



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: October 24, 2013

PUBLIC NOTICE OF

MASTER ENVIRONMENTAL IMPACT REPORT-SUBSEQUENT PROJECT FINDINGS

WBS No.: S-10091.02.06

---

The City of San Diego Development Services Department Advanced Planning & Engineering Division has prepared Master Environmental Impact Report (MEIR) Findings for Project No. 236548 (Findings to MEIR No. 91-0644) for the action listed below. This notice of the availability of Findings to a Master EIR is made in accordance with the CEQA Guidelines Section 15179. **A public review and comment period is not required as Master EIR Findings are considered final environmental documents;** however the Findings and MEIR have been placed on the City of San Diego web-site for a period of 30-days at:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>

Questions about the CEQA document should be routed to: **Myra Herrmann, Senior Planner, City of San Diego, Development Services Department, 1222 First Avenue, MS 501, San Diego, CA 92101** or via e-mail to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov) with the Project Name and Number in the subject line.

**General Project Information:**

- Project Name: **SUNSET CLIFFS NATURAL PARK (SCNP) HILLSIDE SECTION IMPROVEMENTS**
- Project No.: **236548**
- Community Plan Area: **Peninsula**
- Council District: **2**

**Subject: SITE DEVELOPMENT PERMIT (SDP) and COASTAL DEVELOPMENT PERMIT (CDP)** to allow for the improvement of a pedestrian trail system, associated appurtenances and observation points, implementation of a phased revegetation program, removal of non-native vegetation and re-contouring and revegetation of the former ball field within the Hillside Section of the Sunset Cliffs Natural Park (SCNP) south of Ladera Street. Trail improvements include use of stabilized decomposed granite (DG) to the existing 8-foot sewer easement access path and will comply with American with Disabilities Act (ADA) accessibility requirements and will also provide bicycle access through the park. Primary trails (up to 6 feet wide) will be improved with natural surfacing (or DG as necessary to create a stable pathway) to connect various park uses, link observation points and link the park to the surrounding community. Secondary trails (up to 3 feet wide) will be improved with natural surfacing, and an ADA trail would be created to allow access from the lower parking lot to an

observation point. The secondary and tertiary trails not part of the planned trail system will be restored with native vegetation to match the surrounding native vegetation. Additionally, a new drainage swale, vegetated with native plants will be created on the slope above the new multi-use trail to reduce the amount of runoff crossing the trail from the hillside above. The project also includes removal of the concrete slab remaining from demolition of the burnt down southern Ladera Street properties and revegetation of the area with native plants. Sunset Cliffs Natural Park is bordered to the north by the intersection of Ladera Street and Sunset Cliffs Boulevard; to the west by the Pacific Ocean; to the east by residential homes and Point Loma Nazarene University; and federal land managed by the U.S. Navy to the south. The site is not included on any Government Code listing of hazardous waste sites.

**Applicant:** City of San Diego, Public Works-Engineering and Capital Projects Department

**Determination and Recommended Finding:** The City of San Diego Advance Planning & Engineering Division concludes that the Sunset Cliff Natural Park Hillside Section Improvements project could have a significant environmental effect in the areas of BIOLOGICAL RESOURCES, LAND USE (MSCP/MHPA), HISTORICAL RESOURCES (ARCHAEOLOGY) and PALEONTOLOGICAL RESOURCES but that those effects were previously examined in the Sunset Cliff Natural Park Master Plan MEIR (LDR No. 91-0644) and the project would not result in any additional significant effects on the environment beyond those identified in the MEIR No. 91-0644. It recommends that the lead agency make findings that no additional significant environmental effect will result from the project, no additional mitigation measures or alternatives are required, the project is within the scope of MEIR No. 91-0644 and no substantial changes have occurred with respect to the circumstances under which the MEIR was certified or there is no new information which was not known and could not have been known at the time the MEIR was certified. The proposed project is considered to be within the scope of analysis of the Specific Plan as examined by the MEIR and as presented in the MEIR Subsequent Project Findings pursuant to CEQA Sections 15177 and 15179.

