



THE CITY OF SAN DIEGO M E M O R A N D U M

DATE: April 4, 2019

TO: Planning Commission

FROM: Myra Herrmann, Senior Environmental Planner, Planning Department

SUBJECT: Errata to the Final Program EIR for the Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments (Project No. 349988/SCH No. 2014041011)

Subsequent to distribution of the Final Program Environmental Impact Report (Final PEIR) for the above referenced project, minor edits have been made to the Final PEIR in the Executive Summary Table ES-1, Chapter 5.1 – Land Use, and Chapter 5.11 – Transportation/Circulation as further described below. The revision to the Mitigation Measure for MM-TRAF-1 shown below has also been revised and replaces Page 26 in the Monitoring and Report Program provided in Attachment 3 to the Planning Commission Staff Report.

FINAL PEIR EDITS

Executive Summary Table ES-1

Page ES-51 - Transportation/Circulation - Mitigation 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)~~ designed in accordance with the City's Street Design Manual, and shall include measures, determined by the City Engineer in accordance with the Street Design Manual, which may include:

- Appropriate signage
- ~~Review for Adequate site 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~~

Chapter 5.1 - Land Use
Pages 5.1-2 and 5.1-3:

~~ESL regulations [Municipal Code Section 143.0115(c)] require a development suitability analysis and land use plan to minimize impacts to ESL in accordance with the requirements of the Municipal Code and Land Development Manual when a Site Development Permit (SDP) is not requested concurrently with the processing of a project-specific land use plan. The proposed Plans would constitute the land use plan required by ESL Regulations. As specified in the Municipal Code Section 143.0115(c)(6), future projects within the Park subject to ESL Regulations would require a Process Four Site Development Permit and must be in conformance with the land use plan, in this case the MPU and NRMP, and must incorporate required mitigation. If not in conformance with the approved land use plan, the Site Development Permit would need to be in compliance with all ESL Regulations.~~

Subsequent projects implemented in accordance with the Plans would be subject to the provisions of the ESL Regulations and require a Site Development Permit (SDP) in accordance with Section 125.0502 of the LDC, as well as appropriate mitigation for direct impacts as further described in Chapter 5.5 Biological Resources.

Some of the pertinent policies contained in the ESL Regulations include the following:

- ~~• Impacts to sensitive biological resources would be avoided and/or minimized.~~
- ~~• Impacts to wetlands would be avoided and a wetland buffer would be maintained to protect the functions and values of the wetland.~~
- ~~• All clearing, grubbing, or grading (inside and outside the MHPA) would be restricted during the breeding season where development may impact the following species:~~
 - ~~○ Southwestern willow flycatcher (*Empidonax trillii extimus*): May 1–August 30~~
 - ~~○ Least tern (*Sternula antillarum browni*): April 1–September 15~~
 - ~~○ Cactus wren (*Campylorhynchus brunneicapillus sandiegensis*): February 15–August 15~~
 - ~~○ Least Bell's vireo (*Vireo bellii pusillus*): March 15–September 15~~
 - ~~○ Coastal California gnatcatcher (*Polioptila californica californica*): March 1–August 15 inside the MHPA only; no restrictions outside the MHPA~~

Chapter 11 – Transportation/Circulation Subsection 5.11.6 – Mitigation Framework
Pages 5.11-20 and 5.11-21
Mitigation Framework - 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)~~ designed in accordance with the City's Street Design Manual, and shall include measures, determined by the City Engineer in accordance with the Street Design Manual, which may include:

- Appropriate signage
- ~~Review for Adequate site 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~~

The revised pages are attached, and this Errata has been uploaded to the Planning Department's CEQA Policy and Review webpage (<https://www.sandiego.gov/planning/programs/ceqa>) associated with the Project.

These revisions do not affect the conclusions of the environmental analysis contained within the Final PEIR. Therefore, in accordance with Section 15088.5 of the California Environmental Quality Act (CEQA), recirculation of the EIR is not required.

This Errata to the FEIR is being provided to Planning Commission and will be included in the record for consideration with adoption of the Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments and Final PEIR certification process.



