THE CITY OF SAN DIEGO

ADDENDUM

Project No. PRJ-1109252
Addendum to EIR No. 92-0199
SCH No. 1992071032

SUBJECT: **7957 Princess Street**: The project proposes a Site Development Permit (SDP) for a public coastal accessway path located on a sensitive coastal bluff that would lead to the beach. The accessway is located within an existing coastal access easement at 7957 Princess Street. The 0.027-acre easement is adjacent to a single-family residence within the Residential Single Dwelling Unit (RS-1-7) Base Zone, Coastal (Appealable) Overlay Zone and Coastal First Public Roadway Overlay Zones and is designated Low-Density Residential (5-9 dwelling units/acre) and Dedicated Open Space Park within the La Jolla Community Plan Area. (LEGAL DESCRIPTION: A five-foot-wide strip over that portion of Lot 10 of Block 3 of Amalfi Subdivision, in the City of San Diego, County of San Diego, State of California, according to the Map thereof No. 959, filed in the Office of the County of San Diego Recorder of San Diego County, September 25, 1905)
APPLICANT: Pam Heatherington, Environmental Center of San Diego.

I. SUMMARY OF ORIGINAL PROJECT

A Program Environmental Impact Report (PEIR) No. 92-0199 (SCH No.92071032) was certified on July 12, 1993 for the La Jolla and Pacific Beach Community Plan and Local Coastal Program Land Use Plan Updates. PEIR No. 92-0199 evaluated a comprehensive update to the adopted La Jolla and Pacific Beach Community Plans. These Plan Updates consolidated policy statements for community growth and development over 20 years. They also addressed coastal issues to protect and enhance the area's coastal resources, with applicable policies and recommendations proposed in various elements of the Updates. The updated La Jolla Community Plan evaluated the goals, policies and recommendations that were identified in all of the planning documents affecting the community. These documents included the following: the La Jolla Community Plan (adopted in 1967, amended in 1976 and 1988, and in effect in the Coastal Zone), the La Jolla Shores Precise Plan (adopted in 1972 and in effect in the Coastal Zone), the La Jolla-La Jolla Shores Local Coastal Program (adopted in 1982, and certified in 1983), the Fay Avenue Plan (adopted in 1980) and the La Jolla Community Plan (adopted in 1995 for areas outside the Coastal Zone only). The La Jolla Community Plan Update synthesized the policies and recommendations from these documents into one community plan for all of La Jolla. PEIR No. 92-0199 was prepared as a combination document, since the community plans for both La Jolla and Pacific Beach were being processed simultaneously and with similar issues and environmental impacts.

Although the planning areas were virtually built out and the Plans both emphasized preservation of sensitive resources, the EIR concluded that adoption of these Plans would potentially contribute to significant impacts associated with traffic and circulation (direct and cumulative), air quality (direct and cumulative), geology and soils, biology, cultural resources, hydrology and water quality (direct and cumulative) and noise (direct and cumulative), primarily created by residential development and infill. PEIR No. 92-0199 concluded that some of these impacts could likely be mitigated during future site-specific development project reviews. However, these impacts were determined to remain significant and unavoidable

Although PEIR No. 92-0199 included both La Jolla and Pacific Beach community planning areas, for the purposes of this analysis, only the La Jolla community planning area will be discussed in detail, due to the location of the proposed project within the La Jolla Community Plan area.

II. SUMMARY OF PROPOSED PROJECT

The project proposes a Site Development Permit (SDP) for a public coastal accessway path located on a sensitive coastal bluff that would lead to the beach within an existing coastal access easement at 7957 Princess Street. The pathway would include a five-foot wide stair structure made primarily of wood components. The structure would begin at a high point finished elevation of approximately 46 feet above mean sea level and lead down to a viewing platform at approximately 23 feet above mean sea level before continuing to the water's edge. Wood components of the structure would be sourced with pressure-treated douglas fir, and include planks for steps and platforms, stringers, guard rails, posts, and pressure-treated douglas fir retaining walls. The final approach to the beach would be a ship ladder design, anchored into the rocks at the base of the cliff and allowing for the water to flow through the structure during high tide events.

Other components include a solid stainless steel cable guide system and a wood bench. The project would also include interpretive signage including Kumeyaay History, State Marine Reserve rules, enter at your own risk signage, and a regulations sign including no alcohol, glass containers, smoking, littering, disturbing noise, beach fires, dogs, or overnight sleeping, camping, or parking per the municipal code. The project also includes grading for erosion control and revegetation along the edges of the trail with native plants.

Construction duration would be 12-18 months. Larger construction materials would be stored and fabricated offsite and smaller material would be staged on the easement. Anticipated construction activities include hand digging the foundation holes, which may include a gas generator and handheld power auger, standard power tools to assist with hammering nails, cutting wood and other construction uses.

The project requires a Process Three Site Development Permit (SDP) for development on Environmentally Sensitive Lands (ESL), specifically Sensitive Coastal Bluffs. Although the site also contains ESL in the form of a Special Flood Hazard Area (Zone VE), the project complies with San Diego Municipal Code Sections 143.0145 and 143.0146 and therefore does not

require an SDP for the Special Flood Hazard Area. However, an SDP is required for development on the Sensitive Coastal Bluffs because the project does not qualify for the exemption under San Diego Municipal Code Section 143.110(c)(1). .