**Availability in Alternative Format:** To request this Notice, the Findings to MEIR, the MEIR, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Myra Herrmann at (619) 446-5372. The MEIR-Subsequent Project Findings No. 236548, original MEIR, and any supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center located at 1222 First Avenue, San Diego, CA 92101. **For information regarding hearings for this project, contact Morris Dye at (619) 446-5201.** This notice was also published in the SAN DIEGO DAILY TRANSCRIPT on October 24, 2013.

Cathy Winterrowd  
Interim Deputy Director  
Development Services Department



Advanced Planning &  
Engineering  
(619-446-5460)

## MASTER ENVIRONMENTAL IMPACT REPORT SUBSEQUENT PROJECT FINDINGS

PTS No. 236548

Findings to MEIR No. 91-0644, SCH No. 97101071

**SUBJECT: SUNSET CLIFFS NATURAL PARK HILLSIDE SECTION IMPROVEMENTS PROJECT. SITE DEVELOPMENT PERMIT (SDP) and COASTAL DEVELOPMENT PERMIT (CDP) to allow for the improvement of a pedestrian trail system, associated appurtenances and observation points, implementation of a phased revegetation program, removal of non-native vegetation and re-contouring and revegetation of the former ball field within the Hillside Section of the Sunset Cliffs Natural Park (SCNP) south of Ladera Street. Trail improvements include use of stabilized decomposed granite (DG) to the existing 8-foot sewer easement access path and would comply with American with Disabilities Act (ADA) accessibility requirements and will also provide bicycle access through the park. Primary trails (up to 6 feet wide) will be improved with natural surfacing (or DG as necessary to create a stable pathway) to connect various park uses, link observation points and link the park to the surrounding community. Secondary trails (up to 3 feet wide) would be improved with natural surfacing and an ADA trail would be created to allow access from the lower parking lot to an observation point. The secondary and tertiary trails not part of the planned trail system, will be restored with native vegetation to match the surrounding native vegetation. Additionally, a new drainage swale vegetated with native plants will be created on the slope above the new multi-use trail to reduce the amount of runoff crossing the trail from the hillside above. The project also includes removal of the concrete slab remaining from demolition of the burnt down southern Ladera Street properties and revegetation of the area with native plants.**

**Applicant:** City of San Diego, Public Works-Engineering and Capital Projects Department

- I. PROJECT DESCRIPTION:** See attached Initial Study.
- II. ENVIRONMENTAL SETTING:** See attached Initial Study.
- III. PROJECT BACKGROUND:** Sunset Cliffs Natural Park (SCNP) is located at the southwestern border of the Peninsula Community Planning Area. In 2003, the Sunset Cliffs Natural Park Master Plan, Master Environmental Impact Report (MEIR) No. 91-0644 was prepared by the City of San Diego as Lead Agency under the California Environmental Quality Act (CEQA), and finalized on May 18, 2004. On December 7, 2004, the San Diego City Council adopted the Master Plan and certified the MEIR. In July 2005, the State of California Coastal Commission approved the Master Plan and accompanying MEIR. In 2008, the San

Diego City Council established a new Capital Improvement Project (CIP) for the SCNP Hillside Section Improvements and authorized City staff to apply for grant funding to fund the CIP. The SCNP Master Plan divides the Park into two sections: the 18-acres Linear Park and the 50-acre Hillside Section. The SCNPMP identified improvements in the Ridge Slope, Coastal Terrace and Cliffs/Bluffs areas within the Hillside Section. Over time, some elements in these areas have been implemented such as the elimination of the athletic field, including removal of irrigation, discontinuing turf maintenance and removal of fencing, and baseball field equipment; new stairs have been constructed at Ladera Street, and the lower parking lot has been repaved. Within the Coastal Terrace, the SCNPMP recommended demolition of the Ladera Street Properties. The current project initially included demolition of both Ladera Street properties (also referred to as the Dixon Estates); however, in April 2013, an arson fire occurred at the abandoned southern-most property located at 4401 Ladrera Street and was subsequently demolished because the post-fire remnants of the property were considered a nuisance and a threat to public health and safety. The northern-most Ladera Street property located at 4515 Ladera Street was re-evaluated as part of the current project review in accordance with the Historical Resources Regulations and Guidelines and determined to be eligible for local designation. As such, the trail was realigned in this area to avoid the potentially historic resource, which now will be retained on-site.

