THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 670391
SCH No. TBD

SUBJECT: El Camino Memorial Park Secret Canyon Project: An amendment to CONDITIONAL USE PERMIT (CUP; CUP No. 94-0312) for a 5.3-acre expansion within the 212-acre El Camino Memorial Park located at 5600 Carroll Canyon Road (Assessor's Parcel Number [APN] 341-040-36-00) in the Mira Mesa community within Council District 6. The proposed project involves the expansion of the existing El Camino Memorial Park to provide 4,500 new burial sites, a bridge, an access road, stormwater management features, and main entrance sidewalk and curb ramp improvements along the project's frontage on Carroll Canyon Road. The project is proposed in two phases with Phase 1 consisting of the bridge and roadway extension as well as grading of 1,000 burial areas, and Phase 2 consisting of fine grading for 3,500 burial sites and sod/irrigation placement. The project site is designated Cemetery and Open Space in the Mira Mesa Community Plan (adopted by City Council on December 5, 2022) and is zoned AR-1-1 (Agricultural-Residential Zone). The project site is also within the Airport Influence Area Review Area 1 and the Federal Aviation Administration Part 77 Height Notification Area for Marine Corps Air Station Miramar.

LEGAL DESCRIPTION: A portion of Lot 1 of El Camino Memorial Park, in the City of San Diego, County of San Diego, State of California, according to Map thereof No. 4719, filed in the Office of the County Recorder of San Diego County, February 20, 1961.

APPLICANT: Robert Dowson

I. PROJECT DESCRIPTION

See attached Initial Study.

II. ENVIRONMENTAL SETTING

See attached Initial Study.

III. DETERMINATION

The City of San Diego conducted an Initial Study (IS) which determined that the proposed project could have a significant environmental effect with regard to **Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Land Use and Planning, and Tribal Cultural Resources**. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration (MND). The project as revised now avoids or

mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS

Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice to Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction-related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD) (plans, specification, details, etc.) to ensure the Mitigation Monitoring and Reporting Program (MMRP) requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/developmentservices/industry/information/standtemp.shtml.

4. The TITLE INDEX SHEET must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. SURETY AND COST RECOVERY. The DSD Director or City Manager may require appropriate surety instruments or bonds from private Permit. Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

Post Plan Check (After permit issuance/Prior to start of construction)

6. PRE-CONSTRUCTION MEETING is required ten (10) working days prior to beginning any work on this project. The Permit Holder/Owner is responsible to arrange and perform this meeting by contacting the City Resident Engineer (RE) of the Field Engineering Division and City staff from Mitigation Monitoring Coordination (MMC). Attendees must also include the Permit Holder's Representative(s), Job Site Superintendent, and the following consultants:

    - Qualified biologist
    - Qualified archaeologist and Native American monitor

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

CONTACT INFORMATION:

a. The primary point of contact is the RE at the Field Engineering Division – 858-627-3200.
b. For clarification of environmental requirements, applicant is also required to call RE and MMC at 858-627-3360.

7. MMRP COMPLIANCE. This Project, Project (PRJ) Number 670391 and/or Environmental Document Number 670391, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

8. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency: ***Streambed Alteration Agreement, Operation of Law Letter, or written response stating a Streambed Alteration Agreement "is not required" is necessary from the California Department of Fish and Wildlife. An Incidental Take Permit for impacts to Crotch's bumble bee is also required from the California Department of Fish and Wildlife.***

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

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

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

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST

Issue Area	Document Submittal	Associated Inspection/ Approvals/Notes
General	Consultant qualification letters	Prior to preconstruction meeting
General	Consultant construction monitoring exhibits	Prior to preconstruction meeting
Biological Resources	Streambed Alteration Agreement, Operation of Law Letter, or correspondence from CDFW stating a Streambed Alteration Agreement is not necessary	Prior to permit issuance
Biological Resources	Incidental Take Permit	Prior to permit issuance
Biological Resources (construction noise)	Acoustical analysis (if construction commences during the avian breeding season and adjacent habitat is occupied by gnatcatcher)	Prior to construction
Biological Resources	Monitoring reports	Following construction monitoring
Cultural Resources/Tribal Cultural Resources	Monitoring reports	Following construction monitoring
Hazards and Hazardous Materials	Soil Testing Results and, if applicable, Soil Management or Health and Safety Plan	Prior to construction

B. SPECIFIC MMRP ISSUE AREA CONDITIONS REQUIREMENTS

BIO-1 Biological Resource Protection During Construction: Prior to the issuance of any grading or landscaping permit, the City Manager (or appointed designee) shall verify that the following project requirements are shown on the construction plans:

I. Prior to Construction

A. Biologist Verification – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. Preconstruction Meeting – The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting

including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. **Biological Documents –** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. **Biological Construction Mitigation/Monitoring Exhibit –** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service [USFWS] protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Avian Protection Requirements** – To avoid any direct impacts to any species identified as a listed, candidate, sensitive, or special status species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species, including white-tailed kite, southern California rufus-crowned sparrow, Bell's sage sparrow, coastal California gnatcatcher, and Cooper's hawk (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance.

The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The

City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. **Resource Delineation –** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

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

II. During Construction

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

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

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

BIO-2 Crotch's Bumble Bee Protection Requirement: Due to the presence of the candidate state endangered species Crotch's bumble bee (*Bombus crotchii*) and suitable habitat for the species within the project site, the following measures shall be implemented to reduce potential impacts to this species. The measures below shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered or threatened species at the time of project construction. If Crotch's bumble bee is delisted, then impacts to the species would not be significant, and the measures below shall not be required.

Construction Timing: Before the issuance of any grading or landscaping permit, the City Manager (or appointed designee) shall verify that the following project requirements are shown on the construction plans. To minimize direct and indirect impacts to Crotch's bumble bee, removal of vegetation within suitable habitat shall be conducted during the non-flight season (November 1 through January 31), so that when the bees start flying, they will move out of the cleared area. Vegetation removal should be conducted in a manner to minimize soil disturbance, which could affect any Crotch's bumble bee nests, as well as to leave the roots of vegetation in place to help with ground stability until grading starts. Grading shall be conducted during the next flight season (February 1 through October 31) while the adult bees are mobile. Any deviation from this schedule would require CDFW approval and could require additional surveys. Suitable habitat within the project site consists of Diegan coastal sage scrub/*Artemisia californica-Salvia mellifera* Association (including disturbed), southern mixed chaparral/*Xylococcus bicolor-Quercus (berberidifolia)* Association, and coast live oak woodland/*Quercus agrifolia* Alliance.

Incidental Take Permit: Before the issuance of a grading permit, the project applicant shall conduct CESA-required consultation with CDFW regarding the project's effects to Crotch's bumble bee occupied habitat has occurred, and, if CDFW expects take of Crotch's bumble bee, that CDFW has authorized such take through an incidental take permit (pursuant to Fish & Game Code, § 2080 et seq), as applicable. The project applicant shall comply with the measures detailed in the take authorization issued by CDFW, which shall supersede any inconsistent measures provided in this report. The project applicant shall provide a copy of a fully executed take authorization to the City before implementing project ground-disturbing activities and vegetation removal.

Compensatory Mitigation: Permanent direct impacts to occupied Crotch's bumble bee habitat shall be offset through compensatory mitigation by preservation of Tier II habitat as described in mitigation measure BIO-3. However, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures and mitigation ratios provided in this report.

BIO-3 Compensatory Mitigation: As mitigation for impacts to less than 0.1 acre (0.03 acre) of Tier I habitat in Phase 1 and 5.2 acres of Tier II habitat (2.5 acres in Phase 1 and 2.7 acres in Phase 2), the project applicant shall preserve 0.03 acre of Tier I habitat and 5.2 acres of Tier II habitat. Compensatory mitigation for all habitat impacts shall be provided prior to the start of construction for Phase 1. A total of 0.19 acre of coast live oak woodland, 1.2 acres of southern mixed chaparral, and 0.1 acre of non-native grassland preserved in excess of mitigation requirements is reserved for compensatory habitat mitigation for future El Camino Memorial Park projects. The proposed mitigation area includes these acreages.

Mitigation for impacts to Tier I habitat would occur in Tier I within the MHPA. Mitigation ratios assume all impacts are outside the MHPA and all mitigation is inside the MHPA (after boundary line adjustment).

BIO-4 Notification of Lake or Streambed Alteration: Prior to issuance of permits by the City, the project applicant will submit Notification of Lake or Streambed Alteration to CDFW for impacts to 0.03 acre of CDFW jurisdictional riparian habitat pursuant to Section 1600 et seq. of the California Fish and Game Code and obtain either a Streambed Alteration Agreement, Operation of Law Letter, or written response from CDFW that a Streambed Alteration Agreement is not required. Proposed mitigation could consist of on-site preservation and/or enhancement of CDFW-jurisdictional riparian habitat at a 2:1 ratio or other on-site or off-site mitigation to the satisfaction of CDFW. The final details of mitigation for jurisdictional impacts will be determined in consultation with CDFW as part of the Section 1600 permitting process.

CUL-1 Archaeological and Tribal Cultural Resources Monitoring:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/ Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Submit Letters of Qualification to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC shall provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant shall obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/4-mile radius) has been completed. Verification includes but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. Principal Investigator Shall Attend Preconstruction Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Preconstruction Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

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

2. Identify Areas to be Monitored

    a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

    b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

    b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.

    a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

    b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

    c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains;

and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.

2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains are determined to be Native American

1. The Medical Examiner will notify the NAHC within 24 hours. By law, ONLY the Medical Examiner can make this call.

2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.

3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:

a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR the landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN in order to protect these sites, the landowner shall do one or more of the following:

(1) Record the site with the NAHC;

(2) Record an open space or conservation easement; or

(3) Record a document with the County.

D. If Human Remains Are NOT Native American

1. The PI shall contact the medical examiner and notify them of the historic-era context of the burial.

2. The medical examiner will determine the appropriate course of action with the PI and city staff (PRC 5097.98).

3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, the EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

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

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction meeting.

2. The following procedures shall be followed.

a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8:00 a.m. of the next business day.

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

and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

d. The PI shall immediately contact MMC, or by 8:00 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction:

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

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

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

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation.

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to

the South Coastal Information Center with the Final Monitoring Report.

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

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

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

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

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

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

3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

HAZ-1 **Soil Testing**: Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/ Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the applicant shall provide, in letter form, to the Mitigation Monitoring and Coordination Section (MMC) the results of soils testing for the area previously used as an orchard. If initial testing of this area does not reveal contaminated soils (containing contaminants exceeding the screening levels in CCR Title 22, Division 4.5), the results shall be provided to the MMC and no further action would be required. If contaminated soils are identified during initial testing, the applicant shall provide verification in letter form to the MMC that the County of San Diego, Department of Environmental Health and Quality has reviewed and approved the proposed Soil Management Plan and, if required based on the level of contamination identified, the proposed Health and Safety Work Plan for the treatment and disposal of hazardous materials or contaminated soils that may be encountered within the project site. If required, the Soil Management Plan and Health and Safety Plan shall be prepared in accordance with requirements of the County of San Diego and shall comply with other applicable federal, state, and local requirements related to hazardous materials.

VI. PUBLIC REVIEW DISTRIBUTION

Draft copies or notice of this Mitigated Negative Declaration have been distributed to:

Federal Government
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Fish & Wildlife Service

State of California
State Clearinghouse
California Department of Fish and Wildlife

City of San Diego
Mayor's Office (91)
Councilmember Cate, District 6 (MS 10A)
Development Services Department
Jeff Szymanski, EAS
Kyle Goosens, LDR Planning Review
Hoss Florezabihi, LDR Engineering
Kreg Mills, Geology –
Vanessa Kohakura, Landscaping
Martha Blake, DPM
Mary Rose Santos, Transportation Development
Gary Nguyen, Public Utilities Department

Planning Department
    Scott Mercer, Public Facilities Planning
    Alexander Frost, Long Range Planning
    Dan Monroe, MSCP
Environmental Services Department
    Lisa Wood
Fire and Life Safety Services (79)
Library Department - Government Documents (81)
Central Library (81A)
Serra Mesa Library
City Attorney (93C)

Other Organizations, Groups, and Interested Individuals
Mira Mesa Community Planning
Sierra Club (165)
San Diego Audubon Society (167)
California Native Plant Society (170)
Engendered Habitat League (182a)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
San Diego Natural History Museum (213)
Save Our Heritage Organization (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown, Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution – Public Notice Map Only (225A-S)

VII. RESULTS OF PUBLIC REVIEW

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

( ) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.

Jeff Szymanski, Senior Planner
Development Services Department

July 25, 2025
Date of Draft Report

Date of Final Report

Attachments: Initial Study Checklist
Figure 1 – Regional Location
Figure 2 – Aerial Photograph
Figure 3 – Proposed Project Impacts
Figure 4 – Proposed Mitigation Area

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INITIAL STUDY CHECKLIST

1. Project title/Project number: El Camino Memorial Park Secret Canyon Project / 670391

2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California, 92101

3. Contact person and phone number: Jeff Szymanski / (619) 235-5200

4. Project location: 5600 Carroll Canyon Road, San Diego, California 92121

5. Project Applicant/Sponsor's name and address: Robert Dowson, 5600 Carroll Canyon Road, San Diego CA 92121

6. Community Plan designation: Cemetery and Open Space

7. Zoning: AR-1-1 (Agricultural-Residential Zone)

8. Description of project (describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation):

   The project proposes expansion of the existing El Camino Memorial Cemetery, located at 5600 Carroll Canyon Road in the City of San Diego (City), California into a 5.3-acre undeveloped area in the northeastern portion of the existing 212-acre cemetery property (see Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*). The expansion area would provide approximately 4,500 new burial sites.

   Access to the expanded area would be provided via extension of an existing 36-foot-wide internal roadway that currently terminates as a cul-de-sac. The proposed roadway would extend from the existing cul-de-sac an additional approximately 650 feet to the northeast and north and would include a clear-span bridge crossing the streambed that bisects the site in a north-south direction. The roadway extension would be 28 feet wide from curb to curb; the bridge would be 25 feet wide and span approximately 75 feet between two anchor block retaining walls. The 25-foot bridge design was based on structural design elements (i.e., member sizes, spans, and widths) and provides fire access roadways of not less than 20 feet of unobstructed width. The proposed roadway segment would terminate in a 60-foot radius cul-de-sac with two adjacent 22-foot by 20-foot concrete pads that allow for turnaround of emergency vehicles. Parking along the new roadway would only be allowed on the eastern side, where rolled curbs would be constructed. Six-inch combined curb and gutters would be provided along the western side of the roadway north of the bridge.

   At the main entrance to the El Camino Memorial Park property along Carroll Canyon Road, the project would extend the existing sidewalk to the cemetery entrance drive and construct associated curb ramps to Americans with Disabilities Act standards.

   The expansion area would be constructed in two phases (see Figure 3, *Proposed Project Impacts*). Phase 1 would consist of the construction of the bridge and roadway extension and grading of 1,000 burial areas on approximately 2.6 acres of the project site. Grading is anticipated to result in 7,340 cubic yards (cy) of cut, 6,395 cy of fill, and 305 cy of export based on on-site shrinkage.

Slopes would be cut to a maximum depth of 5.5 feet and filled up to 22 feet in height. Construction of Phase 1 is anticipated to last between three and nine months. During the construction of Phase 1, natural vegetation within the Phase 2 area would be cleared and a hydroseed mix would be installed. In addition, a boundary cable fence may be installed to establish the developable edge associated with both project phases. Phase 2 construction would begin when the Phase 1 area begins running out of burial spaces, which is anticipated to occur three to five years after its completion. Phase 2 construction would last one to two months and would consist of fine grading and sod/irrigation placement on the remaining 2.7 acres of the site, resulting in the creation of approximately 3,500 burial sites.

The cemetery expansion is proposed to expand the overall burial capacity at El Camino Memorial Park but is not anticipated to result in an increased rate of burials. Rather, existing areas of the property have been filled, and new land is required to continue burials at the current rate. Visitations to older areas of the cemetery are generally expected to decrease over time while visitations move towards the newer areas.

Runoff from the eastern side of the project site would be collected and transported by an earthen swale into a rip rap energy dissipation structure prior to discharge upslope of the existing tributary. Curbs along the edge of the access road would direct runoff from the roadway through a storm drain into a biofiltration basin, which would outlet to a second rip rap energy dissipation structure near the southern end of the site.

The proposed project would require an amendment to the Conditional Use Permit (CUP) that allows the existing cemetery use (CUP No. 94-0312). A 0.69-acre portion of the project area proposes development within the Multi-Habitat Planning Area (MHPA) and would require a boundary line adjustment. Therefore, the project proposes a 0.82-acre addition to the MHPA area west of the Phase 1 expansion area (Figure 3).

9. Surrounding land uses and setting:

The 5.3-acre project site consists of a portion of Assessor's Parcel Number 341-040-36-00, located at 5600 Carroll Canyon Road in the Carroll Canyon subarea of the Mira Mesa Community Planning area. The site is an undeveloped portion of the El Camino Memorial Park cemetery property, to the east of an unnamed tributary to Carroll Canyon Creek. The project site includes the 5.3-acre proposed cemetery expansion area as well as portions of the El Camino Memorial Park property that are relevant to the project because of the proposed MHPA boundary line adjustment, or their proposed use as mitigation for the project.