III. ENVIRONMENTAL SETTING

The site is located at 7957 Princess Street, northwest of the intersection of Spindrift Drive and Princess Street, where Princess Street terminates, on the coastal bluff. This section of Princess Street includes a "Dead End" sign and a "No Parking Any Time" sign. The 0.027-acre easement is adjacent to an existing single-family residence and is in the Residential Single Dwelling Unit (RS-1-7) Base Zone, Coastal (Appealable) Overlay Zone and Coastal First Public Roadway Overlay Zones and is designated Low-Density Residential (5-9 dwelling units/acre) and Dedicated Open Space Park within the La Jolla Community Plan Area.
The site is located within Environmentally Sensitive Lands (Sensitive Coastal Bluff, Special Flood Hazard Zone VE). The proposed pathway would be built on the coastal bluff face and Special Flood Hazard Area Zone VE.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the La Jolla and Pacific Beach Community Plan and Local Coastal Program Land Use Plan Updates Program Environmental Impact Report (PEIR) No. 92-0199/SCH No. 92071032. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous environmental document;

    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the EIR relative to the project. An overview of the project's impacts in relation to the previously certified La Jolla and Pacific Beach Community Plan and Local Coastal Program Land Use Plan Updates EIR (PEIR No. 92-0199) is provided in Table 1, Impact Assessment Summary. The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to PEIR No. 92-0199.

Table 1
Impact Assessment Summary

Environmental Issues	CPUs Final PEIR Finding Analysis	CPUs Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Traffic and Circulation	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Air Quality	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Geology	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Biology	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant
Cultural Resources	Significant and Unavoidable	Yes	No new impacts	Yes	Less than Significant with Mitigation
Hydrology/Water Quality	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant

Table 1 Impact Assessment Summary					
Environmental Issues	CPUs Final PEIR Finding Analysis	CPUs Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Noise	Significant and Unavoidable	Yes	No new impacts	No	Less than Significant

Traffic and Circulation

PEIR No. 92-0199

The La Jolla and Pacific Beach Community Plan and Local Coastal Program Land Use Plan Updates EIR (PEIR No. 92-0199) evaluated transportation-related impacts of the La Jolla Community Plan Update (CPU). According to the travel forecast, eight roadway segments within La Jolla were operating in excess of their design capacities. It was forecasted that with roadway improvements, upon community buildout of La Jolla, 14 roadway segments would operate in excess of their design capacities. The travel forecast found that two intersections within La Jolla currently operate with a level of service (LOS) lower (or worse) than C. Upon buildout of these communities, the forecast study projected LOS to be worse than C at four La Jolla intersections with existing intersection configurations.

PEIR No. 92-0199 concluded that implementation of the La Jolla CPU would result in direct and cumulative impacts to traffic circulation within this community, in relation to the capacity of the roadway systems. The forecasted increases in traffic volumes and levels of service for community roadways, for the large part, were attributed to overall regional growth and increased tourism.

PEIR No. 92-0199 include a mitigation measures, which states that the City shall not widen existing streets, or construct major roadways into La Jolla, which would result in an increase in existing traffic volumes into the community. The mitigation measures specify that improvements to La Jolla's street system shall be made in a manner that facilitates traffic circulation without disruption of the community character or existing patterns of development. The mitigation measures also included recommendations intended to relieve traffic congestion within the Village area and enhance streetscapes. PEIR No. 92-0199 determined that implementation of these mitigation measures would partially reduce impacts to traffic and circulation, but not to a level below significance. Impacts were determined to be significant and unavoidable.

Project

Since the certification of the PEIR, the metric for determining significant transportation impacts has been changed and Vehicle Miles Traveled (VMT) is now the primary metric for determining significance of transportation impacts pursuant to Senate Bill (SB) 743, which became effective July 1, 2020. Additionally, since the certification of the EIR and adoption of the Community Plan, the City of San Diego adopted a new threshold of significance for transportation VMT impacts under CEQA, and uniform development regulations referred to as the Mobility Choices Regulations San Diego Municipal Code Section 143.1101 together with a Final Program Environmental Impact Report, SCH No. 2019060003 (City of San Diego, 2020).

Consistent with the Mobility Choices regulations and the City of San Diego Transportation Study Manual (City of San Diego, 2022), the CEQA significance determination for transportation impacts associated with the project is based on the VMT metric. The proposed coastal public access project is presumed to have less than significant VMT impact as a locally serving public facility. No mitigation is required.

The project would improve an existing public access easement and would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, because the project does not propose any improvements that would affect these transportation systems. T Additionally, the project does not propose any driveway, street, or intersection improvements and would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. The project would result in public access to the beach and is compatible with surrounding residential uses. This section of Princess Street terminates at the proposed public accessway. However, it includes a "Dead End" sign and a "No Parking Any Time" sign in the existing condition. Additionally, the project is not required to implement any improvements t that would result in inadequate emergency access. Impacts would be less than significant. No mitigation is required.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the PEIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Air Quality

PEIR No. 92-0199

PEIR No. 92-0199 determined that implementation of the land use plan set forth within the proposed La Jolla CPU would result in direct impacts on the region's ability to attain federal and state air quality standards. Motor vehicle emissions would also incrementally affect air quality within the San Diego Air Basin as development occurs over time, resulting in cumulative impacts. Forecasted increases in average daily traffic and levels of service on community roadway, were for the large part, attributed to overall regional growth and an increase in tourism.

PEIR No. 92-0199 include a mitigation measures consisting of goals and recommendations relating to the 1992 Regional Air Quality Strategy (RAQS) to minimize direct and cumulative impacts to the region's air quality, including: Reducing traffic congestion within the communities by increasing the efficiency of public transit, promoting the use of a year-round shuttle service as an alternative form of transportation, creating safe and useful pedestrian and bicycle pathways, and reducing the impact of visitor parking in those areas closest to the beach and bay through a program of incentives. The EIR concludes that implementation of these mitigation measures would partially reduce impacts to air quality but not to a level of below significance.

Project

The project would be consistent with the community plan land use designation of Low-Density Residential (5-9 dwelling units/acre) and Dedicated Open Space Park because the project proposes

the improvement of a public access easement to the Open Space Park. Therefore, the project would be consistent at a sub-regional level with the underlying growth forecasts in the RAQS and would not obstruct implementation of the RAQS.