**IV. DETERMINATION:** The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental affect in the following area(s): **LAND USE (MSCP/MHPA), BIOLOGICAL RESOURCES, HISTORICAL RESOURCES (ARCHAEOLOGY) AND PALEONTOLOGICAL RESOURCES.** Subsequent revisions in the project proposal create the specific mitigation identified in Section V of these Findings. The project, as revised, now avoids or mitigates the potentially significant environmental effects previously identified consistent with the Subarea V Master Environmental Impact Report and the preparation of an EIR, a subsequent EIR, or a Mitigated Negative Declaration is not required. Based on the Initial Study for the subject project, the City of San Diego as the Lead Agency for the proposed Sunset Cliffs Natural Park Hillside Park Improvements Project, has reached the following determinations:

- A. The Sunset Cliffs Natural Park Hillside Park Improvements Project was considered within the scope of analysis of the Sunset Cliffs Natural Park Master Plan as examined by the Master Environmental Impact Report and pursuant to Section 21157.1 (c) of the Public Resources Code.
- B. Implementation of the proposed project would not result in any additional significant effects on the environment beyond those identified in the Master Environmental Impact Report, as defined in Subdivision (d) of Section 21158 of the Public Resources Code. As such, the proposed project would not require additional mitigation measures and/or alternatives analysis.
- C. The proposed project is considered to be within the scope of analysis of the Sunset Cliffs Natural Park Master Plan as examined by the Master Environmental Impact Report and no new environmental document or findings pursuant to Section 21081 of the Public Resources Code are required.

- D. No substantial changes have occurred with respect to the circumstances under which the Sunset Cliffs Natural Park Master Plan Master Environmental Impact Report was certified, there is no new available information which was not known and could not have been known at the time the Master Environmental Impact Report was certified, and no new environmental document pursuant to Section 21157.6(a) of the Public Resources Code is required.

In accordance with Section 21157.1 of the Public Resources Code, these Findings have therefore been prepared. Public notice of this determination, pursuant to Section 21092 of the Public Resources Code has been made. Per SDMC Section 128.0310, this document has been made available 14 days prior to certification of this determination.

- V. **DOCUMENTATION:** The attached Initial Study documents the reasons to support the above Determination.

- VI. **MITIGATION, MONITORING AND REPORTING PROGRAM (MMRP):** To ensure that site development would avoid significant environmental impacts, a Mitigation, Monitoring, and Reporting Program (MMRP) is required. Compliance with the mitigation measures shall be the responsibility of the applicant. The mitigation measures are described below.

**A. GENERAL REQUIREMENTS – PART I**

Plan Check Phase (prior to permit issuance)

1. Prior to issuance of a Notice to Proceed (NTC) or any construction permits, including but not limited to the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, or 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 MMRP requirements have been incorporated.
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/development-services/industry/standtemp.shtml>

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

**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 as necessary:

**Project Biologist/Monitors**  
**Landscape Contractor**  
**Archaeologist/Monitors**  
**Native American Observer/Monitors**  
**Paleontologist/Monitors**

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, it is also required to call **RE and MMC at 858-627-3360**

- 2. MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 236548 or for subsequent future projects the associated PTS No, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's ED, 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.

- 3. OTHER AGENCY REQUIREMENTS:** Evidence that any other agency requirements or permits have been obtained or are in process 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 as applicable.

***NONE REQUIRED FOR THIS PROJECT***

- 4. 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.