Adjacent land uses include industrial buildings and open space to the north and east and the existing Memorial Park to the south and west. Carroll Canyon Road and Fenton Road border the Memorial Park property to the south and separate the Memorial Park from additional open space areas and industrial buildings south of these roadways. The majority of open space areas within and surrounding the project site are part of the City's MHPA. Topographically, the site is generally sloped from east to west, with the highest elevations occurring at the eastern edge of the site at approximately 285 feet above mean sea level and the lowest elevations occurring near the unnamed tributary at roughly 195 feet above mean sea level.

The project site has Cemetery and Open Space land use designations in the Mira Mesa Community Plan and is zoned AR-1-1 (Agricultural-Residential Zone). The project site is within the Airport Influence Area (AIA) Review Area 1 and the Federal Aviation Administration (FAA) Part 77 Height Notification Area for Marine Corps Air Station (MCAS) Miramar (San Diego County Airport Land Use Commission 2011).

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The City is the project Lead Agency under CEQA. In its role as Lead Agency, the City is responsible for ensuring the adequacy of this IS/MND. Prior to issuance of City permits, a Streambed Alteration Agreement or written response from the California Department of Fish and Wildlife (CDFW) is required for impacts proposed to jurisdictional habitat. An Incidental Take Permit for impacts to Crotch's bumble bee will be required if this species remains as a candidate endangered species or is listed as an endangered species.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Assembly Bill 52, the City of San Diego sent notifications via email to the Native American Tribes traditionally and culturally affiliated with the project area. The Notifications were distributed to the Iipay Nation of Santa Ysabel, the Jamul Indian Village and the San Pasqual Band of Mission Indians for consultation on September 14, 2023, for 30 days concluding on October 14, 2023. No letters requesting consultation were received within the 30-day time period. Please see Section XVIII of the Initial Study for more detail.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION

(To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D).* In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question;

    b. Where applicable, the City of San Diego's CEQA Significance Determination Thresholds (Thresholds) (City 2022) are identified and used to evaluate project impacts; and

    c. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS				
– Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Pursuant to the City of San Diego CEQA Significance Determination Thresholds (Thresholds; City 2022), projects that block public views from designated open space areas, roads, or scenic vistas to significant visual landmarks may result in significant impacts. The Thresholds also note that grading activities resulting in landform alterations of more than 2,000 cy per acre, or less in highly scenic or environmentally sensitive areas, may also result in substantial adverse impacts to scenic vistas under certain conditions.

A scenic vista is generally defined as a public viewpoint that provides expansive or notable views of a highly valued landscape and are typically identified in planning documents, such as a community plan, but can also include locally known areas or locations where high-quality public views are available. The project site is within the Mira Mesa Community Plan area, and the Mira Mesa Community Plan does not identify specific viewpoints but identifies open space and canyon viewsheds and scenic overlooks at public parks adjacent to canyons within the Community Plan area as resources of scenic quality. The project would occur within and adjacent to a canyon with an open space area consisting of native vegetation, which would be considered a scenic resource. However, the project does not propose elements with substantial height that would block public views of the canyon viewshed from nearby public vantagepoints.

Grading during Phase 1 of the project would result in approximately 7,340 cy of cut, 6,395 cy of fill on the 2.6-acre portion of the site, which exceeds 2,000 cy per acre. However, the City's Thresholds also provide exceptions if grading plans demonstrate naturalized slopes or if the grading permits installation of design features to decrease overall grading requirements. The maximum finished grade change would be 22 feet and would occur around the proposed roadway extension, which includes a bridge to reduce grading requirements and avoid impacts to native vegetation. Given the surrounding tributary and varied slopes throughout the area, the grade change associated with the new slope would not appear unnatural. The tributary area and surrounding slopes are also vegetated with shrubs and trees of varying heights, which buffers views of slopes down to the tributary and provides the appearance of greater slope variations. The project would integrate visually and topographically with surrounding development, including both the existing Memorial Park development and open space areas. The proposed grading activity would not result in unnatural slopes or landforms that compromise scenic views within the adjacent canyon and open space area.

During construction, equipment would be located within the project site; however, this equipment would be located near open space temporarily and would not result in a permanent alteration of scenic vistas. Views of the canyon and open space would remain available with implementation of the project. Accordingly, the proposed project would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

As noted above. Pursuant to the City's Thresholds, projects that block public views from designated open space areas, roads, or scenic vistas to significant visual landmarks may result in significant impacts. State scenic highways are considered scenic vistas due to the visual attributes and resources that comprise their designation.

There are no designated state scenic highways in the Mira Mesa Community Plan area where the project site is located. Therefore, the project would not be within a state scenic highway viewshed. In addition, as described in I(a), the project would integrate with the surrounding visual landscape and would not result in new structures of substantial height. There are no structures or historic buildings, rock outcroppings, or mature tree stands within the project site. Therefore, the project would not substantially damage or block views of scenic resources, including those along a state scenic highway. No impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

According to the City's Thresholds projects that severely contrast with the surrounding neighborhood character may result in a significant impact. To meet this significance threshold the project must exceed allowable height or bulk regulations, use a contrasting architectural theme, result in the loss or degradation of a designated community landmark, be located in a highly visible area, and/or open a new area for development.

As the project does not propose buildings, it would not exceed height or bulk regulations and would not contrast with any established architectural themes in the vicinity. In addition, the project site is undeveloped and implementation of the project would not result in the loss of any established community landmark. Given the project's location in a canyon, it can be considered to be highly visible; however, as described in I(a), it would not contrast with surrounding development or topography. The project also does not consist of infrastructure or other elements that would open a new area for future development, thereby resulting in a cumulative impact to visual character. Therefore, the project would not substantially degrade the visual character or quality of the site or the surrounding area and impacts would be less than significant.

d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

According to the City's Thresholds, a project may have a significant light and glare impact if it would be moderate to large in scale and include more than 50 percent of one elevation of a material with a

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

light reflectivity greater than 30 percent in a location adjacent to a major public roadway. A project may also have a significant impact if it would shed substantial light onto adjacent, light-sensitive land uses or would emit a substantial amount of ambient light into the nighttime sky.

The project does not propose buildings and, therefore, would not result in building elevations with substantial light reflectivity. No substantial sources of lighting would be generated during construction, as construction activities would occur during daylight hours and would not require the use of light. The project also does not propose the installation of new lighting for operational purposes, as the property closes at dark. The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. No impact would occur.

II. AGRICULTURAL AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

– Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than prime farmland, which has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is considered to be Farmland of Local Importance. The Farmland Mapping and Monitoring Program (FMMP) maintained by the California Department of Conservation (DOC) is the responsible state agency for overseeing the farmland classification. In addition, the City's Thresholds state that in relation to converting designated farmland, a determination of substantial amount cannot be based on any one numerical criterion (i.e., one acre), but rather on the economic viability of the area proposed to be converted. Another factor to be considered is the location of the area proposed for conversion.

According to the DOC's California Important Farmland Finder, the project site is classified as Urban and Built-Up Land (land that is developed with urban uses of less than 40 acres and surrounded by developed uses) and Other Land (land not included in any other category). No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occurs within or immediately surrounding the project site. Therefore, the project would not result in the conversion of farmland and no impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use; in return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Williamson Act is only applicable to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland, or at least 40 acres of land not designated as Prime Farmland. The Williamson Act is designed to prevent the premature and unnecessary conversion of open space lands and agricultural areas to urban uses.

The project site is zoned as AR-1-1, which is an agricultural-residential zone for the purpose of accommodating a wide range of agricultural uses and low-density residences. This zone is applied to lands that are not appropriate for more intense zoning. Cemeteries are a conditionally allowable use of lands zoned AR-1-1 and an amendment to the existing CUP would be processed as part of the project. As such, the project would not conflict with the site's existing zoning for agricultural use. Additionally, the project site is not encumbered by a Williamson Act Contract and would not affect any properties affected by a Williamson Act Contract, as there are none within the project vicinity. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒

PRC Section 12220(g) defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. According to PRC Section 4526, "timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Based on these definitions, no forest land or timberland occurs within the project site. Moreover, there is no land zoned as forest land or timberland that exists within the project site or within its vicinity. Therefore, the project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

As stated in III(c), there is no forest land present on the site or in the project vicinity. The site has not been historically and is not currently used or planned to be used for forest land. As such, implementation of the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Refer to III(a) through III(d), above. No existing agricultural or forest land uses are located in the vicinity of the project site. The project site does not propose a change to the current zone of AR-1-1 and would not conflict with the allowable land uses in this zone. Therefore, the project would not involve changes in the existing environment that could result in the conversion of farmland or forest land into non-agricultural or non-forest use. No impacts would occur.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

– Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

According to the City's Thresholds, a project may have a significant air quality impact if it could conflict with or obstruct implementation of the applicable air quality plan.

The project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego County Air Pollution Control District (SDAPCD) and California Air Resources Board (CARB). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the Ambient Air Quality Standards (AAQS) in the SDAB. The regional air quality plan for San Diego County is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan; SDAPCD 2020). The Attainment Plan outlines the SDAPCD's plans and control measures designed to attain the state air quality standards, including applicable portions of the California State Implementation Plan (SIP). Assumptions for growth in the Attainment Plan are derived from local land use plans; therefore, projects that are consistent with their local General Plan would not typically conflict with the Attainment Plan

The project is consistent with the land use proposed in the City General Plan and Mira Mesa Community Plan. In addition, the project would not result in an increase in population or an increase in permanent employment opportunities in the City. Long-term operation of the project would not result in a substantial increase in vehicle trips or other activities that generate pollutant emissions. Therefore, the project would be consistent with the anticipated land use in the City General Plan and the Mira Mesa Community Plan and would be consistent with the assumptions used to develop the Attainment Plan. As such, the project would not conflict with or obstruct implementation of the Attainment Plan or applicable portions of the SIP. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

The City's Thresholds state that a significant impact may occur if a project violates any air quality standard or contributes substantially to an existing or projected air quality violation. The project region (SDAB) is currently a federal nonattainment area for ozone (8-hour standard) and a state nonattainment area for ozone (1-hour and 8-hour standards), particulate matter of 2.5 microns or less in diameter ($PM_{2.5}$) and particulate matter of 10 microns or less in diameter (PM_{10}). Ozone is not emitted directly but is generated as a result of reactions between precursors (nitrogen oxides [NO_X] and volatile organic compounds [VOC]).

Short-Term (Construction) Emissions

Implementation of the project would primarily generate criteria pollutants and ozone precursors in the short-term during construction. Project construction activities would result in emissions of fugitive dust (i.e., PM_{10} and $PM_{2.5}$) from site grading activities, roadway construction activities, and vehicle trips associated with workers commuting to and from the site and trucks hauling materials. Variables that factor into the total construction emissions potentially generated include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of material to be transported on- or off site.

Fugitive dust emissions are generally associated with land clearing and grading operations. Ozone precursors (NO_X and VOCs) occur during construction as a result of fuel combustion in equipment. Construction activities would be subject to the requirements established in SDAPCD Regulation IV, Rules 52, 54, and 55, which limit the allowable emissions of particulate matter and require dust control measures for roadway dust beyond the project site. The project would include standard measures as required by the City grading permit to minimize fugitive dust and air pollutant emissions during the temporary construction period. Therefore, project construction would not result in a cumulatively considerable net increase of ozone precursors, $PM_{2.5}$, or PM_{10}, pollutants for which the SDAB is in nonattainment. Impacts related to short-term emissions would be less than significant.

Long-Term (Operational) Emissions

Long-term operation of the project would result in emissions of criteria pollutants and ozone precursors from landscape equipment, maintenance, and vehicle trips. The rate of burials would not increase with implementation of the proposed project. The increase of less than five acres requiring landscaping and maintenance would not result in a net increase of criteria pollutant emissions that would result in violation of an air quality standard.

As discussed further in XVII(a), the project would not result in a substantial increase of vehicle trips. Therefore, mobile sources would not result in project emission generating substantial quantities of criteria pollutants, including $PM_{2.5}$, PM_{10} and ozone precursors.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project's operational activities would not change substantially from existing conditions and operational emissions resulting from implementation of the project would not violate any air quality standard or contribute substantially to an air quality violation. Impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

The City's Thresholds state that a sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than the population at large. Examples of land uses likely to be associated with sensitive receptors include long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.

Development surrounding the project site primarily consists of industrial facilities and office buildings. The nearest sensitive receptors are located at a hotel approximately 2,500 feet west of the project site. At this distance, and given compliance with the SDAPCD rules described in III(b), emissions from the project site would not result in substantial quantities of pollutants near sensitive receptors. The project also would not generate substantial vehicle trips such that carbon monoxide hotspots would develop off-site due to project implementation. The project would not result in exposure of sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The City's Thresholds state that the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at the receptors.

Emissions from construction equipment, such as diesel exhaust, and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. By the time these emissions reach any sensitive receptor sites (approximately 0.5-mile away), they would be diluted below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials.

According to the City's Thresholds, land uses associated with odor complaints typically include agricultural uses and heavy industrial uses. The project, involving expansion of an existing cemetery land use is not anticipated to be associated with odor complaints. Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City's Municipal Code solid waste regulations (San Diego Municipal Code Chapter 14, Article 2, Division 8), thereby precluding significant odor impacts associated with solid waste. In addition, the project would be required to comply with Municipal Code Section 142.0710, which regulates air contaminants in the City.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Implementation of the project would not substantially change emissions of odors compared to existing operations on the project site. Temporary construction activities may produce odors from construction equipment exhaust and/or the application of asphalt; however, these emissions would be temporary and intermittent in nature and would be most perceptible within the localized area of the source. These types of odor emissions generally occur at magnitudes that would not adversely affect a substantial number of people. Thus, the project would not result in odors or other emissions adversely affecting a substantial number of people and impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

– Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

The City's Thresholds state that significance of impacts to biological resources are assessed by City staff through the CEQA review process and through review of the project's consistency with the Environmentally Sensitive Lands (ESL) Regulations, the Biology Guidelines (2018) and with the City's Multiple Species Conservation Program (MSCP) Subarea Plan (1997). Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. The City has established a two-step process that: (1) provides guidance to determine the extent of biological resources and values present on the site; and (2) based on the findings of Step 1, if significant biological resources are present, then a survey to determine the nature and extent of the biological resources on the site is warranted.

HELIX prepared a Biological Technical Report (BTR; 2024) for the proposed project, which included a literature review, general biological surveys, rare plant surveys, coastal California gnatcatcher (*Polioptila californica californica*) protocol surveys, focused Crotch's bumble bee (*Bombus crotchii*) surveys, and a jurisdictional delineation. The BTR study area encompassed approximately 23 acres of undeveloped area, including the project site and adjacent portions of the El Camino Memorial Park property to the south, MHPA lands to the west, and potential habitat mitigation areas west of the project site. Several special status plant and animal species were observed in the study area during biological surveys. Potential project effects on special status plant and animal species are described below.

The project site is within the boundary of the City's MSCP Subarea Plan, and a small portion of the impact area is within the MHPA. The City's permit to "take" covered species under the MSCP is based on the concept that 90 percent of lands within the MHPA will be preserved. To avoid significant encroachment into the MHPA, the project includes a boundary line adjustment to remove lands within the proposed impact footprint from the MHPA, in exchange for lands outside of the impact footprint. The proposed boundary line adjustment includes an addition to the north and west of the impact area and a subtraction within the project footprint at the southwestern tip of Phase 1 and within Phase 2 to the east of the Phase 1 project area (Figure 3). The MHPA addition area was

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

analyzed in the BTR and determined to be habitat that is equivalent or higher biological value to what would be removed from the MHPA.

Special Status Plant Species

Five special status plant species were observed within the BTR study area: 25 individuals of San Diego sagewort (*Artemisia palmeri*; California Rare Plant Rank [CRPR] 4.2), 2 individuals of summer holly (*Comarostaphylis diversifolia* ssp. *Diversifolia*; CRPR 1B.2), 202 individuals of San Diego barrel cactus (*Ferocactus viridescens*; CRPR 2B.1), 699 individuals of decumbent goldenbush (*Isocoma menziesii* spp. *decumbens*; CRPR 1B.2) within the rare plant survey area, and an unknown number of individuals of ashy spike-moss (*Selaginella cinerascens*; CRPR 4.1). Of these species, San Diego sagewort, San Diego barrel cactus, decumbent goldenbush, and ashy spike-moss occur within the project footprint. One other special status plant species (Robinson's pepper-grass [*Lepidium virginicum* var. *robinsonii*]) has a high potential to occur on-site, given that dead pepper-grass observed on-site could not be identified to its species.

The project is anticipated to impact 216 decumbent goldenbush (31 percent of those observed), 35 San Diego barrel cactus (17 percent of those observed), patches of ashy spike-moss, and two San Diego sagewort (8 percent of those observed) The majority of special status plant individuals present would be avoided by the project and there are documented occurrences of these species within nearby preserved lands. In addition, none of the special status plant species are listed as endangered or threatened at the federal or state level. Therefore, the BTR concludes that activities within the project site would not have a substantial adverse impact on these species and impacts are considered less than significant.