Short-Term (Construction) Emissions

Construction-related activities would be temporary, short-term sources of air emissions. Sources of construction-related air emissions include fugitive dust from grading activities; construction equipment exhaust; construction-related trips by workers, delivery trucks, and material-hauling trucks; and construction-related power consumption. Construction operations would include standard measures as required by City of San Diego grading permit to limit potential air quality impacts. Therefore, impacts associated with fugitive dust would be considered less than significant and would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, no impacts would occur.

Long-Term (Operational) Emissions

Long-term air emission impacts are those associated with stationary sources and mobile sources related to any change caused by a project. The project would produce minimal stationary source emissions as a public accessway. The project is compatible with the surrounding development and is permitted by the community plan and zone designation. As discussed above, the proposed coastal public access project is a locally serving public facility and is presumed to have less than significant VMT impact. As such, mobile source operation emissions would be less than significant. Based on the public accessway use, project emissions over the long-term are not anticipated to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant.

Typical long-term operational characteristics of a public accessway are not associated with the creation of such odors nor anticipated to generate odors affecting a substantial number of people. Therefore, project operations would result in no impact related to odors.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Geology

PEIR No. 92-0199

PEIR No. 92-0199 states that future residential development or residential/commercial redevelopment expected to occur throughout La Jolla, may be located within one, or a combination of Hazard Category Zones with the following features or phenomenon: confirmed, highly suspected, or conjectured land slide potential; slide-prone Ardath scale rock formation; relatively high liquefaction potential; generally unstable coastal bluffs; unstable and unfavorable bedding

planes;·and rapid erosion potential. Also, project sites located within 500 feet of an active fault, such as Rose Canyon Fault, or potentially active faults may have potentially significant geologic/geotechnical impacts. PEIR No. 92-0199 states that projects that are in these areas would require geotechnical surveys and studies to be conducted prior to issuance of any City permits. In most cases, geologic hazards can be alleviated by grading. For hazards associated with faults, building setbacks were generally considered as adequate mitigation. PEIR No. 92-0199 determined that implementation of the La Jolla CPU could result in significant direct and indirect impacts to the geological makeup of future project sites within La Jolla.

PEIR No. 92-0199 includes mitigation measures recommending specific hillside and coastal bluff development guidelines to alleviate potential geologic hazards in those areas. The mitigation measures also state that detailed mitigation measures would be formulated during the environmental review of site-specific projects. Impacts were determined to remain significant after mitigation.

Project

A project-specific Preliminary Geotechnical Investigation (Geotechnical Exploration, Inc., September 2023) was prepared for the project and reviewed and accepted by City Geology Staff. A review of the City of San Diego Seismic Safety Study indicates that the site is located in a low to moderate risk geologic hazard area, designated as Category 43. Category 43 is identified as "Generally unstable" with "Unfavorable bedding plains" and "local high erosion." Per the geotechnical report, the Point Loma Formation materials are considered very stable and the "Unfavorable bedding plains" and "local high erosion" portion of the descriptions do not apply to the easement area. A slope stability analysis was conducted for the site. It was determined that the site would be adequately stable, and the proposed construction would not adversely affect the stability of the coastal bluff or adjacent properties.

A minor unnamed fault is mapped south/southwest of the property. This fault and other similar faults were considered to be inactive and the site is not considered to have an unfavorable geologic structure. Sea caves were observed in the lower portion of the bluff. The sea caves were considered stable, have been present for many years, and are formed in the erosion resistant sandstone material of the Point Loma Formation. Additionally, no faults are mapped on the project site. As such, the project would result in no impacts related to rupture of a known earthquake fault.

The site, like most of southern California, is located in a seismically active area and regional faulting is present in San Diego County. The potential for strong ground shaking from earthquakes on active southern California faults and active faults in northwestern Mexico should be anticipated at the site. Implementation of the recommendations presented in the Geotechnical Investigation, and proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential impacts related to earthquakes would be less than significant.

Based upon the geologic reconnaissance and review of the geologic maps, there are no known or suspected ancient landslides located on the site. The site does not have a potential for soil liquefaction or soil strength loss to occur due to a seismic event. Based on the results of the Geotechnical Investigation, the site is underlain by stable formational materials, and is suited for the

proposed coastal access trail and associated improvements. Implementation of the recommendations presented in the Geotechnical Investigation, and proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential impacts related to geologic hazards would be less than significant.

The project site contains coastal bluffs but is consistent with the mitigation measure from the PEIR. The mitigation measure prohibits coastal bluff development on or beyond the bluff face except for public access stairways and ramps leading to beaches and since the project only proposes public access to the beach it is consistent None of the other mitigation measures apply to this project.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Biology

PEIR No. 92-0199

PEIR No. 92-0199 states that La Jolla contains many sensitive biological resources throughout its canyon, hillside and creek bed areas, which form the core of its open space systems. Biological habitats include coastal sage scrub, maritime succulent scrub, coastal bluff scrub, coastal mixed chaparral, riparian scrub, coastal salt marsh, coastal brackish marsh, and freshwater marsh.

PEIR No. 92-0199 determined that future development and redevelopment to take place within La Jolla could occur adjacent to sensitive biological resources found on hillside and canyon areas. Residential construction could occur along the edges of open spaces systems and open space easements, thus encroaching upon valuable habitat areas and potential wildlife linkages/corridors. PEIR No. 92-0199 determined that implementation of the La Jolla CPU could result in both direct and indirect impacts to biological resources within community open space systems, creek beds and shoreline areas. Development of future public utility and roadway improvements as recommended by the City could potentially impact valuable habitat within these communities as well.

PEIR No. 92-0199 includes mitigation measures consisting of policies and recommendations to minimize direct and indirect impacts to sensitive biological resources, potentially created through implementation of the La Jolla CPU. The mitigation measures also state that detailed mitigation or alternatives for impacts to biology related to residential, public utility and other projects, would be formulated during subsequent environmental review for those projects. Impacts were determined to remain significant after mitigation.