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**

<b><i>Issue Area</i></b>	<b><i>Document submittal</i></b>	<b><i>Associated Inspection/Approvals/Note</i></b>
General	Consultant Qualification Letters	Prior to Pre-construction meeting
General	Consultant Const. Monitoring	Prior to or at Pre-Con Meeting
Biology	Revegetation/Restoration Plans	Limit of Work Verification/site observations
Biology	Biology Monitoring Reports	Precon survey/monitoring reports
Archaeology	Consultant Qualifications	Prior to Pre-Construction meeting
Archaeology	Archaeology Monitoring Reports	Monitoring Reports (draft + final)
Paleontology	Paleontological Monitoring Reports	Monitoring Reports (draft + final)
Final MMRP	Final monitoring reports	Final MMRP inspection

**C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS**

**BIOLOGICAL RESOURCES (MITIGATION FOR DIRECT IMPACTS TO TIER 1 – IIIB HABITAT)**

**THIS PROJECT REQUIRES IMPLEMENTATION OF MITIGATION FOR DIRECT IMPACTS TO TIER I-IIIB HABITAT IN ACCORDANCE WITH THE *BIOLOGICAL RESOURCES TECHNICAL REPORT FOR THE SUNSET CLIFFS NATURAL PARK HILLSIDE SECTION IMPROVEMENTS* prepared by URS (APRIL 2013) AND AS INDICATED IN TABLE 1 BELOW:**

**I. Entitlement Plan Check - Prior to Permit Issuance**

- a. Prior to Permit Issuance and/or the Notice to Proceed (which will be sent to DSD), the Owner/Permittee shall provide detailed plans and specifications to DSD for review for the restoration of upland habitat satisfactory to the City Manager to mitigate for direct impacts to Tier I, II and IIIB habitat consisting of 0.01 acre of Maritime Succulent Scrub (Cactus scrub), 0.01 acre of unvegetated sandstone, <0.01 acre of cliff face, beach and rocky shore, 0.15 acre of coastal sage scrub (including 0.10 of disturbed habitat) and 0.11 acre of non-native grassland within the MHPA via restoration of 0.30 acres of habitat, consisting of 0.02 acre of Maritime Succulent Scrub (Cactus scrub), 0.02 acre of unvegetated sandstone, <0.01 acre of cliff face, beach & rocky shore, 0.15 acres of Diegan coastal sage scrub and 0.11 acres of non-native grassland. Specifications must be found to be in conformance with the conceptual *Revegetation Plan (Plan)* prepared by URS Corporation (April 2013).

**TABLE 1**  
**SENSITIVE VEGETATION IMPACTS AND MITIGATION FOR TRAIL IMPROVEMENTS**

VEGETATION COMMUNITY	MSCP TIER	EXISTING ACRES	MITIGATION RATIO	ACRES IMPACTED	REQUIRED MITIGATION	ACRES REMAINING & PRESERVED ON-SITE
Maritime Succulent Scrub (Cactus Scrub)	I	1.87	2:1	0.01	0.02	1.86
Unvegetated Sandstone	I	3.18	2:1	0.01	0.02	3.17
Cliff Face, Beach and Rocky Shore	I	1.00	2:1	<0.01	<0.01	1.00
Coastal Sage Scrub	II	3.16	1:1	0.05	0.05	3.11
Disturbed Coastal Sage Scrub	II	7.08	1:1	0.10	0.10	6.98
Non-Native Grassland	IIIB	4.10	1:1	0.11	0.11	3.99
<b>TOTAL</b>				<b>0.28</b>	<b>0.30</b>	<b>20.11</b>