Special Status Animal Species

Three special status species were observed within the BTR study area during biological surveys: white-tailed kite (*Elanus leucurus*), coastal California gnatcatcher, and mule deer (*Odocoileus hemionus*). Of these species, coastal California gnatcatcher and mule deer were observed within the project footprint. The San Diego desert woodrat (*Neotoma lepida intermedia*) is presumed present, given observations of stick nests. Crotch's bumble bee was also observed on the project site during focused surveys for this species.

White-tailed kite, a fully protected but unlisted species, was observed flying over the study area, outside of the project footprint. The project proposes to impact less than 0.1 acre of coast live oak woodland that could potentially be used for nesting by this species, though no active or former nests were observed during biological surveys. The proposed impacts to coast live oak woodland would not have a substantial adverse impact on white-tailed kite due to the small acreage of habitat present and impacts to the habitat are considered less than significant. Significant direct impacts to nesting white-tailed kites during the nesting season could occur if individuals are found to be nesting on-site or within 500 feet of the site. Mitigation measure BIO-1 requires impacts to white-tailed kite habitat to occur outside of the breeding season or after a preconstruction survey has been completed and appropriate avoidance measures are implemented. With implementation of mitigation measure BIO-1, impacts to white-tailed kites would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The federally threatened coastal California gnatcatcher was observed in the project area during protocol surveys conducted in 2021; therefore, suitable coastal California gnatcatcher habitat within the project area is considered occupied by coastal California gnatcatcher. Specifically, one pair of coastal California gnatcatcher and a fledgling were observed 450 feet east of the BTR study area in 2018 and a single pair of coastal California gnatcatcher were observed within the Phase 2 and MHPA subtraction area in 2021. The area specific management directive for coastal California gnatcatcher requires measures to reduce edge effects and minimize disturbance during the nesting period, fire protection measures to reduce the potential for habitat degradation due to unplanned fire, and management measures to maintain or improve habitat quality including vegetation structure. No clearing of occupied habitat within the MHPA and within the County's Biological Resource Core Areas may occur between March 1 and August 15.

Direct impacts to coastal California gnatcatcher habitat would occur with the proposed project. Implementation of mitigation measure BIO-1 would minimize disturbance during the nesting period and ensure that occupied habitat within the MHPA is not cleared during the coastal California gnatcatcher breeding season. Mitigation measure BIO-3 would require on-site habitat mitigation within the MHPA, as shown in Figure 4, *Proposed Mitigation Area*. The MHPA boundary line adjustment would be beneficial for coastal California gnatcatchers and other covered species because the MHPA addition area contains more pristine coastal sage scrub than the disturbed subtraction area and would widen the MHPA corridor up the side canyon to the west, where the current MHPA design lacks habitat adjacent to the unnamed tributary at the bottom of the canyon. Permit conditions would also ensure long-term protection of this habitat occurs as part of the MHPA.

Indirect impacts to breeding gnatcatchers in the MHPA could occur if construction occurred during the breeding season and gnatcatchers were breeding in the portion of the MHPA adjacent to the construction. Noise impacts to breeding coastal California gnatcatchers located in the off-site MHPA would be considered potentially significant. Due to the project site's location adjacent to the MHPA, the Land Use Adjacency Guidelines would be required as a condition of the permit and would ensure that indirect impacts, including those associated with noise, to breeding coastal California gnatcatchers within the off-site MHPA do not occur during project construction. Based on the increased quality of habitat that would be provided by mitigation measure BIO-3 and the MHPA addition, avoidance of habitat clearing during the nesting season in accordance with mitigation measure BIO-1, and compliance with the Land Use Adjacency Guidelines, impacts to coastal California gnatcatcher are considered less than significant.

Mule deer, an MSCP covered species, was observed in the project area. The project would maintain the ability for this species to move throughout the project and MHPA areas. The proposed MHPA boundary line adjustment would ensure that areas removed from the MHPA would be replaced with equal or better habitat for use by mule deer. No direct impact to this species would occur; however, impacts to coastal sage scrub used by the species would be considered potentially significant. Mitigation measure BIO-3 would require on-site habitat mitigation within the MHPA, thus ensuring adequate habitat preservation for mule deer within the project vicinity. Conveyance of this land to the City, as required by permit conditions, would ensure long-term protection of this habitat. Impacts to mule deer are considered less than significant with the implementation of mitigation measure BIO-3.

The San Diego desert woodrat, a State Species of Special Concern, was presumed present in the BTR study area given observations of stick nests. Because nests were observed at multiple locations in the BTR study area, including within MHPA, significant impacts to the San Diego desert woodrat may occur with project implementation. Mitigation measure BIO-3 would compensate for the removal of San Diego desert woodrat habitat (coastal sage scrub) and would reduce impacts to a less than significant level.

Crotch's bumble bee, a State Candidate Endangered species, was observed within the project area during focused surveys. As such, the site is considered to be occupied by Crotch's bumble bee based on the positive survey and suitable habitat across the site that includes potential food sources and rodent holes for nesting. There would be a potential for direct impacts to individuals if vegetation removal occurred during the Crotch's bumble bee flight season (February 1 through October 31) and development of the impact area would result in the removal of suitable habitat for Crotch's bumble bee; therefore, impacts to Crotch's bumble bee and its habitat are considered potentially significant. Implementation of mitigation measure BIO-2 would require removal of suitable Crotch's bumble bee habitat to occur during the non-flight season (November 1 through January 31) and grading to occur during the next flight season (February 1 through October 31) while bees are mobile, thereby avoiding direct impacts to Crotch's bumble bee. An Incidental Take Permit from CDFW would also be required for the project and would need to be provided to the City prior to the issuance of a grading permit in accordance with mitigation measure BIO-2. The factors that make the project impact area suitable for Crotch's bumble bee are also present in the mitigation area. The mitigation area has a higher percentage and diversity of native species, providing nectar resources throughout the flight season. The soils within the mitigation area have been less disturbed than the impact area, which may make them less compacted and more suitable for nesting than the impact area. Therefore, habitat mitigation measure BIO-3 provides mitigation for impacts to potential Crotch's bumble bee habitat. With implementation of mitigation measures BIO-2 and BIO-3, impacts to Crotch's bumble bee would be reduced to a less than significant level.

The project site contains sensitive species and habitat that supports sensitive species, as designated by the U.S. Fish and Wildlife Service (USFWS) and CDFW. With implementation of mitigation measures BIO-1, BIO-2, and BIO-3, impacts to sensitive species and their habitats would be reduced to a less than significant level.

BIO-1 Biological Resource Protection During Construction: Prior to the issuance of any grading or landscaping permit, the City Manager (or appointed designee) shall verify that the following project requirements are shown on the construction plans:

IV. Prior to Construction

A. Biologist Verification – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

B. **Preconstruction Meeting –** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. **Biological Documents –** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. **Biological Construction Mitigation/Monitoring Exhibit –** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Avian Protection Requirements** – To avoid any direct impacts to any species identified as a listed, candidate, sensitive, or special status species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species, including white-tailed kite, southern California rufus-crowned sparrow, Bell's sage sparrow, coastal California gnatcatcher, and Cooper's hawk (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be

prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. **Resource Delineation –** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

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

V. During Construction

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

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

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

VI. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

BIO-2 Crotch's Bumble Bee Protection Requirement: Due to the presence of the candidate state endangered species Crotch's bumble bee (*Bombus crotchii*) and suitable habitat for the species within the project site, the following measures shall be implemented to reduce potential impacts to this species. The measures below shall only be required if Crotch's bumble bee remains as a candidate state endangered species or is listed as a state endangered or threatened species at the time of project construction. If Crotch's bumble bee is delisted, then impacts to the species would not be significant, and the measures below shall not be required.

Construction Timing: Before the issuance of any grading or landscaping permit, the City Manager (or appointed designee) shall verify that the following project requirements are shown on the construction plans. To minimize direct and indirect impacts to Crotch's bumble bee, removal of vegetation within suitable habitat shall be conducted during the non-flight season (November 1 through January 31), so that when the bees start flying, they will move out of the cleared area. Vegetation removal should be conducted in a manner to minimize soil disturbance, which could affect any Crotch's bumble bee nests, as well as to leave the roots of vegetation in place to help with ground stability until grading starts. Grading shall be conducted during the next flight season (February 1 through October 31) while the adult bees are mobile. Any deviation from this schedule would require CDFW approval and could require additional surveys. Suitable habitat within the project site consists of Diegan coastal sage scrub/*Artemisia californica-Salvia mellifera* Association (including disturbed), southern mixed chaparral/*Xylococcus bicolor-Quercus (berberidifolia)* Association, and coast live oak woodland/*Quercus agrifolia* Alliance.

Incidental Take Permit: Before the issuance of a grading permit, the project applicant shall conduct CESA-required consultation with CDFW regarding the project's effects to Crotch's bumble bee occupied habitat has occurred, and, if CDFW expects take of Crotch's bumble bee, that CDFW has authorized such take through an incidental take permit (pursuant to Fish & Game Code, § 2080 et seq), as applicable. The project applicant shall comply with the measures detailed in the take authorization issued by CDFW, which shall supersede any inconsistent measures provided in this report. The project applicant shall provide a copy of a fully executed take authorization to the City before implementing project ground-disturbing activities and vegetation removal.

Compensatory Mitigation: Permanent direct impacts to occupied Crotch's bumble bee habitat shall be offset through compensatory mitigation by preservation of Tier II habitat as described in mitigation measure BIO-3. However, if an incidental take permit is issued for the project that covers Crotch's bumble bee, that document shall supersede any inconsistent measures and mitigation ratios provided in this report.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

BIO-3 Compensatory Mitigation: As mitigation for impacts to less than 0.1 acre (0.03 acre) of Tier I habitat in Phase 1 and 5.2 acres of Tier II habitat (2.5 acres in Phase 1 and 2.7 acres in Phase 2), the project applicant shall preserve 0.03 acre of Tier I habitat and 5.2 acres of Tier II habitat. Compensatory mitigation for all habitat impacts shall be provided prior to the start of construction for Phase 1. A total of 0.19 acre of coast live oak woodland, 1.2 acres of southern mixed chaparral, and 0.1 acre of non-native grassland preserved in excess of mitigation requirements is reserved for compensatory habitat mitigation for future El Camino Memorial Park projects. The proposed mitigation area includes these acreages. Mitigation for impacts to Tier I habitat would occur in Tier I within the MHPA. Mitigation ratios assume all impacts are outside the MHPA and all mitigation is inside the MHPA (after boundary line adjustment).

b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐

The City's ESL Regulations and Biology Guidelines define sensitive biological resources as: lands included in the MHPA; wetlands; Tier IIIB and higher vegetation types; lands supporting species or subspecies listed as rare, endangered, or threatened; and lands containing narrow endemic species, vernal pool species, or covered species as listed in the City's Biology Guidelines. Impacts to Tier I and II habitat, as defined by the MSCP habitat classification system, are considered significant and require compensatory mitigation.

The project would result in a total of less than 0.1 acre (0.03 acre) of permanent, direct impacts to coast live oak woodland, a MSCP Tier I habitat, and 5.2 acres of Diegan coastal sage scrub (including disturbed), a Tier II habitat. Impacts to these species would occur outside of the MHPA. The project would also impact less than 0.1 acre of non-native vegetation and approximately 0.1 acre of developed land, neither of which are sensitive communities. The project would not impact any wetland vegetation communities; however, the 0.03-acre area of coast live oak woodland is considered CDFW jurisdictional riparian habitat.

Impacts to coast live oak woodland and Diegan coastal sage scrub are considered potentially significant and require compensatory mitigation. As the impacts to these sensitive communities would occur outside of the MHPA and mitigation is proposed within the MHPA after the proposed boundary line adjustment, impacts to Tier I and II habitat must be mitigated at a 1:1 ratio. Mitigation measure BIO-3 would require implementation of the compensatory mitigation and conveyance of the mitigation habitat to the City's MSCP preserve. Implementation of mitigation measure BIO-3 would fully compensate the loss of habitat proposed by the project and would reduce impacts to below a level of significance.

A Streambed Alteration Agreement would be required for impacts to 0.03 acre of CDFW jurisdictional riparian habitat pursuant to Section 1600 *et seq.* of the California Fish and Game Code. Mitigation measure BIO-4 details the proposed mitigation, consisting of on-site preservation and/or enhancement of CDFW-jurisdictional coast live oak woodland and non-native vegetation at a 2:1 ratio. The final details of mitigation for jurisdictional impacts would be determined in consultation

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

with CDFW as part of regulatory permitting prior to issuance of permits by the City. Compliance with mitigation measure BIO-4 and CDFW permitting requirements would reduce impacts to habitat within CDFW-jurisdictional areas to a less than significant level.

BIO-4 Notification of Lake or Streambed Alteration: Prior to issuance of permits by the City, the project applicant will submit Notification of Lake or Streambed Alteration to CDFW for impacts to 0.03 acre of CDFW jurisdictional riparian habitat pursuant to Section 1600 et seq. of the California Fish and Game Code and obtain either a Streambed Alteration Agreement, Operation of Law Letter, or written response from CDFW that a Streambed Alteration Agreement is not required. Proposed mitigation could consist of on-site preservation and/or enhancement of CDFW-jurisdictional riparian habitat at a 2:1 ratio or other on-site or off-site mitigation to the satisfaction of CDFW. The final details of mitigation for jurisdictional impacts will be determined in consultation with CDFW as part of the Section 1600 permitting process.

c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

An unnamed tributary to Carroll Canyon Creek bisects the project area and supports several potential jurisdictional areas that may be regulated by the U.S. Army Corps of Engineers, CDFW, Regional Water Quality Control Board (RWQCB), and/or City. These areas include southern riparian forest (disturbed), southern riparian woodland, coast live oak woodland, non-native vegetation, and non-wetland waters of the U.S./streambed that occur along this creek.

The project would not result in direct impacts to federally-, RWQCB-, or City-protected wetlands or vernal pools since the impact footprint and proposed clear-span bridge avoid the unnamed tributary and patches of disturbed southern riparian forest and southern riparian woodland, and no vernal pools occur on-site. As described under IV(b), impacts to riparian habitat under state jurisdiction (the CDFW) would be mitigated in accordance with the final conditions of a Streambed Alteration Agreement. No direct impacts to federally protected wetlands would occur.

The project includes an earthen drainage swale along the east side of the developed area, which would prevent runoff from landscaping from entering the adjacent wetlands and waters at the unnamed tributary to Carroll Canyon Creek. Runoff from the proposed road would flow into an inlet at the low point of the bridge and be routed into a stormwater biofiltration system before outfalling to a riprap energy dissipator near the existing streambed, thus maintaining the water supply and water quality to the wetland. The slope west of the road would sheet flow down the existing and graded slope and would be separated from the avoided wetland waters of the U.S./City-jurisdictional wetland by at least 65 feet of avoided habitat. The slopes would incorporate erosion control best management practices (BMPs) per the City's standards to prevent erosion into the avoided wetland area. The proposed swales meet the City's requirement to protect the functions and values of the avoided wetland. Therefore, no indirect effects to protected wetlands would occur and indirect impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

Wildlife corridors connect otherwise isolated pieces of habitat and allow movement or dispersal of plants and animals. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A corridor is a specific route that is used for the movement and migration of species and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stone linkages that are made up of a fragmented archipelago arrangement of habitat over a linear distance.

The BTR study area occurs along the Rattlesnake Canyon wildlife corridor identified in the Mira Mesa Community Plan. This corridor runs from northeast to southwest past the east side of the project footprint. The unnamed tributary canyon on the west side of the project footprint is also shown as part of the Rattlesnake Canyon wildlife corridor, but does not provide for regional wildlife movement because it ends surrounded by development to the north.

The proposed project would result in impacts approximately 400 feet in width, at the widest part of the project footprint. Wildlife would continue to be able to use the MHPA on either side of the project and would be able to travel between these MHPA areas, beneath the proposed bridge spanning the tributary channel. The opening underneath the bridge would be 75 feet wide, 28 feet long, and approximately 14 feet tall at the deepest point of the streambed. Native habitat occurs surrounding the site and would remain intact, extending a minimum of approximately 410 feet to the west of the project footprint, which would allow for continued use of the wildlife corridor that includes the unnamed tributary by animals in the vicinity. Native habitat extends over 1,900 feet to the east of Phase 1 of the project area, across the Rattlesnake Canyon wildlife corridor, identified as the area running northeast to southwest past the east side of the project footprint. The northern Phase 2 part of the project is proposed for construction adjacent to existing development. Wildlife access to the canyons north and south of the project would not be cut off by the implementation of the project. In addition, the project would not interfere with linkages identified in the MSCP or use of native wildlife nursery sites. Therefore, the proposed project would not substantially interfere with habitat connectivity or wildlife corridors and impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Impacts to biological resources in the City must comply with the City's ESL Regulations. The City's Biology Guidelines also restrict development within the MHPA. The project's impacts to species and habitats have been assessed in accordance with these guidelines and no conflicts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Policy 6.a of the Mira Mesa Community Plan applies to the project because of its location along Rattlesnake Canyon. The policy states: "Preserve (or restore if disturbed) riparian areas in Carroll and Rattlesnake Canyons to the full width of the floodplain. In order to foster conditions that allow for healthy ecological functioning and provide for adequate wildlife movement, upland habitat such as Coastal Sage Scrub, Grasslands and Maritime Chaparral shall be preserved or restored adjacent to the riparian area wherever possible to provide a buffer with a minimum width of 100 feet. The buffer may be reduced in width to accommodate the construction of Carroll Canyon Road and the future trolley alignment."

