guide requirement for access roads.
- Design trails and pathways to also serve as a sewer access road centered over the ultimate sewer location if determined feasible at the project level.
- Incorporate the sewer depth, slope, and location requirements of the Sewer Design Guide (February 2013).
- Any grade or alignment study shall include cross sections showing existing and proposed utilities and access roads.

c. Mitigation Funding, Timing, and Responsibility

Funding for utilities-related mitigation would be provided on a project-specific basis as specific projects are funded and implemented by the City. Mitigation timing would be driven by the implementation schedule of individual (project-level) development related to specific impacts within the project area, with mitigation for individual projects generally to be implemented prior to or during construction. Responsibility for mitigation monitoring, enforcement, and reporting would be with the City.

References Cited

2018 City of San Diego Biology Guidelines for the Environmentally Sensitive Lands Regulations (ESL), the Open Space Residential (OR-1-2) Zone, and the California Environmental Quality Act (CEQA).

2016 California Environmental Quality Act; Significance Determination Thresholds. Development Services Department. July.