b. **Note:** The revegetation plan exceeds the mitigation requirement by providing for a total net increase of 6.96 acres of sensitive vegetation (Tiers I, II and IIIB) in Phase 1 and a total net increase of 7.71 acres of sensitive vegetation (Tiers I and II) in Phase II. Phase II revegetation would remove ruderal habitat, non-native grassland and eucalyptus trees and revegetate the areas to maritime succulent scrub (Tier I) and coastal sage scrub (Tier II) habitats. After Phase 2, the 37.95 acre Project site should support 34.78 acres of Tier I and Tier II habitat (Table 8) for a total net increase of 14.67 acres. Areas successfully restored beyond the 0.30 acres required as mitigation for the project shall be available to offset mitigation requirements for future projects consistent with the MEIR within SCNP. Consultation with DSD Environmental and MSCP staff along with approval by the Wildlife Agencies (if applicable) shall be required prior to sign-off in order to verify that project types within SCNP (and their location) would be able to use excess the mitigation credits.

1. Mitigation Goal: The project shall mitigate for impacts to 0.28 acres of upland habitat through the restoration of 0.02 acre of Cactus scrub, 0.02 acre of unvegetated sandstone, <0.01 acre of cliff face/beach/rocky shore, 0.15 acre Diegan coastal sage and 0.11 acre of non-native grassland within the Sunset Cliffs Natural Park Hillside Section as detailed in the Plan.
2. Responsibilities: The Contractor shall be responsible for all grading and contouring, clearing and grubbing, installation of plant materials and native seed mixes, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period as detailed in the Mitigation Plan.

Standard Best Management Practices shall be implemented to insure that sensitive biological resources would not be impacted by water runoff.

3. **Biological Monitoring Requirements:** All biological monitoring in or adjacent to wetlands shall be conducted by a qualified wetland biologist. The biologist shall conduct construction monitoring during all phases of the project. Orange flagging shall be used to protect sensitive habitat. Construction related activity shall be limited to the construction corridor areas as identified on the construction plans. Both a detailed Performance Criteria plan and all the maintenance requirements are found in the Offsite Mitigation Plan.
4. **Notification of Completion:** At the end of the fifth year, a final report shall be submitted to Mitigation Monitoring Coordination section evaluating the success of the mitigation. The report shall make a determination of whether the requirements of the mitigation plan have been achieved. If the final report indicates that the mitigation has been in part, or whole, unsuccessful, the Applicant shall be required to submit a revised or supplemental mitigation program to compensate for those portions of the original mitigation program which were not successful. At such time, the Applicant must consult with the Development Services Department. The Applicant understands that agreed upon remedial measures may result in extensions to the long-term maintenance and monitoring.

## II. 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 (2012), 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 Regulation (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **BCME** -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 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 raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (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 DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan 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 or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan 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.).

### **III. 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 e-mailed to MMC on the 1<sup>st</sup> day of monitoring, the 1<sup>st</sup> 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.

### **IV. 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 90 days of construction completion.

### **GENERAL NESTING BIRD MITIGATION**

To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (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 (precon) 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 precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan 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 or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City’s MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.

## LAND USE – MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP/MHPA)

- I. Prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following:
  - A. **Grading/Land Development/MHPA Boundaries** - MHPA boundaries on-site and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.
  - B. **Drainage** - All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.
  - C. **Toxics/Project Staging Areas/Equipment Storage** - Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Where applicable, this requirement shall be incorporated into leases on publicly-owned property when applications for renewal occur. Provide a note in/on the CD's that states: "*All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA.*"
  - D. **Invasives**- No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.
  - E. **Noise** - Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: California Gnatcatcher (3/1-8/15). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys shall be required in order to determine species presence/absence. If protocol

surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring.

When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated as follows:

#### SPECIAL STATUS BIRD CONDITIONS

All maintenance activities shall be conducted outside established breeding seasons for the following special-status birds (i.e., August 15 through March 1, annually) which are known to occur within the study area: California gnatcatcher.