The project is consistent with Policy 6.a of the Mira Mesa Community Plan because proposed grading is set back at least 100 feet from the 100-year floodplain of Rattlesnake Canyon Creek and the Phase 2 area along Rattlesnake Canyon Creek would be landscaped with a native hydroseed mix, thus providing a buffer of at least 100 feet of upland coastal sage scrub habitat. The full width of the floodplain along Rattlesnake Canyon Creek would also remain available for wildlife movement. The project would also avoid impacting the 100-year floodplain of the tributary canyon on the west side of the project footprint, including where the proposed bridge spans the unnamed tributary. Project slopes adjacent to the MHPA would be planted with native coastal sage scrub vegetation, with native riparian plants down along the creek, providing an upland buffer to the riparian area.

The project is consistent with the City's Biology Guidelines, ESL Regulations, and Mira Mesa Community Plan. No conflict with local policies or ordinances protecting biological resources would occur and impacts would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

The project would conform with the adopted City MSCP Subarea Plan (1997). The project site is located adjacent the MHPA and proposes a boundary line adjustment, which may be made without amending the City's MSCP Subarea plan or the MSCP Plan in cases where the new MHPA boundary preserves an area of equivalent or greater biological value. The MHPA subtraction areas include Diegan coastal sage scrub (0.48 acre), disturbed Diegan coastal sage scrub (0.20 acre), and coast live oak woodland (0.01 acre). The MHPA addition area would occur to the west of the project site, between existing MHPA and the unnamed tributary to Rattlesnake Canyon Creek, and would encompass Diegan coastal sage scrub (0.74 acre), coast live oak woodland (0.07 acre), and southern mixed chaparral (0.01 acre). The MHPA addition area provides more than 1:1 replacement for the subtraction area in total acreage, Diegan coastal sage scrub acreage, and coast live oak woodland acreage, as well as replacing disturbed Diegan coastal sage scrub with higher quality Diegan coastal sage scrub. There would be a net increase in the amount of sensitive habitat within the MHPA as a result of the proposed adjustment, and the proposed addition areas are contiguous with existing similar habitat within the MHPA. In order for a boundary line adjustment to be approved, six findings must be made in accordance with Section 5.4.3 of the City's MSCP Subarea Plan. These six findings are discussed below:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

1. *Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly and sufficiently conserved habitats, as defined in Section 3.4.2 [of the MSCP Plan]).*

   The proposed boundary line adjustment would result in a net gain of 0.13 acre to the overall MHPA area. Specifically, the proposed boundary adjustment would involve the addition of 0.82 acre of upland habitats, in exchange for the removal of 0.69 acre of uplands. The coastal sage scrub to be removed from the MHPA consists partially of disturbed phase coastal sage scrub that has partially regrown in a previous olive orchard. The 0.74 acre of coastal sage scrub to be added to the MHPA is higher quality because it was not part of the historic olive orchard and supports a higher density of coastal sage scrub species. The MHPA addition area also supports seven times more coast live oak woodland than the MHPA subtraction area. No wetland habitats would be gained or lost. The proposed MHPA boundary results in an overall net gain in functional habitats.

2. *Effects on covered species (i.e., the exchange maintains or increases the conservation of covered species).*

   The 2021 coastal California gnatcatcher survey revealed gnatcatchers within the proposed MHPA subtraction area, while the 2018 survey detected gnatcatchers off-site to the east. This data shows gnatcatchers in two different locations in 2018 and 2021, therefore they can be expected to move around the area, including the MHPA addition area, from year to year. The MHPA boundary line adjustment would be beneficial for coastal California gnatcatchers and other covered species because the MHPA addition area contains more pristine coastal sage scrub and would widen the MHPA corridor up the side canyon to the west, where the current MHPA design lacks habitat adjacent to the unnamed tributary at the bottom of the canyon. The addition would offer habitat within the canyon a buffer from surrounding development and allow covered species to use the area into the foreseeable future. Covered species would also benefit because the area proposed for addition consists of a greater amount of sensitive habitat than the area proposed for subtraction. Also, the Diegan coastal sage scrub for addition consists of higher quality habitat, which would be more likely to support the coastal California gnatcatcher compared to the more disturbed subtraction area, a portion of which has olive trees remaining from its former use as an orchard.

3. *Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves any habitat linkages or wildlife corridors).*

   The proposed boundary line adjustment would not significantly affect the value of the MHPA within the study area as linkage and wildlife corridor. Wildlife moving through the area are most likely to follow riparian corridors. Most of the area proposed for subtraction is located up-slope from the Rattlesnake Canyon riparian corridor, with a small area proposed for subtraction along the tributary riparian corridor, while all of the area proposed for addition is located along the tributary riparian corridor, meaning that the adjustment improves the potential for wildlife movement along riparian corridors. The proposed minor adjustment in the crossing location is necessary to minimize the impact on riparian habitat and jurisdictional waters. The road crossing is designed as a clear span bridge, the best option for wildlife movement. The clear-

span bridge is 75 feet long and avoids the entire 100-year floodplain, thus maintaining the wildlife corridor function of the riparian area.

4. *Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection of biological resources).*

   The proposed MHPA boundary adjustment is not anticipated to have a negative effect on the management efficiency of the preserve because it would not change the balance of development and preserve in the area, and the MHPA addition is adjacent to existing MHPA. The MHPA addition area improves preserve configuration because it is located at least 170 feet from the existing cemetery and at least 80 feet, and across the creek, from the proposed cemetery expansion, as compared to the MHPA subtraction area that is located within 36 feet of the developed parking lot at the north end of the site.

5. *Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).*

   The areas proposed for subtraction from the MHPA consist of disturbed and undisturbed Diegan coastal sage scrub and coast live oak woodland that are contiguous with similar habitats in and outside the MHPA. The area proposed for addition to the MHPA consists of undisturbed Diegan coastal sage scrub, coast live oak woodland, and southern mixed chaparral that are contiguous with similar habitats in and outside the MHPA. The addition area is also contiguous to streambed along its whole length, making it more diverse than the subtraction area. Therefore, the proposed boundary line adjustment would not result in any negative effects on structural diversity or ecotones in the MHPA.

6. *Effects on species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state ESAs).*

   The proposed boundary adjustment would not increase the likelihood that an uncovered species will be significantly impacted and meet the criteria for listing under federal or state ESAs, including the Crotch's bumble bee. The areas proposed for removal consist of a smaller amount of sensitive habitat than those proposed for addition. Also, the Diegan coastal sage scrub areas proposed for subtraction consist of more degraded (i.e., disturbed) habitat than the addition area. A portion of the subtraction areas have olive trees remaining from their former use as an orchard, making them less important for the conservation of species of concern compared to the proposed addition area. Therefore, the proposed boundary adjustment would be beneficial to the Crotch's bumble bee and other uncovered species.

The City's MSCP Subarea Plan addresses the impacts to preserve areas from adjacent development in Section 1.4.3, Land Use Adjacency Guidelines. The Land Use Adjacency Guidelines provide requirements for land uses adjacent to the habitat preserve in order to minimize indirect impacts from drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading to the sensitive resources contained therein. The project site is located adjacent the MHPA and proposes a boundary line adjustment. The project's consistency with the City's Land Use Adjacency Guidelines is summarized below:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Drainage

- *All new and proposed development adjacent to the MHPA must not drain directly into the preserve, and must 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.*

  Implementation of BMPs during construction, as well as compliance with City landscape regulations in the landscape design, would prevent drainage from the project flowing directly into the MHPA. The proposed project includes a drainage swale and a biofiltration basin to prevent discharges of untreated storm water into the MHPA.

Toxins

- *Land uses such as recreation and agriculture that use chemicals or generate byproducts that are potentially toxic or harmful to wildlife, habitat, or water quality must incorporate measures to reduce the impact of application or drainage of such materials into the MHPA.*

  The proposed land use is a cemetery, which would involve landscaping typical of residential and commercial development. The landscaped slopes would be maintained by the cemetery, and any chemicals would be applied following applicable laws and requirements to reduce their potential impact on the proposed biological open space or drainage into the MHPA.

Lighting

- *Lighting must be directed away from the MHPA and, if necessary, adequately shielded to protect the MHPA and sensitive species from night lighting.*

  The cemetery expansion is not a land use that would produce excessive light spill. The existing cemetery is closed at sunset and does not include lighting. Therefore, the project would not introduce night lighting to the MHPA.

Noise

- *Uses adjacent to the MHPA must be designed to minimize noise that might impact or interfere with wildlife utilization of the MHPA.*

  The off-site MHPA within 500 feet of the impact area has marginal potential to support breeding coastal California gnatcatchers. Potential impacts of construction noise on gnatcatchers would be avoided by implementation of the coastal California gnatcatcher protection requirements, which would be made a condition of project permits and shown on the construction plans.

  Once constructed, cemetery operations are not expected to generate noise exceeding 60 dBA hourly average at the edge of occupied habitat. Therefore, the project would not have construction-phase or operational noise impacts that would impact or interfere with wildlife utilization of the MHPA.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Barriers

- *New development adjacent to the preserve may be required to provide barriers along MHPA boundaries to redirect public access to appropriate locations and reduce domestic animal predation in the preserve.*

  After the boundary line adjustment, the southwestern portion of the project footprint would be separated from the MHPA by avoided habitat areas; however, the MHPA boundary would be located along the northwest and southeast portions of the Phase 2 impact area. Three strand cable fencing or similar barriers would be placed where the project footprint adjoins the adjusted MHPA. In addition to fencing, the project landscaping plan includes a strip of native vegetation along project edges that are adjacent to existing native habitat, which would also discourage incursion into the MHPA. Additionally, human activity and visitation would be limited within the project footprint which would protect the MHPA from public access.

Invasive Plant Species

- *No invasive plant species shall be introduced into areas adjacent to the MHPA.*

  No invasive plant species would be used in the landscape plans. The main part of the project footprint would be landscaped with turf grass with holly oak (*Quercus ilex*) and Chinese elm (*Ulmus parvifolia*) trees. A buffer of native species would be planted between the project footprint and the MHPA, with coastal sage scrub species on the slope and native willows, mule fat, and coast live oak at the bottom of the slope near the creek. These areas would also be seeded with native hydroseed. In the Phase 2 area, Coast Live Oaks and California Sycamores would be planted.

Brush Management

- *New residential development located adjacent to and topographically above the MHPA must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA.*

  The project does not include residential development. Thus, no brush management is proposed that would extend into the biological open space or the MHPA.

Grading/Land Development

- *Manufactured slopes associated with project development must be included in the project footprint.*

  No manufactured slopes associated with the proposed project would extend into the MHPA and manufactured slopes are included in the project footprint.

As described under each guideline above, the project would be consistent with the MHPA Land Use Adjacency Guidelines given adherence to permit conditions. In addition to the project's consistency

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

with the MHPA Land Use Adjacency Guidelines, the on-site mitigation area would be preserved and managed in perpetuity by the City in accordance with applicable permit conditions. The project would not conflict with the provisions of the MSCP, the adopted local habitat conservation plan. Therefore, impacts would be less than significant.

V. CULTURAL RESOURCES

– Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒

According to the City's Thresholds, for the purposes of CEQA, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The City's Thresholds state that the determination of significance for historic buildings, structures, objects, and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

HELIX prepared an Archaeological Resources Report Form for each phase of the proposed project to analyze potential project impacts to cultural resources (HELIX 2021; HELIX 2023). The Archaeological Resources Report Forms each included a records search, a Sacred Lands File search, Native American outreach, a review of historic maps and aerial photographs, and a field survey with a Kumeyaay Native American monitor.

According to the South Coastal Information Center record search results, a total of 32 cultural resources have been previously recorded within one mile of the Phase 1 area and 37 cultural resources have been previously recorded within one mile of the Phase 2 area. The search areas for Phase 1 and Phase 2 overlap; therefore, many of these resources are duplicated within the number of resources noted in each search. None of the resources identified in the Phase 1 records search were located within or directly adjacent to the project site and one resource, described in the following paragraph, was identified within the Phase 2 project area. These resources consist primarily of prehistoric artifact scatters, lithic scatter, resource production sites, camp and habitation sites, and prehistoric isolates. Five historic resources were identified within the cultural resource search results and consist of the remains of a historic adobe; the remains of a historic home with associated refuse; a segment of the AT&SF railroad, originally the California Southern Railroad; portions of the remains of historic corrals; and a section of a historic fence. The lack of buildings identified on historic maps and aerial photos in the project area indicates concrete remnants identified within the project area were dumped there, rather than remnants of a building or structure.

The Phase 1 Archaeological Resources Report Form identified a historic orchard within the Phase 1 site, which became visible on historic aerials beginning in 1941. The remnants of the olive orchard were recorded, but many of the trees have died or been removed. There is no evidence to suggest

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

that the orchard was associated with events or persons significant to the history of the area, nor does it embody the distinctive characteristics of a type, period, region, or method of construction, nor represent the work of a master or possess high artistic values; it does not possess the potential to yield information important to the prehistory or history of the area. In addition, the integrity of the orchard has been severely compromised. Based on this, it is not considered a significant historic or archaeological resource.

As there are no existing structures within the project site and the orchard is not considered a significant historic resource, the project would not cause a substantial adverse change in the significance of a historical resource. No impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

The City's determination of significance of impacts on unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines and the City's Historical Resources Guidelines. The City's Thresholds state that an archaeological site must consist of at least three associated artifacts/ecofacts (within a 40-square meter area) or a single feature. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. (Testing is required to document the absence of subsurface deposit.) Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site, including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance. The City's Thresholds also state that archaeological sites may comprise traditional cultural properties for the Native American community.

As described in V(a), while the South Coastal Information Center record search identified numerous cultural resources within a one-mile radius of the project site, it did not identify archaeological resources within the project site. During the field survey for Phase 2, two isolated lithic flakes and one lithic tool were identified and recorded on Department of Parks and Recreation forms. As isolated finds, these artifacts do not meet the criteria for listing on the California Register of Historical Resources and are not considered significant cultural resources for the purposes of CEQA.

The three isolated finds during the Phase 2 survey were also determined not to be significant cultural resources. In addition to the South Coastal Information Center record search, HELIX requested a review of the Native American Heritage Commission (NAHC) Sacred Lands File. The results of the Sacred Lands File review were negative according to the NAHC response dated July 27, 2021.

As there are no archaeological resources known to occur within the project site, the project is not anticipated to cause a substantial adverse change in the significance of an archaeological resource. However, given the cultural resource sensitivity of the project vicinity, there is a potential for cultural resources to be encountered during construction/ground-disturbing activities within the project

area and impacts to these resources could be potentially significant. Therefore, an archaeological and Native American monitoring program was recommended in both of the Archaeological Resources Report Forms to be implemented during ground-disturbing activities within the project area. This monitoring program would follow the City's standard archaeological monitoring requirements, provided as mitigation measure CUL-1. With implementation of the recommended monitoring program required by mitigation measure CUL-1, the project would not result in a substantial adverse change in the significance of an archaeological resource and impacts would be less than significant.

CUL-1 Archaeological and Tribal Cultural Resources Monitoring:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/ Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Submit Letters of Qualification to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. MMC shall provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant shall obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (1/4-mile radius) has been completed. Verification includes but is not limited to a copy of a confirmation letter from South Coastal Information Center, or,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

3. The PI may submit a detailed letter to MMC requesting a reduction to the 1/4-mile radius.

B. Principal Investigator Shall Attend Preconstruction Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Preconstruction Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

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

2. Identify Areas to be Monitored

    a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.

    b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.

    a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

    b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

    c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.

2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.

2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.

3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains are determined to be Native American

1. The Medical Examiner will notify the NAHC within 24 hours. By law, ONLY the Medical Examiner can make this call.

2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.

3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:

    a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the

site, OR the landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN in order to protect these sites, the landowner shall do one or more of the following:

(1) Record the site with the NAHC;

(2) Record an open space or conservation easement; or

(3) Record a document with the County.

D. If Human Remains Are NOT Native American

1. The PI shall contact the medical examiner and notify them of the historic-era context of the burial.

2. The medical examiner will determine the appropriate course of action with the PI and city staff (PRC 5097.98).

3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, the EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

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

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction meeting.

2. The following procedures shall be followed.

a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8:00 a.m. of the next business day.

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

and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

d. The PI shall immediately contact MMC, or by 8:00 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction:

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

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

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

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with State of California Department of Parks and Recreation.

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

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

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

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

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

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

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

3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The Archaeological Resources Report Forms prepared for the project found no evidence to suggest the presence of human remains within the project site. In the unlikely event that human remains are encountered during ground-disturbing activities, per the California Public Resources Code Section 5097.98, all work shall cease, and the county coroner shall be contacted. Should the remains be identified as Native American, the NAHC shall be contacted within 48 hours to provide a most-likely descendant to determine appropriate actions. Compliance with the processes required by the California Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5 would ensure impacts to human remains would be less than significant.