Project

A project-specific Biological Resources Analysis (Hamilton Biological Inc., June 2025) and Rocky Intertidal Marine Biological Resources Assessment and Public Use Impacts report (Coastal Resources Management, Inc., June 2025) were prepared.

Existing literature and historical databases for available biological resources information and records of sensitive biological resources were reviewed within 2 miles of the project site and public use impacts were studied within a study area consisting of a 100-meter wide band, centered at the base of the proposed trail, extending to the low tide zone. Terrestrial resources were evaluated on the project site itself, and within a "wider study area" consisting of the project site plus the adjacent shoreline and coastal waters within 100 meters. Additionally, biological reconnaissance surveys were conducted for terrestrial resources on in July 2018, May 2022, and July 2023. The intertidal reconnaissance surveys occurred in June 2022 and January 2025.

The project site, covering approximately 800 square feet (0.02 acre) lies within a residential yard that is currently gated, where fill dirt was placed in the past and vegetated with non-native landscape plants. Small numbers of three widespread native plant species remain on the project site, but the 0.02 acre area of impact is to "Disturbed," Tier IV habitat per the City's Biology Guidelines. Therefore, the project would not result in impacts to terrestrial sensitive vegetation communities. Additionally, no sensitive plant species were observed or are expected to occur within or immediately adjacent to the project site. Therefore, the project would not result in impacts to sensitive terrestrial plant species.

Based on observations made at the project site in June 2022 (a mean of 3.2 individuals per hour), January 2025 (a mean of 1.1 individuals per hour), and anecdotal information, it appears that visitor use is currently low and limited by two factors: (1) a lack of public accessible trails and pathways to the beach and (2) tidal height/surf conditions. Although the number of visitors to La Jolla Caves Beach is likely low on a daily basis, there is constant, low-level disturbance caused by the visitors who (1) walk on the intertidal algae and surfgrass and/or organisms that cover the rocks, some of which may be under the algae and surfgrass; (2) disturb and/or affect the behaviors of tidepool organisms through handling; and (3) collect organisms, removing them from the ecosystem in the existing condition.

The terminus of the public access easement would be at the base of the bluff, on the backshore boulder and/or cobble shoreline. This area is colonized by a low diversity of invertebrates (i.e., barnacles, limpets, snails, and crabs that frequent the higher and more stable rock surfaces. Few animals are found in the extensive cobble habitat, which is sensitive to seasonal sand inundation. Higher cover of algae and densities of invertebrates occur on the reef platform and tidepools. To avoid any potential loss of marine organisms and alternation of rocky intertidal habitat, no construction activity will occur in the marine intertidal habitat. In the absence of construction activity in this area, there would be no construction impacts to marine habitats or marine life, sensitive species, invasive species, Essential Fish Habitat, Habitats of Particular Concern, or Fisheries Management Plan species. Mitigation measures are not required. Appropriate Best Management Practices (BMPs) would be implemented as applicable by regulatory requirements.

Increased public access has potential to increase the number of dogs brought to La Jolla Cove Beach. To avoid any potentially significant impacts to biological resources resulting from an increase in the presence of dogs in the Matlahuayl State Marine Reserve associated with increased public access resulting from project implementation, the project includes a prominent "NO DOGS" sign. Project implementation would increase public access to La Jolla Caves Beach within the Matlahuayl State Marine Reserve, a Marine Protected Area where public access is allowed but biological resources are highly protected. It is expected that most users of the beach would be local residents,

and that the magnitude of the increase in use will be moderated by the general scarcity of available parking on Princess Street and Spindrift Drive. Authorized activities expected to increase due to project implementation include beach walking and enjoyment; ocean-recreational activities (e.g., surfing, stand-up paddle boarding, snorkeling, swimming, birding, tidepooling); education; and scientific research. The increase of authorized public use would result in impacts to biological resources associated with cobble/sand, boulder field, shale platform habitats, shallow tidal channels, and surfgrass meadows. Impacts to biological resources are expected to include trampling, handling, and removing organisms. Because the number of users is expected to increase only moderately due to project implementation; no species listed as threatened or endangered is expected to regularly occur in the project area; and surfgrass and other sensitive marine resources are difficult to access due to their low-and-subtidal habitat occurrence, impacts to biological resources associated with increased human use would be less than significant.

One invasive species, *Sargassum muticum*, which is a common component of the intertidal community in the project area, may be trampled by visitors walking on the rocky intertidal habitat. However, it is not likely to substantially spread as a result of any trampling or disturbance. Therefore, project implementation would not have a significant impact involving the potential spread of this or other invasive species. The project would not impact any species identified in a Fisheries Management Plan (FMP), none of which occurs within the project area. As discussed previously, the project would not significantly impact surfgrass, a Habitat Area of Particular Concern (HAPC). As such, impacts to sensitive marine resources would be less than significant.

No special-status wildlife species were observed on the site, but the following special-status species are considered to have moderate potential to occur on the project site: wandering skipper butterfly, Coronado skink, Southern California legless lizard, San Diego ringneck snake, and western bluebird. Establishment of a trail through the project site would impact approximately 0.02 acre of mainly exotic landscape plants. If any of these non-listed wildlife species is present on the project site, the magnitude of the proposed impact is so limited as to be considered less than significant. The Crotch's bumble bee was determined to have low potential due to very small size of site (0.02 acre) consisting of exotic landscaping and rock and failure to detect species during three Crotch's bumble bee surveys conducted during the species' "colony active" period.