#### CALIFORNIA GNATCATCHER (STATE ENDANGERED/FEDERALLY ENDANGERED)

No clearing, grubbing, grading, or other construction activities shall occur between *March 1<sup>st</sup>* and *August 15<sup>th</sup>*, the breeding season of the California Gnatcatcher, until the following requirements have been met to the satisfaction of the ADD/Environmental Designee:

- A. A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) shall survey those areas that would be subject to construction noise levels exceeding 60 decibels [db(a)] hourly average for the presence of the California gnatcatcher. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction. If the California Gnatcatcher is present, then the following conditions must be met:
  - I. Between March 1 and August 15, no clearing, grubbing, or grading of occupied California gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
  - II. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 db(a) hourly average at the edge of occupied California Gnatcatcher or habitat. An analysis showing that noise generated by construction activities would not exceed 60 db(a) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the city manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked, fenced or flagged under the supervision of a qualified biologist; or
  - III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 db(a) hourly average at the edge of habitat occupied by the California Gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring\* shall be

conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 db(a) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

- \* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 db(a) hourly average or to the ambient noise level if it already exceeds 60 db(a) hourly average. If not, other measures shall be implemented in consultation with the biologist and the add/environmental designee, as necessary, to reduce noise levels to below 60 db(a) hourly average or to the ambient noise level if it already exceeds 60 db(a) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

B. If California gnatcatchers are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD/Environmental Designee and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1<sup>st</sup> and August 15<sup>th</sup> as follows:

1. If this evidence indicates the potential is high for California gnatcatcher to be present based on historical records or site conditions, then condition A. III., shall be adhered to as specified above.
2. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

## **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 1/4 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 (CSVSR). The CSVSR'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 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 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 notified by the Commission; 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, THEN,
  - c. 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 on the site;
    - (3) Record a document with the County.

- d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- 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, 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 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 CSV 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.

**PALEONTOLOGICAL RESOURCES**

**I. Prior to Permit Issuance**

**A. Entitlements Plan Check**

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

**B. Letters of Qualification have been submitted to ADD**

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

**II. Prior to Start of Construction**

**A. Verification of Records Search**

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution 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.

**B. PI Shall Attend Precon Meetings**

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the 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  
Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
  - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
  - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

### III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
  1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**
  2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
  3. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV'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 Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
  2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
  3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
- C. Determination of Significance
  1. The PI shall evaluate the significance of the resource.
    - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall

be at the discretion of the PI.

- b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
- c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
- d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

#### **IV. Night and/or Weekend Work**

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

#### **V. Post Construction**

- A. Preparation and Submittal of Draft Monitoring Report
  1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
    - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

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

**VII. SIGNIFICANT UNMITIGATED IMPACTS:** The City of San Diego has determined that the Sunset Cliffs Natural Park Hillside Park Improvements Project would not result in any significant effects on the environment beyond those examined in the *Sunset Cliffs Natural Park Master EIR (MEIR No. 91-0644)*. The Final MEIR did not identify any significant unmitigated impacts, and mitigation for all potentially significant impacts associated with implementation of the Sunset Cliffs Natural Park Master Plan was included in the adopted Mitigation Monitoring and Reporting Program. Approval of the Master Plan did not require the decision maker(s) to make specific and substantiated CEQA Findings or a Statement of Overriding Considerations. Consequently, the current project is consistent with the MEIR and therefore CEQA Findings are not required.

**VIII. DISTRIBUTION:** Pursuant to CEQA Section 15177, public notice is required for Master EIR Findings for a period of 30 days. A public review and comment period is not required as Master EIR Findings are considered final environmental documents. The intent of the distribution below is to provide other public agencies, the public, and the decision makers the opportunity to review the final document before the first public hearing or discretionary action on the project. No comments are solicited and no written responses to comments on this final environmental document shall be prepared.