VI. ENERGY

– Would the project:

a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Energy use during construction would occur within two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. The construction equipment required for site grading and roadway installation would include typical construction vehicles such as a grader, loader, excavator, and paver. Hauling of 305 cy of soil export would require approximately 20 round trips given a typical hauling truck capacity of 16 cy. The project would not require large-scale construction activities that could consume substantial amounts of fuel or other forms of energy. Fuel consumption associated with hauling and construction worker commutes would be similar of other typical construction trips in the region, and would not result in a wasteful, inefficient, or unnecessary consumption of gasoline or diesel fuel.

There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical equipment fuel consumption rates. Additionally, construction activities would be temporary and short-term. Therefore, project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Once construction of the project is complete, minimal amounts of fuel consumption would be associated with routine maintenance and ongoing burials. Further, these activities are not expected to require increased energy compared to existing conditions. No operational lighting is proposed and new irrigation installed within the expanded areas would be powered by solar. Therefore, the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

The project is subject to the City's Climate Action Plan (CAP), which intends to reduce greenhouse gas (GHG) emissions through strategies including improving energy efficiency. Consistency with the CAP is determined by whether a project is compatible with its land use designation and whether it complies with San Diego Municipal Code Chapter 14, Article 3, Division 14 (CAP Consistency Regulations). First, the project is consistent with the site zoning and land use designations and is within a Transit Priority Area. The project is not subject to the CAP Consistency Regulations based on the proposed project type, but completed a CAP Checklist, which was the method of implementing the CAP prior to adoption of the CAP Consistency Regulations.[1] Energy reduction measures provided in this checklist were determined not to be applicable to the proposed project since it does not propose buildings. Therefore, while no specific energy reduction measures related to the CAP apply to the project, the project would be consistent with the CAP given its consistency with the planned land use. See VIII(a) for further discussion. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impact would occur.

VII. GEOLOGY AND SOILS

– Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

Under the Alquist-Priolo Earthquake Fault Zoning Act, the California State Geologist identifies areas that are at risk from surface fault rupture, generally along active faults, where structures for human occupancy should be prevented. The project site is not within an Alquist-Priolo Earthquake Fault Zone. According to the City's Seismic Safety Study (City 2008), there are several faults/fault zones within the project area to the south and west, but none are considered active faults. The nearest active fault is the Rose Canyon Fault, located approximately 10 miles from the area. In addition, no structures for human occupancy would be constructed as part of the proposed project. Therefore,

[1] The CAP Checklist for the project was completed with a prior project application, which occurred prior to adoption of the CAP Consistency Regulations on September 21, 2022.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

the risk of loss, injury, or death, involving rupture of a known earthquake fault is considered low. Impacts would be less than significant.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The project site, like most of southern California, is within a seismically active area and can be subject to strong seismic ground shaking. Table 2-6 of the Mira Mesa Community Plan Update EIR demonstrates that earthquakes in the region could result in ground shaking of up to 7.7 maximum moment magnitude within the Community Plan area. While the project site is likely to experience ground shaking in the event of an earthquake along one of the regional faults, no habitable structures would be constructed and all project components would be subject to the appropriate geotechnical design recommendations and applicable regulations. Geotechnical Soilutions, Inc. prepared a Geological and Geotechnical Investigation for the proposed project (2021), which determined that the project site is suitable for the proposed project given incorporation of the report's recommendations. The project would implement these recommendations and would not result in adverse effects in the event of strong seismic ground shaking at the project site. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Liquefaction is a soil phenomenon in which water-saturated soils lose strength when subject to the forces of intense and prolonged ground shaking. According to the City's Seismic Safety Study, high liquefaction potential occurs in and around the streambed that runs through the project site. However, the project-specific geotechnical study found that there is a low potential for liquefaction due to the presence of bedrock near the surface of the site. No habitable structures would be created by the project. The bridge that would be constructed over the stream to allow access to the majority of the project site would be constructed in accordance with the applicable geotechnical recommendations and regulations, which would reduce potential risks related to liquefaction. Therefore, the project would not result in adverse effect due to liquefaction and impacts would be less than significant.

iv) Landslides?	☐	☐	☒	☐

The project's geotechnical report concludes that the project site is stable and would not become unstable as a result of project implementation. Therefore, the project site is not anticipated to be exposed to hazards related to landslide activity and impacts would be less than significant.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

The proposed project would include vegetation removal and grading activities that would remove existing ground cover and disturb exposed soils. These disturbed soils could be exposed to wind and rain, thus potentially resulting in soil erosion. The project would require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit and be required to submit a Notice of Intent to the RWQCB for the preparation of a Stormwater Pollution Prevention Plan (SWPPP). In addition, the project would be a Priority Development Project based on the

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

development of 10,000 square feet of impervious surfaces, the project location on a hillside, and development discharging into an Environmentally Sensitive Area. Therefore, the City required a Stormwater Quality Management Plan (SWQMP) be created for the project. Generally, a SWPPP and SWQMP demonstrate how water quality during construction and operation of a project would be maintained in accordance with mandated objectives. This is achieved by employing BMPs (see Section X, *Hydrology and Water Quality*), which typically serve a dual purpose of protecting water quality and reducing soil erosion and loss of topsoil. Prior to the issuance of a grading permit, the City requires that an applicant demonstrates compliance with the required NPDES permits and regulations.

Grading activities would also be required to comply with the City's Grading Ordinance and Storm Water Standards, which would further ensure soil erosion and topsoil loss is minimized. Therefore, the project would not result in substantial soil erosion or loss of topsoil and impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

The project's geotechnical report performed a stability analysis, which concluded that the proposed project slopes would have a minimum safety factor of 1.5 against static failure and 1.1 against pseudo-static failure. These safety factors comply with the minimums acceptable by the applicable building codes. In addition, as discussed in VII(a)(iii) and VII(a)(iv), no significant risks related to landslide or liquefaction would occur. The project site would not become unstable as a result of project implementation and impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒

According to the project's geotechnical report, the soils on the project site have a low expansion potential (Expansion Index of 12). Retaining walls and slabs would be constructed in accordance with the recommendations in the geotechnical report for construction in soils with this Expansion Index. In addition, the project would not construct habitable structures that would be put at risk by construction within these soils. The project would not be located on expansive soils and would not result in risks to life or property. No impact would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

The project does not propose the use of septic tanks or alternative wastewater disposal systems; the project site would be served by the existing public sewer system. Therefore, no impacts regarding the capability of soils to support such systems would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The City's Thresholds state that a significant impact to paleontological resources could occur in formations with a high sensitivity rating if grading would exceed 1,000 cy and would occur at a depth of 10 feet or more. In accordance with San Diego Municipal Code Section 142.0151, paleontological monitoring would be required if grading exceeds these thresholds. The project site is underlain by the Stadium conglomerate geological formation, which has a high sensitivity rating for paleontological resources. During construction, while site grading is anticipated to require the movement of more than 1,000 cy of soil, excavation would only occur at depths of up to 5.5 feet. Future burials would occur at depths of up to five feet as well. Therefore, the project would not exceed the threshold for requiring paleontological monitoring. Pursuant to San Diego Municipal Code Section 142.0151(b), if paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, all grading in the area of discovery shall cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources. Based on regulatory compliance, impacts to unique paleontological or geological features would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

– Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

The City's Thresholds state that for project-level environmental documents, the significance of impacts related to GHG emissions is determined through land use consistency analysis and the project's compliance with the regulations set forth in the CAP Consistency Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 14). Projects that are consistent with the CAP, as determined through land use consistency and compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impacts analysis of GHG emissions.

The first step in determining CAP consistency for development projects is to assess the project's consistency with the growth projections used in the development of the CAP. Since the proposed project is consistent with the existing General Plan and Community Plan land use and zoning designations, the project is consistent with the assumptions included in the CAP.

The second step in demonstrating consistency with the CAP is implementation of the regulations set forth in San Diego Municipal Code Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. The project is not subject to these regulations, as it does not propose three or more dwelling units, non-residential development of more than 1,000 square feet and 5,000 square feet of gross floor area, or a parking facility.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Prior to the adoption of the CAP Consistency Regulations, the City's CAP was implemented through the use of a checklist, which was completed for the project due to the project's entitlement process beginning prior to the adoption of the CAP Consistency Regulations. The checklist similarly evaluates land use consistency and CAP strategies for individual projects. As discussed above, the project is consistent with the site zoning and land use designations. None of the CAP strategies identified in step two of the checklist are applicable to the proposed project.

While no CAP regulations or strategies apply to the proposed project, the project would be consistent with the land use assumptions contained in the CAP. Since the project would be consistent with the planned land use and is not required to comply with the CAP Consistency Regulations, the project would not result in GHG emissions that would have a significant impact on the environment. Impacts would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The City's CAP has been developed in response to State legislation and policies that are aimed at reducing California's GHG emissions. As described above, the project would be consistent with the City's CAP. Therefore, the project would be consistent with the applicable State plans, policies, and regulations aimed at reducing the emission of GHGs. Impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

– Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

The City's Thresholds states that significant impacts may occur if a project proposes the handling, storage, and treatment of hazardous materials. Materials and waste are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The transportation, use, and disposal of hazardous materials, as well as the potential releases of hazardous materials to the environment, are closely regulated through many state and federal laws.

Construction activities associated with the proposed project would require transportation and use of limited quantities of fuel, oil, sealants, and other hazardous materials related to construction. During project operation, the project may require the use of limited hazardous materials for landscaping and maintenance activities. The use of hazardous materials and substances would be subject to federal, state, and local health and safety requirements for handling, storage, and disposal. As a result, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐

The City's Thresholds state that project sites on or near known contamination sources and/ or that meet one or more of the following criteria may result in a significant impact if:

- A project is located within 1,000 feet of a known contamination site;
- A project is located within 2,000 feet of a known "border zone property" (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code;
- The project site has a closed Department of Environmental Health site file;
- A project is located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites;
- A project is located on or near an active or former landfill;
- A project is located on properties historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater;
- A project is located in a designated airport influence area where the FAA has reached a determination of "hazard" through FAA Form 7460-1, is inconsistent with an Airport's Land Use Compatibility Plan (ALUCP), or is within two nautical miles of a public or public use airport; or
- A project is located on a site presently or previously used for agricultural purposes.

The project site does not contain a known contamination site, as discussed further in IX(d). The site has also not been used for dewatering, is not on or near an active landfill, and is not within an airport hazard zone. However, a portion of the project site was previously used for agriculture and contained an olive orchard. While the specifics of the former agricultural use are not known, the former orchard was located in the eastern and southeastern portions of the project site. It was visible on historic aerial maps beginning around 1940, and evidence of the orchard is still visible with the generally linear configuration of trees in this area of the site. Additionally, large agricultural fields were previously located to the south and west between 1953 and 1963. As a result of these former agricultural operations on and off site, there is potential for residual concentrations of pesticides/herbicides within underlying soils to result in a significant impacts related to hazardous materials release. Implementation of mitigation measure HAZ-1 would reduce impacts to below a level of significance.

As with typical construction, there is the possibility of accidental release of hazardous substances during construction activities. Specifically, construction activities generally include the use of fuels,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

oils, lubricants, paints, and solvents. Construction activities would be short-term, and the use of these materials would cease once construction is complete. The use of hazardous substances during construction would occur in compliance with existing federal, state, and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction, containment and clean up would occur in accordance with existing applicable regulatory requirements, reducing impacts to a less than significant level.

During project operation, the project would include the use and transport of common hazardous materials used for maintenance and landscaping. However, compliance with applicable federal, state, and local regulations regarding the use and transport of such materials would ensure that potential impacts to the public or the environment through reasonably foreseeable accident conditions would be less than significant during project operation.

HAZ-1 Soil Testing: Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/ Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the applicant shall provide, in letter form, to the Mitigation Monitoring and Coordination Section (MMC) the results of soils testing for the area previously used as an orchard. If initial testing of this area does not reveal contaminated soils (containing contaminants exceeding the screening levels in CCR Title 22, Division 4.5), the results shall be provided to the MMC and no further action would be required. If contaminated soils are identified during initial testing, the applicant shall provide verification in letter form to the MMC that the County of San Diego, Department of Environmental Health and Quality has reviewed and approved the proposed Soil Management Plan and, if required based on the level of contamination identified, the proposed Health and Safety Work Plan for the treatment and disposal of hazardous materials or contaminated soils that may be encountered within the project site. If required, the Soil Management Plan and Health and Safety Plan shall be prepared in accordance with requirements of the County of San Diego and shall comply with other applicable federal, state, and local requirements related to hazardous materials.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

The City's Thresholds states that significant impacts may occur if a project proposes the emission of hazardous or acutely hazardous materials or may handle acutely hazardous materials with one-quarter-mile of a school. There are no existing or proposed schools within one-quarter mile of the project site. The nearest school to the project site is Jonas Salk Elementary School, located approximately 1.4 miles northeast of the site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

See IX(b) above for applicable City Threshold related to listed hazardous materials sites. Government Code 65962.5 stipulates that specific agencies identify and update annually a list of sites that have been reported to have certain types of contamination. The State Water Resources Control Board (SWRCB) GeoTracker database and the Department of Toxic Substances Control (DTSC) EnviroStor database provide information on hazardous materials sites. GeoTracker provides access to regulatory data about sites that require cleanup action, including leaking underground storage tanks, Department of Defense sites, and Cleanup Program sites. EnviroStor identifies sites that have known contamination or sites where there may be reasons to investigate further. It also identifies facilities that are authorized to treat, store, dispose, or transfer hazardous waste.

A search of the SWRCB GeoTracker database and the DTSC EnviroStor database was completed for the project site pursuant to Government Code Section 65962.5. The project site was not listed on either of the hazardous materials databases and no open cases are located within 1,000 feet of the project site. For purposes of public disclosure, it is noted that there are two properties located west of the overall cemetery property that are listed on GeoTracker; however, the cases have been closed since 1999 and 2010.

The project would not create a significant hazard to the public or the environment related to listings on hazardous materials sites, as the project site does not have any listings and there are no active listings within 1,000 feet of the project site. No impact would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐

The City's Thresholds state that a project may result in a significant impact if it is located in a designated airport influence area and where the FAA has reached a determination of "hazard" through FAA Form 7460-1, "Notice of Proposed Construction or Alteration", is inconsistent with an ALUCP, or, where a ALUCP has not been adopted, is within two nautical miles of a public or public use airport. The MCAS Miramar ALUCP specifies exterior noise levels of up to 75 Community Noise Equivalent Level (CNEL) are compatible with cemeteries so long as where noise levels are between 65 and 75 CNEL, interior spaces are designed to have interior noise levels of 45 CNEL. The basic function of ALUCPs is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to incompatible uses.

The project site is within the AIA Review Area 1 and the FAA Part 77 Height Notification Area for MCAS Miramar (San Diego County Airport Land Use Commission 2011). Since the project site is located outside of the Safety Zones for MCAS Miramar, there are no land use compatibility conflicts

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

between the airport and proposed project related to safety. The area for sidewalk and ramp improvements on Carroll Canyon Road would be within Accident Potential Zone 2 but a new land use is not proposed in this area that would conflict with the ALUCP. The project would not construct features that would reach the height of the FAA Part 77 Height Notification Area; therefore, no hazards related to this overlay would occur.

The project site is located within the 65 to 70 CNEL contours associated with MCAS Miramar. As described above, this exterior noise level is consistent with the ALUCP land use compatibility criteria if interior spaces achieve noise levels of 45 CNEL. As no interior spaces are proposed by the project, no conflicts related to noise from MCAS Miramar would occur.

The project would not create a safety hazard to airport activities and would not result in a hazard or excessive noise for people working or visiting the project site. As such, impacts would be less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

The City is a participating entity in the Multi-jurisdictional Hazard Mitigation Plan (County 2018), which is generally intended to provide compliance with regulatory requirements and increase County-wide coordination associated with emergency response efforts. As part of this effort, the City's Office of Emergency Services oversees emergency preparedness and response services for disaster-related measures. For emergency evacuation, the Mira Mesa Community Plan identifies Interstate (I-) 15 and I-805 as emergency evacuation routes in the vicinity of the project site. The project would not involve any activities that would impair the continued use of these routes.

Construction of the proposed roadway extension would not result in the need for lane closures, as construction would occur within a currently undeveloped portion of the existing property. Construction of sidewalk and ramp improvements along Carroll Canyon Road would require a public improvement permit and traffic control permit to ensure no conflicts with emergency plans would occur. Heavy construction vehicles could occasionally slow traffic along roadways during construction; however, such delays would be brief and infrequent. After construction, the project would not result in changes to the operation of Carroll Canyon Road or other nearby roadways required for emergency response and evacuation. Impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

The potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists adjacent to open space or within proximity to wildland fuels. State law requires that all local jurisdictions identify Very High Fire Hazard Severity Zones (VHFHSZ) within their areas of responsibility (California Government Code Sections 51175–51189). These maps, which are prepared by the City in collaboration with the California Department of Forestry and Fire Protection (CAL FIRE) determine fire hazards zones based on vegetation density, slope severity, and other relevant factors that contribute to fire severity.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

According to the Official Very High Fire Hazard Severity Zone Map adopted by the City's Fire-Rescue Department for the project area, the project site is located within a VHFHSZ. Since the project does not propose structures, a brush management zone is not required and no structures would be at risk of loss related to wildland fires. The proposed project would comply with the California Fire Code and has been reviewed by the City's Fire-Rescue Department. The project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

X. HYDROLOGY AND WATER QUALITY

– Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

According to the City's Thresholds, compliance with water quality standards is assured through permit conditions for private projects, such as the proposed project. The project is required to adhere to the City's Stormwater Standards, which require preparation of a SWQMP for the project, as it is a Priority Development Project. Project-level compliance with the City's Stormwater Standards is intended ensure compliance with the regional Municipal Separate Storm Sewer System (MS4) Permit. Kreuzer Consulting Group prepared a Hydrology Study for the project, which indicated the features required to comply with the applicable water quality standards.