Within the wider study area, brown pelicans regularly fly over the site and likely roost on the rocky beach with some regularity. The potential for increased public access to reduce the frequency of pelicans roosting on the beach represents a less-than-significant impact to the brown pelican, as ample roosting habitat for the pelican exists throughout the La Jolla area and elsewhere along the coast of San Diego County. Implementation of the proposed project would not result in potentially significant impacts to the pelican. Long-billed curlews could roost on the rocky beach and/or forage in the intertidal area, but any such use is expected to be only occasional. Any potential decrease in use resulting from project implementation would not result in potentially significant impacts to the long-billed curlew. American peregrine falcons and Cooper's hawks are expected to regularly fly over the site. Construction of the proposed trail, and increased public access to the study area, are not expected to substantially affect the occurrence of these species in the local area. No significant impacts would occur.

The larger study area, consisting of a rock/gravel beach and nearshore waters, lies within a protected cove difficult to access on foot. Five-hundred feet southwest of the site lie the steep and

impassable ocean cliffs of La Jolla. For these reasons, the study area does not appear to play an important role in regard to local or regional movement of wildlife. For these reasons, establishment of the trail and subsequent use of the trail by the public would not have a significant impact on wildlife movement. No mitigation is required.

The project is consistent with the mitigation measure from the PEIR, stating to limit public access in open space areas that contain sensitive biological resources to scientific ·or educational use. Access shall be confined to designated trails or paths and no access shall be approved by the City which would result in the disruption of habitat areas. The project would improve an existing public access easement along disturbed land and would not result in significant impacts to sensitive biological resources. No other mitigation measures from the PEIR are applicable to this project.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Cultural Resources

PEIR No. 92-0199

Archaeology

PEIR No. 92-0199 determined that development to occur within La Jolla, as proposed by the La Jolla CPU, could potentially impact both known and unknown cultural resources within the project area. Archaeological records reveal that La Jolla is rich in cultural resources. Disturbance and damage to cultural resources often occur during the excavation operations for a project, where unknown subsurface resources are uncovered. Future redevelopment projects would also be occurring on properties that have not been previously surveyed for cultural remains. PEIR No. 92-0199 concluded that development to occur over time within La Jolla could create direct impacts to both known and unknown prehistoric and historic archaeological resources.

PEIR No. 92-0199 includes mitigation measures consisting of policies and recommendations to minimize or avoid direct impacts to cultural resources potentially caused through the implementation of the La Jolla CPU. The mitigation measures state that future development projects may require additional archival research, intensive surveys, excavations, resource evaluations of discovered remains, or archaeological monitoring. The project applicant shall retain a qualified archaeologist to carry out these activities. Identified significant archaeological resources shall be avoided during excavation or construction at a project site, or preserved through capping or placement within an open space easement. When a significant resource would be disturbed by development, a research design and data recovery program, discussing in detail how the resource would be recovered, shall be prepared by the archaeologist and approved by the City prior to issuance of any discretionary permit. All cultural resource surveys, assessments, resource evaluations and report preparations shall be carried out in accordance with City of San Diego and CEQA guidelines. It would be determined, which of these activities would be required, during the environmental review of site-specific projects. With mitigation, the EIR determined that impacts would remain significant and unavoidable.

Built Environment

Historic surveys and inventories have been conducted for La Jolla, to identify those sites which are 45 years and older, and may have historical significance. The La Jolla-A Historic Inventory was compiled in 1977, and lists approximately 171 potentially historic sites throughout La Jolla. Thus, future development and redevelopment within La Jolla could impact structures/sites of unknown historical value.

The EIR concluded that development and redevelopment within La Jolla could potentially damage or destroy historically significant buildings, structures or sites representative of architectural periods or occupied by people of historical significance.

PEIR No. 92-0199 includes mitigation measures consisting of policies and recommendations to minimize or avoid direct impacts to historic sites potentially caused through the implementation of the La Jolla CPU. These policies and recommendations include identifying sites of potentially significant historic value, protecting existing structures of significant architectural and historical value, encouraging the adaptive reuse or relocation of older structures to another site within the community, and implementation of a comprehensive Historic Preservation Package in order to preserve historic resources under private ownership. The mitigation measures also state that the City Planning Department shall review all future projects which may alter a designated, or potentially eligible, historic site (typically a structure of 45 years or older). Any project proposal that substantially alters such a site shall be reviewed by the City's Historical Site Board. Site restoration shall follow specific guidelines set forth by the Board during the project's environmental review. All cultural resource surveys, assessments, resource evaluations and report preparations shall be carried out in accordance with City of San Diego and CEQA guidelines. It would be determined, which of these activities would be required, during the environmental review of site-specific projects. With mitigation, the EIR determined that impacts would remain significant and unavoidable.

Project

Archaeology

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and historical resources. The region has been inhabited by various cultural groups spanning 10,000 years or more.

Due to the location of the project site within the mapped boundaries of the Spindrift archaeological site, there is a high potential for project grading to impact known prehistoric resources including human remains. Therefore, the applicant was required to complete an archaeological survey with recommendations for testing, per the City of San Diego's Historical Resources Guidelines, in order to determine the presence and/or absence of any archaeological resources within the project's footprint.

An Archaeological Survey Report (Dudek, June 2025) was prepared for this project, which included the results of a testing plan. A total of four shovel test pits (STPs) and one control unit (CU) were excavated within the area of potential effect (APE). The four STPs and one CU were all sterile. A

registered archaeologist evaluated CA-SDI-39 located within the APE and did not encounter any artifacts, features, or subsurface deposits. The investigated portion of CA-SDI-39 within the APE is not considered a contributing element to the overall significance of the site under CEQA and City of San Diego Historical Resources Guidelines. An Updated California DPR 523 series form was completed for the site.

A Sacred Lands File search was conducted through the Native American Heritage Commission for the project. The results were positive and a list of Native American tribes who may also have knowledge of cultural resources in the project area was received. Letters were sent to each tribe on the list in order find out if any tribal cultural resources or places may be impacted by the project. No responses were received.