U.S. Government

Fish and Wildlife Service (23)

Navy Facilities Engineering Command Southwest (8 & 12)

State of California

Department of Fish and Wildlife (32A)

Toxic Substances Control (39)

Natural Resources Agency (43)

Regional Water Quality Control Board (44)

Coastal Commission (47)

Coastal Conservancy (54)

Native American Heritage Commission (56)

City of San Diego

Mayor's Office

Councilmember Kevin Faulconer - District 2

City Attorney's Office

Shannon Thomas (MS 59)

Development Services Department

Myra Herrmann – Environmental

Morris Dye - Project Manager

Gary Geiler – Planning Reviewer

Kristin Forburger – MSCP

Jeff Harkness – Park Planning Reviewer

Julius Ocen – Engineering Review

Terre Lien – Landscape Review

Tony Kempton - Long Range Planning

Ron Carter - Fire and Life Safety

MMC (MS 1102B)

Kelley Stanco – Historical Resources

Mehdi Rastakhiz

Farah Mahzari – Transportation Review

Bill Prinz – Local Enforcement Agency

San Diego Central Library (81)

Point Loma/ Hervey Family Branch Library (81F)

Ocean Beach Branch Library (81V)

Park & Recreation Department

Michael Ruiz

Public Utilities Department

Keli Balo

Dirk Smith

Public Works – Engineering & Capital Projects Department

Ali Darvishi

Joseph Diab

Jeannette DeAngelis

Darren Genova

Environmental Services Department

Sylvia Costello

Other Groups and Individuals

San Diego Gas and Electric (114)

San Diego Coast & Baykeeper (173)

Sierra Club (165)

Neighborhood Canyon Creek & Park Groups (165A)

San Diego Audubon Society (167)

Mr. Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitats League (182A)

San Diego History Center (211)

San Diego Natural History Museum (166)

Carmen Lucas (206)

Clint Linton (215B)

South Coastal Information Center @ San Diego State University (210)

San Diego Archaeological Center (212)

Ron Christman (215)

Frank Brown - Inter-Tribal Cultural Resource Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society (218)

Kumeyaay Cultural Repatriation Committee (225)

Kumeyaay Cultural Heritage Preservation (223)

Native American Distribution (225A-S) PUBLIC NOTICE + SITE PLAN ONLY

Barona Group of Capitan Grande Band of Mission Indians (225A)

Campo Band of Mission Indians (225B)

Ewiaapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)

Viejas Group of Capitan Grande Band of Mission Indians (225I)

Mesa Grande Band of Mission Indians (225J)

San Pasqual Band of Mission Indians (225K)

Ipai Nation of Santa Ysabel (225L)

La Jolla Band of Mission Indians (225M)

Pala Band of Mission Indians (225N)

Pauma Band of Mission Indians (225O)

Pechanga Band of Mission Indians (225P)  
Rincon Band of Luiseno Indians (225Q)  
San Luis Rey Band of Luiseno Indians (225R)  
Los Coyotes Band of Mission Indians (225S)  
Peninsula Community Planning Board (390)  
Ocean Beach Community Planning Board (367)  
Ocean Beach Town Council (367A)  
Peninsula Chamber of Commerce (391)  
Point Loma Nazarene University (392)  
Sunset Cliffs Natural Park Recreation Council (388)  
San Diego Community Newspaper Group (The Peninsula Beacon) (389)  
Richard Lareau – Point Loma Village Association (395)  
Craig Barilotti - Sunset Cliffs Association  
David Goldin  
Ellen Quick  
Ann Swanson  
Nick DeLorenzo  
Bob and Mary Kolb  
Ruth Hoffman  
Joe Esposito - Estrada Land Planning (Landscape Architect)  
URS Corporation (Biological & Archaeological Consultant)  
Nasland Engineering (Consultant)  
Scott Moomjian (Historical Consultant)