Since the majority of the project site would consist of pervious surfaces, runoff is primarily anticipated to result from the roadway extension portion of the project. Runoff from the roadway would be collected and treated with a Modular Wetlands biofiltration system prior to being released to the creek bed below the project site. The Modular Wetlands biofiltration treatment system would slow flow rates and discharge flows through rock riprap before they reach the creek bed.

During construction, the project would be required to comply with the NPDES Construction General Permit and implement BMPs to reduce pollutants in the stormwater to the maximum extent practicable. Typical construction-related BMPs include temporary soil stabilization (e.g., straw mulch, wood mulch, drainage swales), temporary sediment control (e.g., silt fence, sediment track, fiber rolls, sandbag barrier), de-watering, vehicle equipment maintenance and cleaning, and tire cleaning.

Adherence to the NPDES Construction General Permit during construction and the City's Stormwater Standards during operation would ensure that the project does not violate water quality standards or waste discharge requirements.

In addition to NPDES requirements, states are required to identify and document polluted surface water bodies, with the resulting documentation referred to as the Clean Water Act Section 303(d) List of Water Quality Limited Segments. This list of water bodies identifies the associated pollutants and total maximum daily loads (TMDLs), along with projected TMDL implementation schedules/ status. A TMDL establishes the maximum amount of an impairing substance or stressor that a water body can assimilate and still meet water quality standards and allocates that load among pollution contributors. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

region. The receiving waters for the project site that are currently listed as impaired (based on the 2020 303[d] List) include Carroll Canyon Creek, which is listed for pollutants including benthic community effects, cyfluthrin, pyrethroids, and toxicity (RWQCB 2020). Implementation of applicable BMPs would ensure that the proposed project would not create adverse water quality impacts to Carroll Canyon Creek.

The project is not anticipated to otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

The City's Thresholds state there may be significant impacts on groundwater supplies if a project would result in decreased aquifer recharge because the area available for aquifer recharge is reduced. This may occur when more than one acre of impermeable hardscape is installed where well-water is utilized or where a well would be installed. A significant impact may also occur if commercial or multi-residential projects propose the use of groundwater as a source of water supply.

The City, which would provide water to the project site, purchases water from the San Diego County Water Authority (SDCWA), the regional wholesale water provider. In all, groundwater comprises five percent of the SDCWA water portfolio according to the City's Urban Water Management Plan (UWMP). The project would primarily require recycled water supplies to use for landscaping with minor amounts of potable water required for human use. The project would not specifically require groundwater as a source of water supply.

There is no groundwater production currently occurring at the project site; therefore, there would be no disruption to any existing groundwater production. In addition, the project site is not within a groundwater basin with an adopted groundwater sustainability plans. The project would increase impervious surface area by 0.65 acre and would not substantially interfere with groundwater recharge.

The project would not result in substantial demand for groundwater resources and would not increase impervious surfaces such that groundwater recharge would be substantially impeded. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

The City's Thresholds state that a significant impact related to erosion or siltation may occur if a project would grade, clear, or grub more than one acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream or result in uncontrolled runoff.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Runoff from the project site currently sheet flows in the southwest and southeast directions to the existing creek beds on the west, south and east sides of the proposed project area. With implementation of the project, drainage within the burial areas would remain similar to existing conditions while flows from the proposed roadway would be captured for treatment. As discussed in X(a), the project would include a Modular Wetland system, which would slow runoff from the new roadway prior to being discharged into the creek. In addition, the Hydrology Study states that overall flows into the creek bed would be increased by approximately six percent during 10- and 50-year storm events. This slight increase in flows would not be associated with substantial changes to creek drainage or associated erosion or siltation. While the project would grade more than one acre of land, the resulting runoff would not be uncontrolled such that downstream erosion or siltation would occur. Impacts would be less than significant.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

The City's Thresholds state that significant impacts may occur if a project would impose flood hazards on other properties or if the project proposes to develop within the 100-year floodplain identified in the Federal Emergency Management Agency (FEMA) maps.

The unnamed tributary that would be spanned by the proposed bridge is partially located within FEMA Zone A, which is an area within the 100-year floodplain without a determined base flood elevation. Based on its location, a floodplain analysis for the project was prepared by PACE Advanced Water Engineering and the bridge supports have been placed outside of the FEMA floodplain. Since the project components would be located outside of the floodplain, the project would not alter flooding conditions surrounding the project site. In addition, as described in X(c)(i), flows during 10- and 50- year storm events would increase by approximately six percent under the project condition and a Modular Wetland treatment system would be installed to accommodate runoff from the new pervious surface of the proposed roadway. These changes in hydrology by the proposed project would not substantially increase the rate or volume of runoff such that on- or off-site flooding would occur.

According to the floodplain analysis, a Conditional Letter of Map Revision from FEMA is not required for the proposed project improvements. The project is not anticipated to result in substantial increases in runoff that contribute to flooding and no further approval by FEMA is anticipated to be required. Impacts would be less than significant.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

As discussed in X(b), the project would result in the addition of 0.65 acre of impervious surfaces. The additional runoff that would result from the roadway portion of the project would be collected and treated on-site prior to being discharged to the creek downhill of the project. The creek would be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

able to accommodate the slight increase in flows and the project would not result in the capacity of the City's storm water drainage system being exceeded. In addition, as detailed in X(a), runoff from the project site during both construction and operation would be treated such that it would comply with the applicable water quality standards and would not be a substantial source of polluted runoff. Impacts would be less than significant.

iv) impede or redirect flood flows?	☐	☐	☒	☐

See X(c)(i). No development within the floodplain is proposed and the project would not impede or redirect flood flows. Impacts would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

See X(c)(i) for discussion of impacts related to flood hazard zones. The project site is located approximately four miles from the Pacific Ocean and at a minimum elevation of 195 feet above mean sea level. There are also no enclosed bodies of water near the project site that could result in a seiche. Therefore, the project is not at risk of inundation due to a tsunami or seiche. Further, potential pollutants would be appropriately stored at the project site and would not be anticipated to be released in the unlikely event of project inundation. Impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

As discussed in X(b), there is no sustainable groundwater management plan applicable to the project. The RWQCB is responsible for the adoption and implementation of water quality control plans, issuance of discharge permits, and performs other functions in relation to regulating the region's water quality. The Water Quality Control Plan for the San Diego Basin (Basin Plan) is prepared by the RWQCB and defines the existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. The Basin Plan identifies the project site as within the Miramar Reservoir hydrologic area of the Peñasquitos hydrologic unit (906.10). As identified in X(a), downstream receiving waters listed as impaired on the Section 303(d) List include Carroll Canyon Creek (for copper, diazinon, indicator bacteria, lead, and zinc) and the San Diego Bay (for benthic community effects, cyfluthrin, pyrethroids, and toxicity). Runoff from the project site would be collected by the on-site storm drain and biofiltration systems, treated in accordance with the water quality regulations, and then discharged into the Carroll Canyon Creek tributary. The proposed project would be required to comply with applicable storm water quality standards during construction and operation. Conformance with the Basin Plan water quality objectives would be demonstrated through compliance with applicable regulations and implementation of construction and post-construction BMPs. Thus, the project would be consistent with the Basin Plan.

The project would comply with the existing NPDES permits, including the Construction General Permit and MS4 permit via compliance with the City's Stormwater Standards. Adherence to these permit conditions would ensure that that project does not obstruct implementation of the water quality control plan and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING				
– Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

The physical division of an established community typically refers to the construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. The project would be constructed within the existing El Camino Memorial Park property. The proposed roadway extension would extend from an existing internal roadway towards the expanded burial areas and would not encroach into any surrounding properties. Open space would be maintained surrounding the expansion sites and no features would be constructed outside of the existing property such that existing communities would be divided or access would be altered. The project would not physically divide an established community and no impacts would occur.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐

The City's Thresholds state that land use impacts may be significant if a project would be inconsistent or conflict with the environmental goals, objectives, or guidelines of a community or general plan, an adopted land use designation or intensity, or other adopted plans (including MHPA guidelines).

The project site has a land use designation of Cemetery and Open Space in the Mira Mesa Community Plan and is zoned AR-1-1 (Agricultural-Residential Zone). The project proposes an expansion of cemetery uses, which would be consistent with the Mira Mesa Community Plan land use designation and is allowed within the AR-1-1 zone with approval of a CUP. The existing CUP allows the cemetery uses on the other portions of the El Camino Memorial Park property and would be amended to allow cemetery uses within the project site. The project would not conflict with the adopted land use designation or intended intensity of the project site.

Noise compatibility guidelines in the Noise Element of the General Plan specify an exterior noise level of up to 75 dBA CNEL as appropriate for cemetery uses. Based on the project site's distance from roadways, it is not anticipated that the project would be inconsistent with this noise level. In addition, the adjacent industrial land uses are subject to property line limits in the San Diego Municipal Code, which limit on-site noise generation to an hourly average of 75 dBA. As described in X(e), the project site is within the 65 to 70 CNEL contours associated with MCAS Miramar, which is considered compatible with the proposed land use by the ALUCP. Therefore, it is assumed that the project is compatible with the exterior noise environment.

The General Plan Elements along with various plans such as the City's Biology Guidelines (2018), ESL Regulations, and adopted City MSCP Subarea Plan (1997) contain regulations, goals, policies, and strategies that are intended to avoid or mitigate environmental effects. In accordance with these

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

regulations, conditions enforcing adherence to MHPA Land Use Adjacency Guidelines to avoid impacts to coastal California gnatcatcher and the proposed habitat mitigation area would be included in the project permit. Further, with the mitigation measures identified in this document (BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, and HAZ-1), required adherence to the City's Storm Water Manual, including the implementation of a SWPPP and associated BMPs, and compliance with geotechnical design recommendations would avoid and mitigate potential environmental effects associated with the project. Impacts would be less than significant with mitigation incorporated.

XII. MINERAL RESOURCES

– Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

The City's Thresholds state that if a project is within a Mineral Resource Zone (MRZ) 2, significant impacts must be determined in consultation with City staff by considering if the site is large enough to allow for economically feasible aggregate mining or, if the site is too small for economically feasible resource extraction, if the project would preclude mining adjacent to or surrounding the site. Additionally, a project may result in a significant impact if an economically feasible mineral extraction operation is the site's current use, and the site is not exhausted.

According to the Conservation Element of the City's General Plan, the project site is classified as MRZ 2, which is defined as an area where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence. Given that the project site is under 10 acres in size and is surrounded by MHPA lands, it is unlikely that the site could be used as an economically feasible extraction operation. The project site is not currently being utilized for mineral extraction and is not zoned or planned for extractive uses. According to the Mira Mesa Community Plan EIR, mineral extraction would not occur in existing open spaces in the area and is limited to existing quarries associated with the 3Roots San Diego Master Plan and Stone Creek Master Plan areas. Therefore, development of the project would not result in the loss of availability of a known mineral resource and no impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Refer to XII(a) above. The project site is not currently used for mineral extraction and is not designated by appliable land use plans as a potential mineral resource recovery site. As such, no impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE				
– Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

The City's Thresholds identify that a significant impact would occur if:

- Traffic generated noise would result in exterior noise levels that exceed 65 dBA CNEL for residential and noise-sensitive land uses; 70 dBA CNEL for office, churches, and professional uses; and 75 dBA CNEL for commercial land uses. Residential uses must also not be exposed to noise levels resulting in interior noise levels exceeding 45 dBA CNEL.

- The project would generate operational noise levels at the property line exceeding the City's Noise Ordinance Standards.

- Temporary construction noise would exceed an hourly noise level (denoted as L_{EQ}) of 75 dBA L_{EQ} at a sensitive receptor. In addition, construction activity must comply with the hours and days when construction is allowed according to San Diego Municipal Code Section 59.5.0404, unless a permit states otherwise.

- Noise levels during the breeding season for the coastal California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird or western snowy plover would exceed 60 dBA or existing ambient noise level if above 60 dBA.

<u>Construction Equipment Noise</u>

The nearest noise-sensitive land use to the project site is the hotel approximately 2,500 feet to the west. At this distance, it is not anticipated that construction would result in noise levels exceeding ambient conditions. For example, a grader, which is typically the loudest piece of equipment associated with grading activities, is anticipated to generate an hourly noise level of 47.0 dBA L_{EQ} at 2,500 feet. Other construction activity is anticipated to be less intensive and result in lower noise levels than grading. In addition, construction would occur during the hours and days allowed by the Municipal Code, reducing the disturbance associated with construction. Therefore, project construction is not anticipated to exceed the construction noise limit of 75 dBA L_{EQ} at a noise sensitive land use and impacts would be less than significant.

As required by permit conditions, if occupied habitat is detected or presumed to occur adjacent to the project site during the breeding season, construction noise levels would be required to be reduced in accordance with MHPA regulations. Temporary increases in ambient noise levels from construction activity would not conflict with the applicable regulations and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Construction Traffic Noise

Construction would generate vehicular traffic in the form of worker vehicles and soil export trucks. Vehicles associated with project construction would utilize Carroll Canyon Road to access the site, which the San Diego Association of Governments' Traffic Forecast Information Center estimates to carry 15,000 average daily trips (ADT) in 2025. As a general rule, the doubling of noise sources would cause a perceptible increase in noise for the average human receptor. The addition of construction worker commute trips and 20 hauling trips throughout the construction period would not result in a doubling of existing traffic volumes or noise sources along Carroll Canyon Road. Therefore, noise impacts resulting from temporary increases in construction traffic would be less than significant.

Operational Noise

The City Noise Ordinance (San Diego Municipal Code Section 59.5.0401) sets limits for noise generation, as measured at the property line. For the project's agricultural land use and surrounding industrial land uses, the applicable noise standard would be 75 dBA L_{EQ}. As discussed in IV(f), MHPA Land Use Adjacency Guidelines provide guidelines for noise impacts to sensitive resources, including coastal California gnatcatchers anticipated to breed adjacent to the project site.

Operational noise associated with the project would primarily be generated by maintenance activities and visitor trips. Passive uses by visitors to the project site would not result in excessive noise levels and no new stationary sources of noise would be installed. Maintenance activities may require the use of landscaping equipment and minor tools. Use of the project site during operation would be limited and on-site activities are not anticipated to generate an average hourly noise level exceeding 60 dBA, such that conflicts with sensitive species in the MHPA would occur.

As discussed above, traffic volumes would generally need to double for a perceptible increase in traffic noise to occur. Based on the City's Trip Generation Manual rate of 5 trips/acre for cemetery land uses, the proposed 5.3 acres of cemetery expansion would add approximately 27 ADT to Carroll Canyon Road (see XVII(a)), which carries approximately 15,000 trips. Therefore, the project would not cause an increase in traffic noise that would expose off-site uses to substantial increases in traffic noise and impacts related to operational traffic noise would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

A significant vibration impact would occur if the project would result in construction-related groundborne vibration that exceeds the Caltrans criteria for continuous/frequent intermittent sources at human receptors or nearby buildings. The severe vibration annoyance criteria for human receptors is 0.4 inch per second peak particle velocity (PPV) and the industrial building damage criteria is 0.5 inch per second PPV. Vibration sensitive land uses typically include historic structures, certain manufacturing or research facilities, and other older structures constructed of weaker materials such as wood or brick.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. A possible source of vibration during grading activities would be a vibratory roller, which generates approximately 0.210 inch per second PPV at 25 feet. To

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

exceed the severe human annoyance threshold of 0.4 inch per second PPV, a vibratory roller would need to operate within 14 feet of a vibration sensitive land use.[2] Given that the nearest building to the project site is an industrial building located approximately 180 feet away from the Phase 1 grading area, the severe annoyance and building damage criteria would not be exceeded by the use of a vibratory roller. Therefore, the temporary use of a vibratory roller (and other potential equipment) would not result in excessive groundborne vibration and impacts would be less than significant.

Land uses that may generate substantial operational vibration include heavy industrial or mining operations that would require the ongoing use of vibratory equipment. While equipment is used at the project site for operational maintenance and burials, the equipment would not result in strongly perceptible vibration levels at vibration-sensitive land uses. Therefore, operational vibration impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

The project site is located within the 65 to 70 CNEL contours associated with MCAS Miramar. The City General Plan Noise Element specifies cemetery land uses are compatible with noise levels of up to 75 CNEL. Therefore, airport noise at the project site would not be excessive for the proposed land use. The project site is not within the noise contours for other airports in the region. Therefore, the project would not expose people residing or working in the area to excessive noise levels and impacts would be less than significant.

XIV. POPULATION AND HOUSING

– Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

The proposed project does not include housing or new employment opportunities that would directly induce population growth. During project construction, a small number of employees would be recruited from existing populations for short-term construction work. After construction is complete, the existing employees of the Memorial Park would service the new area.