While no artifacts were identified on the surface and no subsurface deposits were encountered during the evaluation of CA-SDI-39 within the APE, because the Project is located along a coastal bluff, located in proximity to the Pacific Ocean, and in consideration of the documented presence of cultural resources deposits identified in the immediate vicinity previously identified within and adjacent to the APE, there is a high potential for the inadvertent discovery of archaeological resources during Project implementation. Archaeological and Native American monitoring during ground-disturbing activities for the Project is required as mitigation to reduce potential impacts to a less-than-significant level under CEQA, consistent with the mitigation measures of the PEIR.

Built Environment

The City of San Diego criteria for determination of historic significance, pursuant to CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. Projects requiring the demolition and/or modification of structures that are 45 years or older have the potential to result in potential impacts to a historical resource. The project site is adjacent to a single-family residence over 45 years oldand was reviewed by Historic Staff and it was found not to meet local historic designation criteria. Additionally, the project proposes a public accessway within the existing public access easement and does not propose any improvements to the existing residence. As such, no impact would occur to a built environment historical resource, and no mitigation is required.

Based on the foregoing analysis and information, the project is within the scope of the analysis of the PEIR and there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Hydrology/Water Quality

PEIR No. 92-0199

PEIR No. 92-0199 states that future development within La Jolla would increase the amount of impervious ground surfaces within La Jolla, and in turn, increase the overall amount of urban runoff. Urban runoff is a major contributor to nonpoint source pollution to surface waters within the Penasquitos Hydrographic Unit. During the rainy season, pollutants from stormwater runoff are washed off streets, roofs, lawns and landscaping, and parking lots, thus degrading the water quality

as it enters the area's rivers, creeks, coastal wetlands, lagoons, bays and the Pacific Ocean. The potential pollutants carried in stormwater runoff include sediment, heavy metals, oil, grease, gasoline, and other petroleum derivatives, fertilizers, pesticides, nutrients, animal wastes, salts and bacteria. Adverse impacts include more frequent and severe flooding, streambank and coastal bluff erosion, increased sedimentation in riparian areas and estuaries, and pollutant export.

PEIR No. 92-0199 determined that through implementation of the proposed land use plan for the La Jolla CPU, development could result in direct and indirect impacts to the natural hydrology and water quality of community groundwater, traversing creeks and canyon drainage areas and the Pacific Ocean shoreline. Incremental development and redevelopment occurring over a period of time, could contribute to cumulative impacts to hydrology/water quality as well.

PEIR No. 92-0199 includes mitigation measures consisting of policies and recommendations to minimize or avoid impacts associated with the hydrology/water quality within the La Jolla Community Planning Area including implementing appropriate erosion control measures, limiting encroachment of new development in designated Open Space, maintaining the natural surface drainage system, limiting total amount of surface ground cover, requiring indigenous native and drought tolerant plants along coastal bluffs, improving existing street drainage outlet, and directing drainage away from the bluff edge. The mitigation measures also state that detailed mitigation measures would be formulated during environmental review of site-specific projects.

Project

The project was reviewed by City Engineering staff for all applicable water quality standards and water discharge requirements. The project would be conditioned to comply with the City's Storm Water Regulations during and after construction, and appropriate Best Management Practices (BMP's) would be utilized. Implementation of project specific BMP's would preclude violations of any existing water quality standards or discharge requirements. Impacts would be less than significant.

Based on the foregoing analysis, the project is within the scope of the a-PEIR and there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would there be a substantial increase in the severity of impacts from those described in the PEIR.

Noise

PEIR No. 92-0199

PEIR No. 92-0199 determined that the most prevalent and consistent source of noise within La Jolla would continue to be generated by vehicular traffic. The City's Planning Department had established thresholds for which noise studies or calculations would be required for new construction impacted by traffic noise. With respect to noise from adjacent stationary uses, a project which would generate noise levels at the property line which exceed the City 's Noise Ordinance standards, were considered a potential noise impact. Increases in urban noise levels affecting a wildlife refuge, or open space park were also determined significant on a case-by-case basis. Temporary construction noise which exceeds 75 dB(A) CNEL for 12 hours within a 24-hour period at residences were also considered significant. Where temporary construction noise would substantially interfere with

normal business communication, or affect sensitive receptors, temporary noise impacts were considered significant.

PEIR No. 92-0199 determined that implementation of the land use plan set forth in the La Jolla CPU, could create direct impacts on the ambient noise quality of the community. As future development occurs incrementally, implementation of the La Jolla CPU could create cumulative noise impacts within the community.

PEIR No. 92-0199 includes mitigation measures which state that noise impacts are determined on a project-by-project basis and can vary depending upon the project type and site. Noise attenuation can be accomplished by noise avoidance, implementing structural alterations or constructing noise walls and/or noise berms. Avoidance involves the altering of site plans so that sensitive receptors are located outside the area of impact. Structural mitigation involves building techniques, including insulation and special window treatments, to reduce interior noise levels. Structural measures would also include mechanical ventilation or air conditioning so that windows can remain closed and still meet ventilation requirements. Physical mitigation includes the installation of noise walls and/or noise berms. With mitigation, impacts were still determined to be significant and unavoidable.

Project

Short-term noise impacts would be associated with onsite grading, and construction activities of the project. Construction-related short-term noise levels would be higher than existing ambient noise levels in the project area but would no longer occur once construction is completed. Sensitive receptors (e.g. residential uses) occur in the immediate area and may be temporarily affected by construction noise; however, construction activities would be required to comply with the construction hours and noise limits specified in the City's Municipal Code (Section 59.5.0404, Construction Noise), which are intended to reduce potential adverse effects resulting from construction noise. Therefore, construction noise impacts would be less than significant.