Myra Herrmann, Senior Environmental Planner

Attachments: Revised Page ES-51 - Executive Summary Table ES-1
Revised Pages 5.1-2, 5.1-3 - Chapter 5-1 Land Use
Revised Pages 5.11-20, 5.11-21 Chapter 5-11 - Transportation/Circulation
Revised Page 26 – Mitigation Monitoring and Reporting Program

cc: Project File

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	for a further traffic analysis. Based on these factors, it is not anticipated that subsequent projects implemented in accordance with the <u>MPU Plans</u> would result in a substantial increase in traffic in relation to the capacity of the existing circulation system. Impacts would be less than significant.		
Would implementation of the Plans and associated discretionary actions create alterations to present circulation movements in the area including effects on existing public access points?	Subsequent projects implemented in accordance with the <u>MPU Plans</u> 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. As detailed plans for these subsequent projects are not available at this time, it cannot be guaranteed that they would be designed in a manner that would avoid significant circulation and access impacts. Therefore, impacts would be significant (Impact TRAF-1).	<p>MM-TRAF-1: Subsequent projects implemented in accordance with the <u>MPU Plans</u> 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, and any other requirements pursuant to the discretion of the City's Engineer. Measures that shall be considered during subsequent project review to minimize potential impacts from pedestrian/bicyclist/vehicle conflicts and to enhance circulation include (but not necessarily limited to) <u>designed in accordance with the City's Street Design Manual, and shall include measures, determined by the City Engineer in accordance with the Street Design Manual, which may include:</u></p> <ul style="list-style-type: none"> • Appropriate signage • Review for aadequate sight distance, preparation of sight distance studies, and mitigation, where needed • Road striping • Crosswalks, where needed • Sidewalks and pathways for pedestrian access • Bollards 	Less than significant
Would implementation of the Plans and associated	As the recommended parking areas would improve accessibility to the Park by	None required.	Less than significant

dwelling unit homes at a very low density (minimum 10-acre lots for AR-1-1). However, a majority of parkland is publicly owned and intended for parkland preservation. Fortuna Mountain and East Elliott include areas of residential zoning including RS-1-1 within the Fortuna Mountain area and RS-1-8 within the East Elliott area. The portion of the West Sycamore area containing the Sycamore Landfill and a portion of the East Elliot area are zoned Industrial-Heavy (IH-2-1).

5.1.2.3 Municipal Code

The Municipal Code regulates land use and development throughout the City. It is intended to be the means by which the land use policies in the General Plan are implemented. The Municipal Code identifies the uses that are allowed on parcels within the City. Chapters 11 through 15 of the Municipal Code are referred to as the Land Development Code (LDC). These chapters contain the City's zoning, subdivision, building, and permitting regulations. The LDC is one of the tools used to implement the General Plan and the various community plans, which establish land use throughout the City. Relevant provisions of the LDC are detailed below.

a. Environmentally Sensitive Lands Regulations

Chapter 14, Article 3 of the LDC contains the Environmentally Sensitive Lands (ESL) Regulations, which are intended to “protect, preserve and where damaged restore the environmentally sensitive lands of the City and the viability of the species supported by those lands” (City of San Diego 2013a/2018a). These regulations encourage a sensitive form of development and serve to implement the MSCP Subarea Plan by prioritizing the preservation of biological resources within the Multi-Habitat Planning Area (MHPA).

ESL Regulations apply to all proposed development when environmentally sensitive lands are present. ESLs include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas (SFHA). Sensitive biological resources, steep hillsides, and SFHA are present within the Park. Sensitive biological resources, as defined by the ESL Regulations, include those lands within the MHPA and other lands outside of the MHPA that contain wetlands, vegetation communities classified as Tier I, II, IIIA, or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species. The San Diego River is considered a SFHA as shown on the Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Agency (FEMA) and is subject to the ESL Regulations specified in Municipal Code Section 143.0145. See also Section 5.8.1.3 for additional discussion of development regulations for SFHAs.

ESL regulations [Municipal Code Section 143.0115(c)] require a development suitability analysis and land use plan to minimize impacts to ESL in accordance with the requirements of the Municipal Code and Land Development Manual when a Site Development Permit (SDP) is not requested concurrently with the processing of a project-specific land use plan. The proposed Plans would constitute the land use plan required by ESL Regulations. As specified in the Municipal Code Section 143.0115(c)(6), future projects within the Park subject to ESL Regulations would require a Process Four Site Development Permit and must be in conformance with the land use plan, in this case the MPU and NRMP, and must incorporate required mitigation. If not in conformance with the approved land use plan, the Site Development Permit would need to be in compliance with all ESL Regulations.

result in a substantial increase in traffic. Other subsequent projects, such as the parking areas, would not result in a substantial increase in traffic in relation to the capacity of the existing circulation system because these parking areas would generally be traffic accommodating, rather than traffic generating. In addition, the estimated traffic volumes do not exceed established thresholds that generally trigger the need for a further traffic analysis. Based on these factors, it is not anticipated that subsequent projects implemented in accordance with the MPU-Plans would result in a substantial increase in traffic in relation to the capacity of the existing circulation system. Impacts would be less than significant.