The additional area that would be added to the Memorial Park would not result in a new public service that would indirectly induce population growth. The additional burial area would

[2] Equipment PPV = Reference PPV * $(25/D)^n$ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2013b.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

accommodate existing populations given that the current Memorial Park area is nearing capacity. The expanded area is expected to fill at approximately the same rate as the existing portion of the Memorial Park. In addition, burial area is not an infrastructure component that would facilitate the construction of new housing. Moreover, the project would not result in the extension of roads or other infrastructure that would indirectly induce substantial population growth by opening up new areas for development. The project would not induce substantial population growth and no impact would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The project site is currently undeveloped and does not include housing. Thus, the proposed project would not displace people or existing housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection	☐	☐	☒	☐

The City's Thresholds state that a project's consistency with the applicable community plan (in terms of number, size, and location of public service facilities) should first be evaluated when considering impacts related to public services. Typically, direct impacts could result from the construction of public service facilities needed to serve a project and indirect impacts could occur where a project constructs more than 75 dwelling units or 100,000 sf of non-residential building area.

The project is consistent with its land use designation in the Mira Mesa Community Plan and is located in a developed area where fire protection services are already provided. The project does not propose any dwelling units or 100,000 sf of non-residential building area that would result in increased demand for fire protection services. In addition, the new burial area is not anticipated to generate substantial increases in fire protection services compared to the existing area of El Camino Memorial Park.

The project would be constructed in accordance with applicable building and fire codes and would comply with City and Fire Department requirements. As part of the plan review process, the Fire Department has reviewed project plans for compliance with such requirements and their comments have been incorporated into the project design.

The project would not adversely affect existing levels of fire protection services to the area, substantially increase the need for new fire protection staff or new facilities, or require the construction of new or expanded fire protection facilities. Impacts to fire protection would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police protection;	☐	☐	☒	☐

The project site would function as an extension of the existing Memorial Park, which is located in a developed area where police protection services are already provided. The San Diego Police Department provides law enforcement services in the project area. The proposed expansion of burial area would not result in a new land use requiring increased levels of police protection services. The project would not adversely affect existing levels of police protection services in the area and would not require the construction of new or expanded governmental facilities. Impacts to police protection would be less than significant.

iii) Schools;	☐	☐	☐	☒

As discussed in XIV(a), the project would not result in direct or indirect population growth. Therefore, there would be no increase in demand for schools in the area and no impact would occur.

iv) Parks; or	☐	☐	☐	☒

The project involves an expansion of cemetery land and would not induce growth that would require alteration to existing parks or the construction of a new park. No impact would occur.

v) Other public facilities?	☐	☐	☐	☒

As discussed in XIV(a), no increase in population would occur with project implementation. The project would not adversely affect existing levels of facilities to the area and would not require the construction of new or expanded governmental facilities. No impact would occur.

XVI. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

The project would not result in increased population, as described in XIV(a). Therefore, the project is not anticipated to result in changes to the use of existing parks or recreational facilities and substantial deterioration of these facilities would not be accelerated. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

See XVI(a). The proposed project does not include growth requiring the construction or expansion of recreational facilities. Therefore, no impacts would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION				
a) Would the project or plan/policy conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?	☐	☐	☒	☐

Transportation plans and policies for the region include the City of San Diego Pedestrian Master Plan, General Plan Mobility Element, City of San Diego Bicycle Master Plan, SANDAG San Diego Regional Bike Plan, and SANDAG 2021 Regional Plan.

According to the City's Trip Generation Manual, cemeteries generate an average of 5 daily vehicle trips per acre. Based on the 5.3-acre project site, the project would generate approximately 27 ADT. For the purposes of this Initial Study, it is anticipated that the project would generate 27 ADT; however, it is anticipated that the rate of burials would not increase with the construction of the project. The addition of 27 ADT would be considered as a "Small Project", defined as generating less than 300 unadjusted driveway trips per the City's Transportation Study Manual (TSM) and would not result in a significant conflict with vehicle mobility in the City. Parking along the eastern side of the roadway extension is expected to provide sufficient parking for visitors to the expansion area. The sidewalks and new curb ramps along Carroll Canyon Road would be constructed in accordance with City standards and would not conflict with transportation plans or policies.

The Mira Mesa Community Plan indicates that planned transit, bicycle, and pedestrian facilities along Carroll Canyon Road will be implemented in the future. Specifically, Carroll Canyon Road is planned as a 4-Lane Major Roadway with a Class IV one-way cycle track and center-running transit guideway for a new Rapid Transit Line. There is an existing 102-foot-wide Irrevocable Offer to Dedicate within the project site for the future extension of Carroll Canyon Road (Mira Mesa PFFP Project T-5A). The City may seek to acquire additional right-of-way at the time the future Capital Improvement Program project for Carroll Canyon Road goes forward to accommodate the planned roadway, transit, and pedestrian facilities per the Mira Mesa Community Plan. Contiguous sidewalk generally exists along Carroll Canyon Road from the I-805 off ramp to Fenton Rd, except for approximately 2,500 feet on the north side of Carroll Canyon Road between the I-805 off ramp and Scranton Road, and approximately 500 feet on the north side of Carroll Canyon Road east of the project's entrance (Mino Drive). The project would construct a curb ramp at the easterly curb return for the existing driveway along Carroll Canyon Road (leading to Mino Drive), and curb, gutter, and 5-foot-wide sidewalk connection from the easterly curb return to join with the existing sidewalk to the east per current City standards. Class II bike lanes have been implemented on Carroll Canyon Road from the I-805 off ramp to Fenton Road and along Carroll Road between Fenton Road and Camino Santa Fe, east of the project site. Visitors to the project site may use these methods of transportation along Carroll Canyon Road as they are implemented. However, the project would not generate substantial trips such that these facilities would require increased capacity compared to that anticipated in the applicable plans to accommodate the project. In addition, the project would not preclude future implementation or improvement of transit, roadways, bicycle, or pedestrian facilities in the vicinity.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Although the project would lead to a slight increase in daily vehicle trips and may increase the use of transit, bicycle, and pedestrian facilities, the project would not conflict with plans or policies applicable to these transportation elements. Impacts would be less than significant.

b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual.	☐	☐	☒	☐

To satisfy the CEQA guidelines updated after the passage of Senate Bill (SB) 743, vehicle miles traveled (VMT) is considered as the metric for identifying the potential transportation (VMT) impacts of the proposed project. Public Resources Code Section 20199, enacted pursuant to SB 743, identifies VMT as an appropriate metric for measuring transportation impacts along with the elimination of auto delay/level of service for CEQA purposes statewide.

Thus, in compliance with SB 743, the project's potential impacts are assessed by conducting VMT analysis per the City's TSM. A project in the City that would generate less than 300 daily trips is considered a "Small Project" and is presumed to have a less than significant VMT impact.

The project would be expected to generate 27 ADT, which is below the City's screening threshold of 300 unadjusted daily driveway trips for "Small Projects". Therefore, the project screens out of further VMT analysis and VMT impacts would be less than significant.

c) Would the project or plan/policy substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

There would be no hazardous design features or incompatible uses introduced as a result of the project. The roadway elements of the project would be consistent with the City's Street Design Manual and emergency access standards and would not result in hazardous roadway conditions. The new burial areas would be compatible with surrounding land uses, which are either undeveloped or part of the existing cemetery. As such, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

d) Result in inadequate emergency access?	☐	☐	☒	☐

The project site would be accessed via Carroll Canyon Road from the existing El Camino Memorial Park entrance. The addition of project-related traffic would not cause a significant increase in congestion on local roadways and would not interfere with emergency access. The onsite roadway extension constructed by the project would be 28 feet wide and would accommodate emergency vehicles on the project site if needed. The project has been designed consistent with the City's emergency access standards. Additionally, the project has been reviewed by the Fire-Rescue Department to ensure proper circulation on and off the site for emergency services vehicles. The project would not result in inadequate emergency access and impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
– Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐

As detailed in V(b), a review of the NAHC Sacred Lands File yielded negative results. As documented in the Archaeological Resources Report Form for Phase 2 of the project, HELIX sent notification letters on April 3, 2023, to all contacts listed by the NAHC. As of the date of this report, no responses have been received. If responses are received, HELIX will forward them to the client. In addition, City staff invited interested tribes to consultation under Assembly Bill 52. The Notifications were distributed to the Iipay Nation of Santa Ysabel, the Jamul Indian Village and the San Pasqual Band of Mission Indians for consultation on September 14, 2023, for 30 days concluding on October 14, 2023. No letters requesting consultation were received within the 30-day time period.

While no tribal cultural resources have been identified within the project area, the presence of cultural resources within the project vicinity indicates that there is potential for buried tribal cultural resources to be uncovered during ground-disturbing activities within the project site. Impacts to these resources would be considered significant and monitoring by Native American representatives has been recommended for ground-disturbing activities. Mitigation measure CUL-1 would require monitoring in accordance with the City's standard requirements and impacts would be reduced to a less than significant level.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Refer to XVIII(a) above. Impacts would be less than significant with implementation of mitigation measure CUL-1.

XIX. UTILITIES AND SERVICE SYSTEMS				
– Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would not contribute new flows to the local wastewater system and would not require service by electric, natural gas, or telecommunication infrastructure. Therefore, no impacts related to wastewater, natural gas, electric power, or telecommunication infrastructure would occur. Impacts would be less than significant.

Recycled and potable water service is provided by the City to the existing Memorial Park property and would be extended to serve new landscaping and habitat created by the project. Construction of the project would not substantially increase the demand for water such that expanded public facilities would be required and impacts would be less than significant. As discussed in Section X, on-site stormwater treatment would be installed and no substantial increase in stormwater flows would occur. No new public stormwater drainage facilities would be required.

Environmental impacts related to the installation of water service extensions and the on-site stormwater treatment system have been analyzed throughout this Initial Study. No relocation or construction of new public facilities would be required and impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

The City's Thresholds state that a significant impact related to water supply may occur if a project would use excessive amounts of potable water (i.e., a golf course or certain industrial uses) or would install predominantly non-drought resistant landscaping. The project does not meet the criteria requiring a water supply assessment in accordance with SB 610 or 221. The existing Memorial Park receives water service from the City, primarily for the purposes of landscaping. The project would involve the installation of approximately 98,000 sf of landscaped area, all of which would be irrigated by recycled water. The project would not require excessive amounts of potable water and would not install predominantly non-drought resistant landscaping.

As required under the Urban Water Management Planning Act and the California Water Code, the City prepared the 2020 UWMP that examines the reliability of the water supply during normal, dry, and multiple drought years and provides a foundation for water supply planning. The analysis conducted for the UWMP assumed a five-year drought beginning in 2021 and concluded that the combination of wholesale water and local water supplies would be sufficient to meet water demands. Further, to formulate the forecast demands that are used in determining the sufficiency of water supply in future years, the UWMP relies in part on land use assumptions in accordance with land use plans. The proposed project is consistent with the City's General Plan and the Mira Mesa Community Plan. As such, adequate water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's demand in addition to the provider's existing commitments?	☐	☐	☐	☒

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

As the project does not involve structures or plumbing, the project would not contribute new wastewater flows to the City's treatment system. No impact would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

The City's thresholds state that construction/demolition/renovation projects meeting or exceeding the following thresholds are considered to have potentially significant impact based on solid waste generation estimates and require the preparation of a waste management plan:

Cumulative Impacts

- Projects that include the construction, demolition, and/or renovation of 40,000 square feet or more of building space may generate approximately 60 tons of waste or more, and are considered to have cumulative impacts on solid waste facilities.

Direct Impacts

- Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more and are considered to have direct impacts on solid waste facilities.

The project does not propose the construction, demolition, or renovation of building space and does not require the preparation of a waste management plan. The expansion area would produce similar waste to the existing cemetery use, which generates solid waste related to maintenance and burial activities. Quantities of solid waste generated by operation of the new burial area would not substantially increase compared to the existing cemetery and would not exceed local standards for waste generation.

The majority of the waste generated during project construction would include vegetation material. Grading on-site would result in soil movement but would only require the export of 305 cy of soil material. Vegetation and soils removed from the project site during construction would be diverted from landfills and would be disposed of at the appropriate organic waste and soil storage facilities, respectively.

The project would not generate substantial quantities of solid waste during construction or operation and would not exceed State or local standards, exceed local infrastructure capacity, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Refer to XX(d), above. The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

XX. WILDFIRE

– If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

See IX(f). According to the Mira Mesa Community Plan, I-15 and I-805 are emergency evacuation routes in the project vicinity. I-805 is located approximately one mile west of the project site and would provide the primary emergency evacuation route from the site. The project does not propose population growth or other components that would interfere with effective emergency response or evacuation in the project vicinity. Impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☒	☐

The project site is located within an identified VHFHSZ. However, grading during project construction would not substantially alter on-site topography such that an increased risk of wildfire spread would be present in the project area. The project would not introduce components, either during construction or operation, which would result in increased risk of wildfires. Further, the project would not construct habitable structures that would result in residents being exposed to wildfire risks. Therefore, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

The project would construct new roadway infrastructure within the project site to provide access to the expanded burial area. The proposed roadway construction would comply with the California Fire Code and has been reviewed by the City's Fire-Rescue Department. No fuel breaks, emergency water sources, or power lines would be installed by the project. Therefore, the installation and maintenance of project infrastructure would not exacerbate fire risks. Other temporary and ongoing impacts to the environment are addressed in the applicable sections of this Initial Study and would be less than significant with implementation of appropriate mitigation. Impacts related to installation and maintenance of infrastructure would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Grading proposed for the project would occur in accordance with applicable regulations and the recommendations provided by the project's geotechnical report. Therefore, no change to the potential stability of slopes would occur due to the project. In addition, the project does not propose the construction of structures or other facilities that would place people or structures within a risk area for indirect wildfire effects. The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of biological resources, cultural resources, and tribal cultural resources**.** The project would not substantially degrade the quality of the environment, cause fish or wildlife populations to drop below self-sustaining levels or threaten to eliminate a plant or animal community. The project has the potential to cause direct and indirect impacts to sensitive vegetation communities and habitat for sensitive animal species. Impacts would be reduced below a level of significance with implementation of mitigation measures BIO-1, BIO-2, BIO-3, and BIO-4. Additionally, permit conditions would ensure consistency with the City's MHPA Land Use Adjacency Guidelines and maintenance of the proposed mitigation area.

The project is not expected to impact resources related to major periods of California history or prehistory. Based on the cultural sensitivity of the project region, however, the project would have the potential to impact unknown subsurface cultural and tribal cultural resources. With implementation of mitigation measure CUL-1, impacts to cultural resources and tribal cultural resources would be less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a cumulative impact. Related projects considered to have the potential of creating cumulative impacts

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project. The project would occur within an undeveloped portion of a property operating as an existing cemetery in a developed area.

As discussed in Section III, criteria pollutant and precursor pollutant emissions generated during project construction and operation are not anticipated to exceed the SDAPCD screening thresholds, and therefore would not be cumulatively considerable. Similarly, the project would have a less than significant impact in relation to GHG, which is inherently discussed in terms of cumulative impacts. The generation of 27 new vehicle trips would not result in cumulatively considerable impacts related to pollutant emissions, GHG emissions, or VMT.

Impacts related to biological resources would be mitigated to a less than significant level and a boundary line adjustment would add lands to the MHPA to compensate for the removal of other MHPA lands from the preserve. Therefore, the project would not result in cumulatively considerable impacts to sensitive animal species or habitats.

While no known cultural resources are known to occur within the project area, impacts related to cultural and tribal cultural resources were conservatively determined to be potentially significant. With implementation of CUL-1, impacts related to cultural and tribal cultural resources would be less than significant, and the project would not result in a cumulatively considerable impact to cultural resources.

Implementation of the SMP identified in mitigation measure HAZ-1 would ensure contaminated soils would be disposed of in accordance with the applicable regulations and would not contaminate other soils on or off site, resulting in cumulative impacts related to hazardous materials within soils.

The project would be consistent with the land use and zoning designations for the project site, which allow the cemetery land use. The project components would not induce growth in the project vicinity and would accommodate the ongoing rate of burials with new burial spaces. Therefore, cumulatively considerable impacts as a result of population growth are not anticipated to occur as a result of the proposed project.

Other future projects within the surrounding area would be required to comply with applicable local, state, and federal regulations to reduce potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts. Cumulative impacts related to implementation of the project would be less than significant with implementation of the noted mitigation measures.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

The air quality analysis provided in III(c) identified that the project would have less than significant impacts in relation to air quality health concerns given the distance between the project site and sensitive receptors. The project would not generate substantial noise during construction or operation that would have adverse effects on human being. With implementation of mitigation measure HAZ-1, potential soil contamination would be handled and disposed of such that it would

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

not represent a human health hazard. Other issue areas that could potentially create substantial adverse effects on human beings such as risk of fire or floods were determined to be less than significant. Thus, as analyzed throughout this Initial Study Checklist, no substantial adverse effects on human beings, either indirectly or directly, would occur because of project implementation and therefore, impacts would be less than significant.

Initial Study Checklist
REFERENCES

I. Aesthetics

☒ City of San Diego General Plan
☒ Community Plan: Mira Mesa Community Plan
☒ Other: California State Scenic Highway Mapping System

II. Agricultural and Forest Resources

☐ City of San Diego General Plan
☐ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
☐ Site Specific Report:
☒ Other:
California Department of Conservation. 2018. California Important Farmland Finder.
Mira Mesa Community Plan Update EIR.