For the long-term, typical noise levels associated with coastal public accessways are anticipated. The noise sources on the project site after completion of construction are anticipated to be those that would be typical of any public accessways, such as visitors walking and conversing along the accessway and maintenance activities. None of these noise sources associated with the coastal public access uses are anticipated to violate the City's Noise Abatement and Control Ordinance or result in a substantial permanent increase in existing noise levels. The project would not result in noise levels in excess of standards established in the City of San Diego General Plan or Noise Ordinance. No mitigation measures from PEIR No. 92-0199 are applicable to this project. Impacts would be less than significant and no mitigation is required.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR CEQA

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified PEIR determined the La Jolla Community Plan Update would have less than significant impacts to Geology/Soils, Air Quality, Hydrology/ Water Quality, Biology, Noise, Light, Glare and Shading, Land Use, Natural Resources, Recreational Resources, Population, Housing, Transportation/Circulation, Public Services, Utilities, Energy, Water Conservation, Neighborhood Character/Aesthetics, Cultural

Resources, Paleontological Resources, and Human Health/Public Safety. Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum, would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The La Jolla and Pacific Beach Community Plan and Local Coastal Program Land Use Plan Updates EIR No. 92-0199 / SCH No. 92071032 concluded that significant impacts related to traffic and circulation, air quality, geology and soils, biology, cultural resources, hydrology and water quality, and noise, would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the EIR would result in significant traffic and circulation, air quality, and hydrology and water quality, which would remain significant and unmitigated. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

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

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

1. Prior to the issuance of 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 construction documents (CD) (plans, specification, details, etc.) to ensure the applicable MMRP requirements are incorporated into the design and/or construction documents.

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 of San Diego (City) website:

https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates

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.

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

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

   Qualified Archaeologist
   Qualified Native American Monitor

   Note: If all responsible Permit Holders' representatives and consultants fail to attend, an additional meeting with all parties present will be required.

   CONTACT INFORMATION:
   a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division and can be reached at (858) 627-3200
   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, contact call RE and MMC at (858) 627-3360

2. **MMRP COMPLIANCE:** This Project, PRJ-1109252 and /or Environmental Document 1109252 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 the 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, monitoring times, methodology, etc.)

   Note: The Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans, notes, or changes due to field

conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **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.

   None Applicable

4. **MONITORING EXHIBITS:** All consultants are required to submit to RE and MMC, a monitoring exhibit on an 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.**

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

Document Submittal/Inspection Checklist		
Issue Area	**Document Submittal**	**Associated Inspection/Approvals/Notes**
General	Consultant Qualification Letters	Prior to the Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at the Preconstruction Meeting
Archaeology	Monitoring Reports	Archaeology/Historic Site Observation
Tribal Cultural Resources	Monitoring Reports	Archaeology/Historic Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

HISTORICAL RESOURCES (ARCHAEOLOGY)

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. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the 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 will 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 must 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. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, 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 Precon 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 Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored

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 or emailed 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 Guidelines Section, 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 Native American Heritage Commission (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 Guidelines 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;
   b. 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
   c. 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. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

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 precon meeting.
2. The following procedures shall be followed.
   a. No Discoveries
      In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM 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 8AM 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.

TRIBAL CULTURAL RESOURCES

Refer to the mitigation measures outlined under Historical Resources (Archaeology).

IX. CERTIFICATION

Copies of the addendum, certified PEIR, Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