Issue 2: Circulation and Access

Subsequent projects implemented in accordance with the MPU-Plans 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. As detailed plans for these subsequent projects are not available at this time, it cannot be guaranteed that they would be designed in a manner that would avoid significant circulation and access impacts. Therefore, impacts would be significant (**Impact TRAF-1**) and mitigation is required.

Issue 3: Parking

As the recommended parking areas would improve accessibility to the Park by providing additional parking areas, these recommendations would have an overall parking benefit. In addition, the parking areas would reduce current demand for parking on local residential streets. As a result, impacts related to parking would be less than significant.

Issue 4: Alternative Transportation

Implementation of the MPU-Plans would be consistent with existing policies supporting alternative transportation modes. Various MPU recommendations would support alternative modes of transportation and would not create a conflict with existing plans or policies. Therefore, impacts would be less than significant.

5.11.6 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 MPU-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, and any other requirements pursuant to the discretion of the City's Engineer. Measures that shall be considered during subsequent project review to minimize potential impacts from pedestrian/bicyclist/vehicle conflicts and to enhance~~

~~circulation, include (but not necessarily limited to)~~ designed in accordance with the City's Street Design Manual, and shall include measures, determined by the City Engineer in accordance with the Street Design Manual, which may include:

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

5.11.7 Significance after Mitigation

Although implementation of the Plans and associated discretionary actions would have the potential to result in significant impacts related to circulation and access, subsequent projects such as parking areas would be required to implement **MM-TRAF-1** prior to implementation. The Mitigation Framework requires site-specific environmental review, analysis of potential impacts, and implementation of measures to reduce significant impacts to below a level of significance.

Subsequent projects implemented in accordance with the Plans would be subject to the provisions of the ESL Regulations and require a Site Development Permit (SDP) in accordance with Section 125.0502 of the LDC, as well as appropriate mitigation for direct impacts as further described in Chapter 5.5 Biological Resources.

Some of the pertinent policies contained in the ESL Regulations include the following:

- ~~Impacts to sensitive biological resources would be avoided and/or minimized.~~
- ~~Impacts to wetlands would be avoided and a wetland buffer would be maintained to protect the functions and values of the wetland.~~
- ~~All clearing, grubbing, or grading (inside and outside the MHPA) would be restricted during the breeding season where development may impact the following species:~~
 - ~~Southwestern willow flycatcher (*Empidonax trillii extimus*): May 1–August 30~~
 - ~~Least tern (*Sternula antillarum browni*): April 1–September 15~~
 - ~~Cactus wren (*Campylorhynchus brunneicapillus sandiegensis*): February 15–August 15~~
 - ~~Least Bell's vireo (*Vireo bellii pusillus*): March 15–September 15~~
 - ~~Coastal California gnatcatcher (*Poliophtila californica californica*): March 1–August 15 inside the MHPA only; no restrictions outside the MHPA~~

b. Storm Water Runoff and Drainage Regulations

The Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) regulate the development of, and impacts on, drainage facilities, to limit water quality impacts from development, to minimize hazards due to flooding while minimizing the need for construction of flood control facilities, and to minimize impacts on environmentally sensitive lands.

c. Historical Resources Regulations

The purpose of the Historical Resources Regulations (Chapter 14, Article 3, and Division 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources and tribal cultural resources in accordance with Public Resources Code Sections 21080.3.1 and 21080.3.2 (Assembly Bill 52). The Historical Resources Regulations require that development affecting designated historical resources or historical districts would provide full mitigation for the impact to the resource as a condition of approval. If development cannot to the maximum extent feasible comply with the development regulations for historical resources, then a SDP or Neighborhood Development Permit (NDP) may be required.

The Historical Resources Regulations require that designated historical resources and traditional cultural properties be preserved unless deviation findings can be made by the decision-maker as

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)~~ designed in accordance with the City's Street Design Manual, and shall include measures, determined by the City Engineer in accordance with the Street Design Manual, which may include:

- 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).