III. Air Quality

☒ City of San Diego General Plan
☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
☐ Regional Air Quality Strategies (RAQS) - APCD
☐ Site Specific Report:
☒ Other:
2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County.

IV. Biology

☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
☒ Community Plan – Mira Mesa Community Plan
☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001
☒ City of San Diego Land Development Code Biology Guidelines
☒ Site Specific Report:
El Camino Memorial Park Secret Canyon Project Biological Technical Report, prepared by HELIX Environmental Planning, Inc., September 2024.

V. Cultural Resources (includes Historical Resources and Built Environment)

☐ City of San Diego Historical Resources Guidelines
☐ City of San Diego Archaeology Library
☐ Historical Resources Board List
☐ Community Historical Survey

☒ Site Specific Report:

El Camino Memorial Park Secret Canyon Project Archaeological Resources Report Form, prepared by HELIX Environmental Planning, Inc., August 2021.

El Camino Memorial Park Secret Canyon Project Phase 2 Archaeological Resources Report Form, prepared by HELIX Environmental Planning, Inc., April 2023.

VI. Geology/Soils

☒ City of San Diego Seismic Safety Study

☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975

☒ Site Specific Report:

Geotechnical Soilutions, Geological and Geotechnical Investigation For Proposed Expansion Project Secret Canyon published April 25, 2017, amended August 30, 2021.

VII. Greenhouse Gas Emissions

☒ Site Specific Report:

Climate Action Plan Consistency Checklist.

VIII. Hazards and Hazardous Materials

☐ San Diego County Hazardous Materials Environmental Assessment Listing

☐ San Diego County Hazardous Materials Management Division

☐ FAA Determination

☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized

☒ Airport Land Use Compatibility Plan – MCAS Miramar, Amended 2011

☐ Site Specific Report:

☒ Other:

City of San Diego Fire-Rescue Department. Very High Fire Hazard Severity Zone Map.

County of San Diego Emergency Operations Plan, approved August 30, 2022.

County of San Diego, Multi-Jurisdictional Hazard Mitigation Plan. 2018.

San Diego County Regional Airport Authority ALUCP Mapping Tool, accessed April 27, 2023.

IX. Hydrology/Drainage

☐ Flood Insurance Rate Map (FIRM)

☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map

☒ Clean Water Act Section 303(b) list, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/#impaired

☒ Site Specific Report:

Hydrology Study for El Camino Memorial Park Secret Canyon Expansion, prepared by Kreuzer Consulting Group, December 2021.

El Camino Memorial Park – Secret Canyon Floodplain Analysis/CLOMR Requirements, prepared by PACE Advanced Water Engineering, May 18, 2021.

☒ Other:
2020 Urban Water Management Plan, prepared by City of San Diego Public Utilities Department, June 2021.

X. Land Use and Planning

☒ City of San Diego General Plan
☒ Community Plan: Mira Mesa
☒ Airport Land Use Compatibility Plan: MCAS Miramar, Amended 2011
☒ City of San Diego Zoning Maps
☐ FAA Determination:
☐ Other Plans:
San Diego County Regional Airport Authority ALUCP Mapping Tool, accessed April 27, 2023.

XI. Mineral Resources

☒ City of San Diego General Plan
☐ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
☒ City of San Diego General Plan: Conservation Element
☐ Site Specific Report:
☒ Other: Mira Mesa Community Plan EIR

XII. Noise

☒ City of San Diego General Plan
☐ Community Plan:
☐ San Diego International Airport - Lindbergh Field CNEL Maps
☐ Brown Field Airport Master Plan CNEL Maps
☐ Montgomery Field CNEL Maps
☒ San Diego Association of Governments – Traffic Forecast Information Center Series 14
☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☐ Site Specific Reports:
☒ Other:
U.S. Department of Transportation Roadway Construction Noise Model.
MCAS Miramar ALUCP CNEL Maps.
San Diego County Regional Airport Authority ALUCP Mapping Tool, accessed April 27, 2023.

XIII. Paleontological Resources

☒ City of San Diego Paleontological Guidelines
☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977

☐ Site Specific Report:

XIV. Population / Housing

☐ City of San Diego General Plan
☐ Community Plan
☐ Series 11/Series 12 Population Forecasts, SANDAG
☐ Other:

XV. Public Services

☐ City of San Diego General Plan
☒ Community Plan: Mira Mesa

XVI. Recreational Resources

☐ City of San Diego General Plan
☐ Community Plan
☐ Department of Park and Recreation
☐ City of San Diego - San Diego Regional Bicycling Map
☐ Additional Resources:

XVII. Transportation / Circulation

☒ City of San Diego General Plan
☒ Community Plan: Mira Mesa
☐ San Diego Association of Governments – Traffic Forecast Information Center Series 14
☒ Street Design Manual. March 2017 Edition.
☐ Site Specific Report:
☒ Other:

Transportation Study Manual. Revised September 19, 2022.
Land Development Code Trip Generation Manual. Revised May 2003.

XVIII. Utilities

☐ Site Specific Report:
☒ Other:

2020 Urban Water Management Plan, prepared by City of San Diego Public Utilities Department, June 2021.

XIX. Water Conservation

☐ Sunset Magazine, *New Western Garden Book*, Rev. ed. Menlo Park, CA: Sunset Magazine

XX. Water Quality

☒ Clean Water Act Section 303(b) list, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/#impaired .
☒ Site Specific Report:

Hydrology Study for El Camino Memorial Park Secret Canyon Expansion, prepared by Kreuzer Consulting Group, December 2021.

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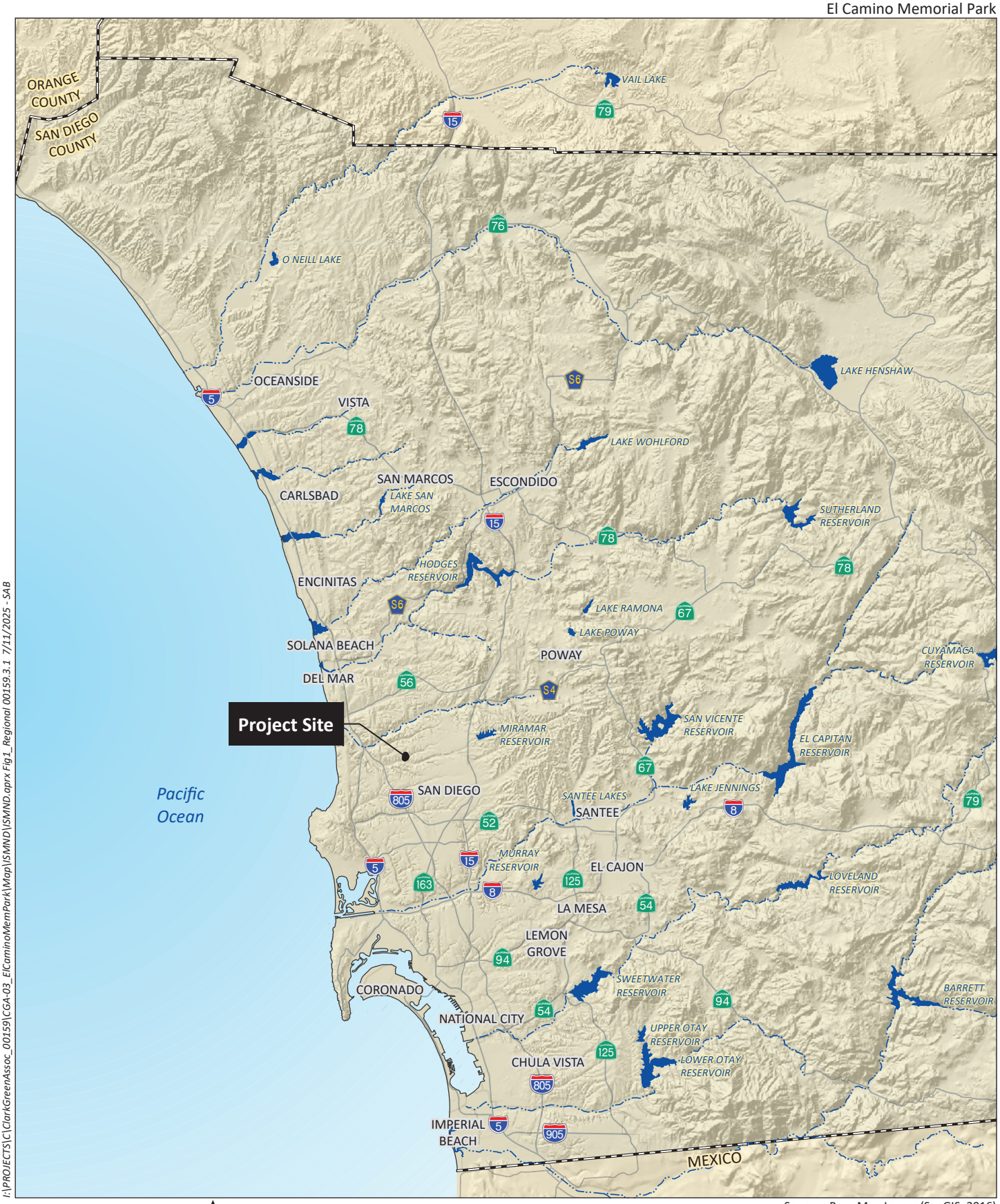
Figures



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Source: Base Map Layers (SanGIS, 2016)

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Regional Location

Figure 1

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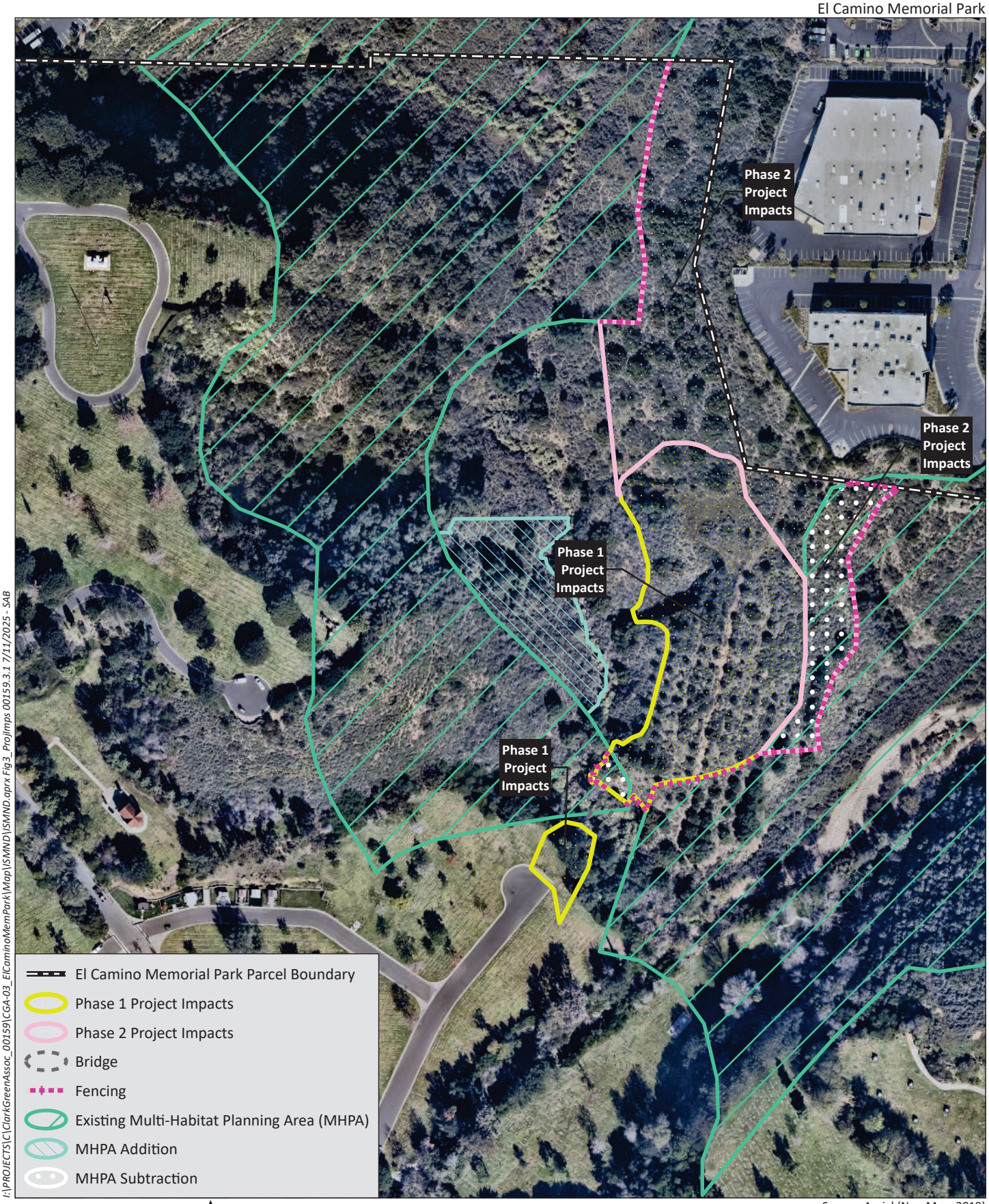
Source: Aerial (SanGIS, 2019)

HELIX Environmental Planning

Aerial Photograph

Figure 2



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Source: Aerial (NearMap, 2019)

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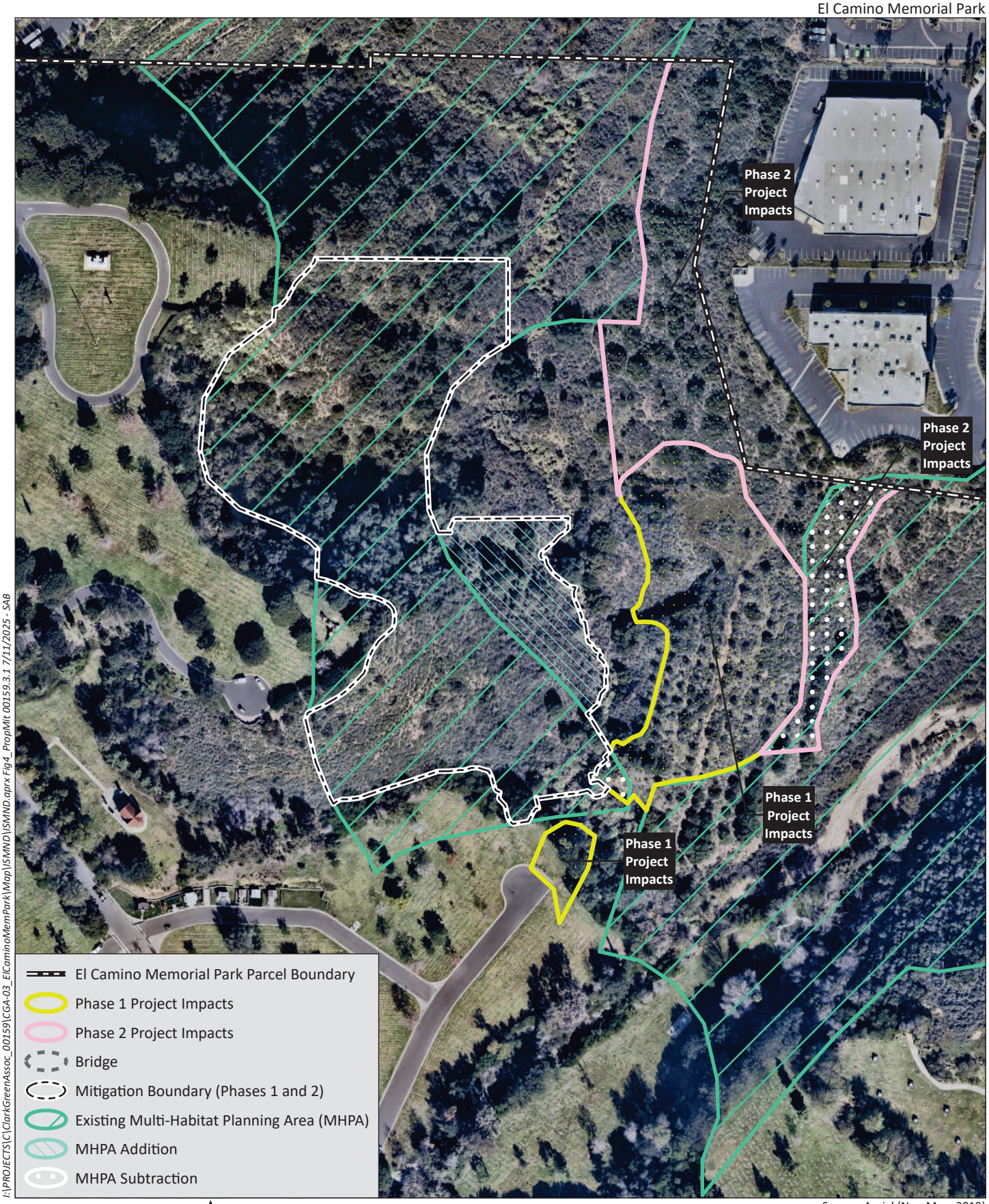
Proposed Project Impacts

Figure 3



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Source: Aerial (NearMap, 2019)

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Proposed Mitigation Area

Figure 4