Jeffrey Szymanski

Jeffrey Szymanski
Senior Planner
Development Services Department

March 24, 2026
Date of Final Report

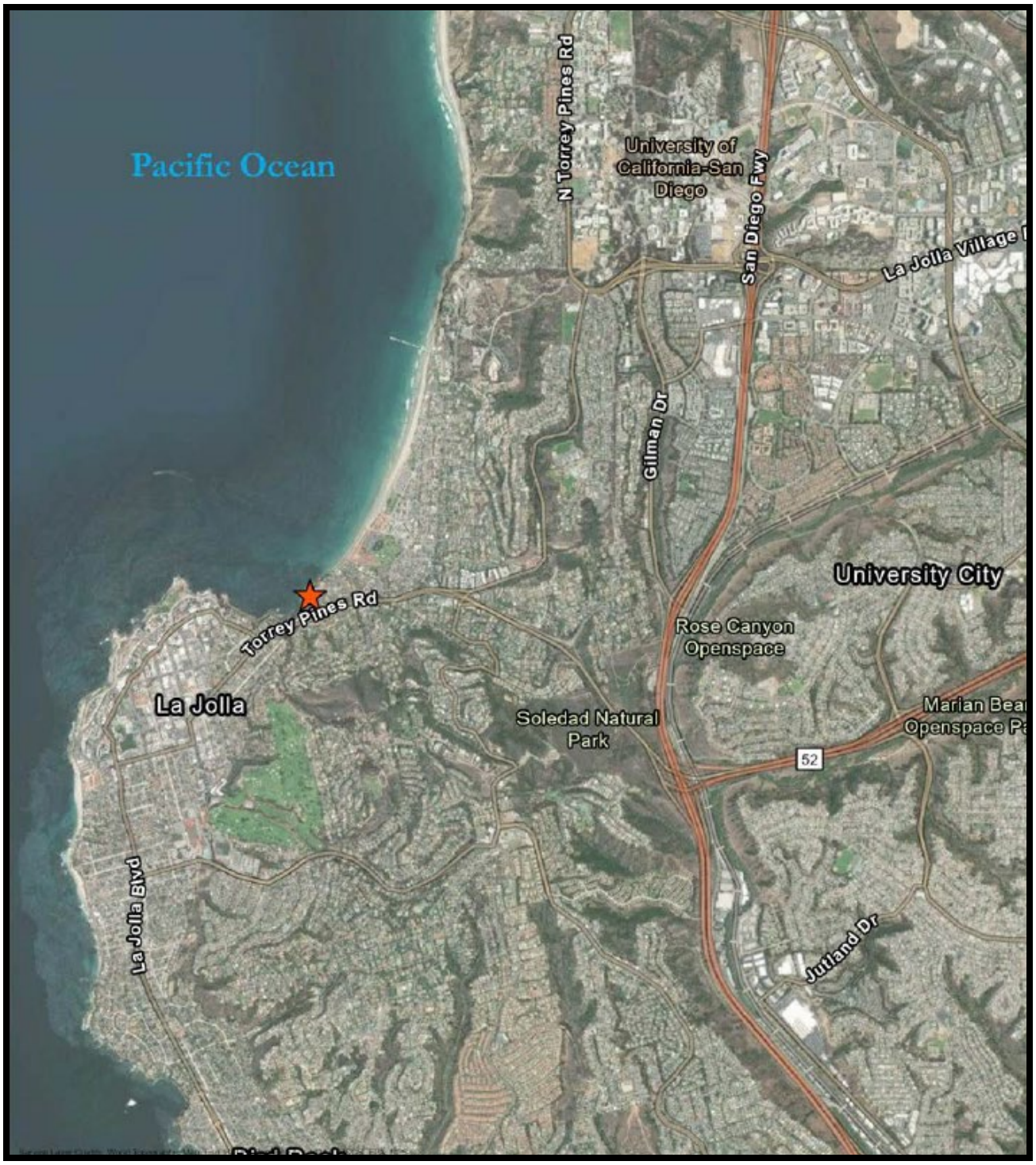
Analyst: Marlene Watanabe

Attachments:

Figure 1: Location Map
Figure 2: Site Plan
Environmental Impact Report No. 92-0199 / SCH No. 92071032

Technical Appendices (provided under separate cover)

Appendix A: Biological Survey Report (Terrestrial)
Appendix B: Biological Survey Report (Intertidal/Marine)
Appendix C: Geotechnical Investigation
Appendix D: Archaeological Survey Report



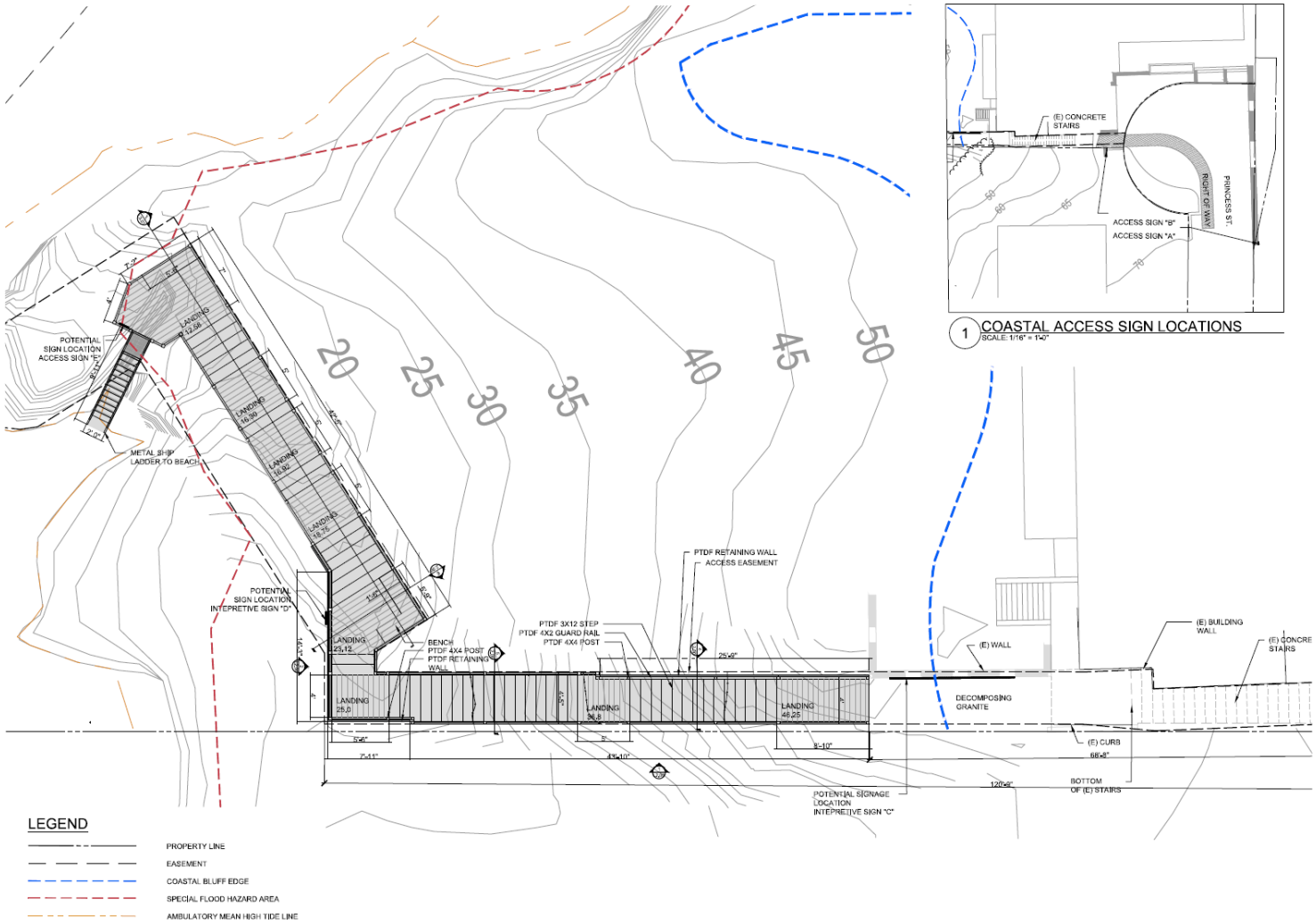
The City of SAN DIEGO

Location Map

7957 Princess St / PRJ-1109252

Development Services Department

FIGURE No. 1



The City of SAN DIEGO

Site Plan

7957 Princess St / PRJ-1109252

Development Services Department

FIGURE No. 2