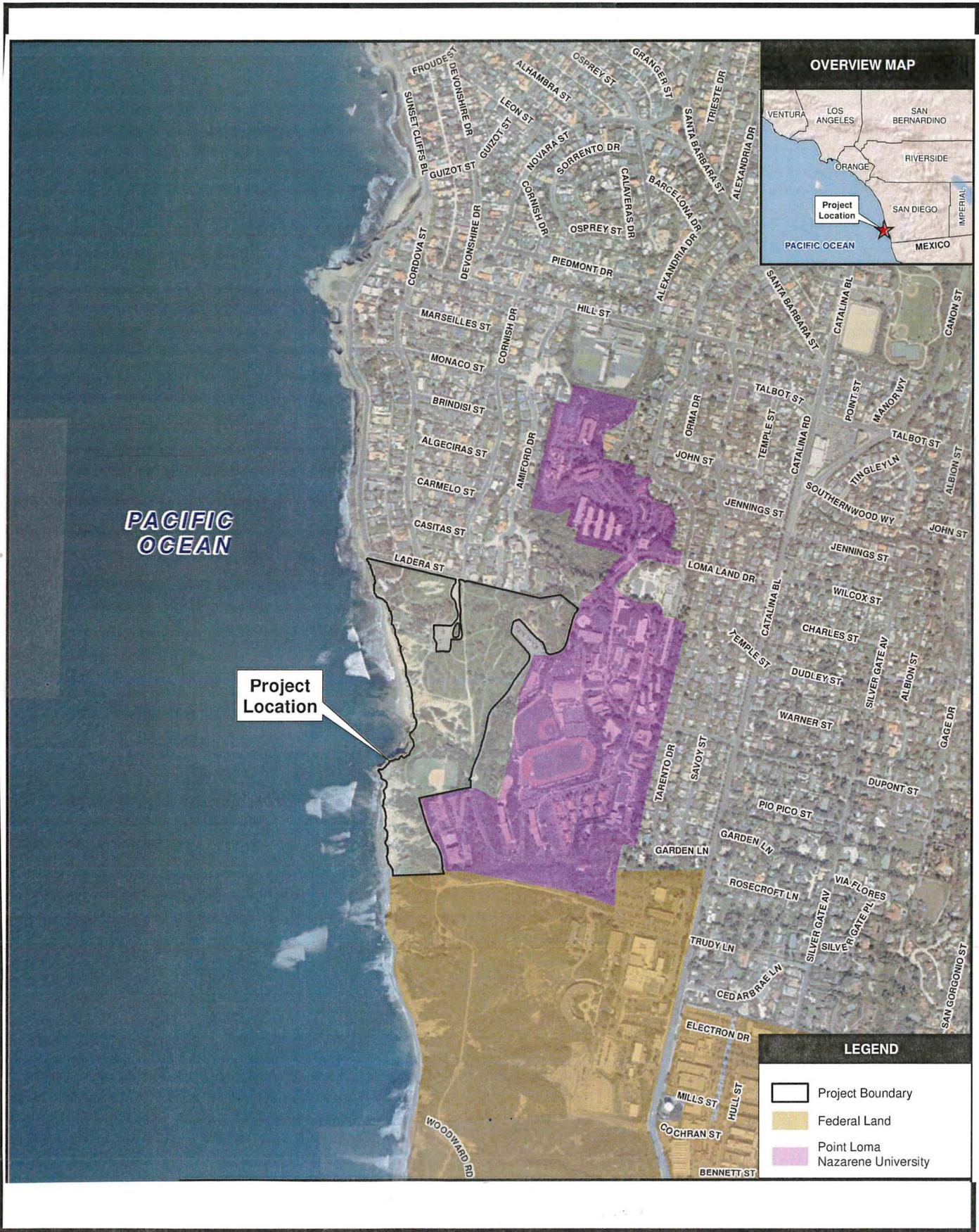
Copies of the Sunset Cliffs Natural Park - Hillside Park Section Project Findings, Initial Study, Mitigation Monitoring and Reporting Program and any technical appendices (except cultural resources confidential appendices) along with the Sunset Cliffs Natural Park Master Plan MEIR (LDR No. 91-0644), may be reviewed in the offices of the Advanced Planning and Engineering Division of Development Services Department via prior appointment, or purchased for the cost of reproduction.

  
Cathy Winterrowd, Interim Deputy Director  
Development Services Department

October 24, 2013  
Date of Final Report

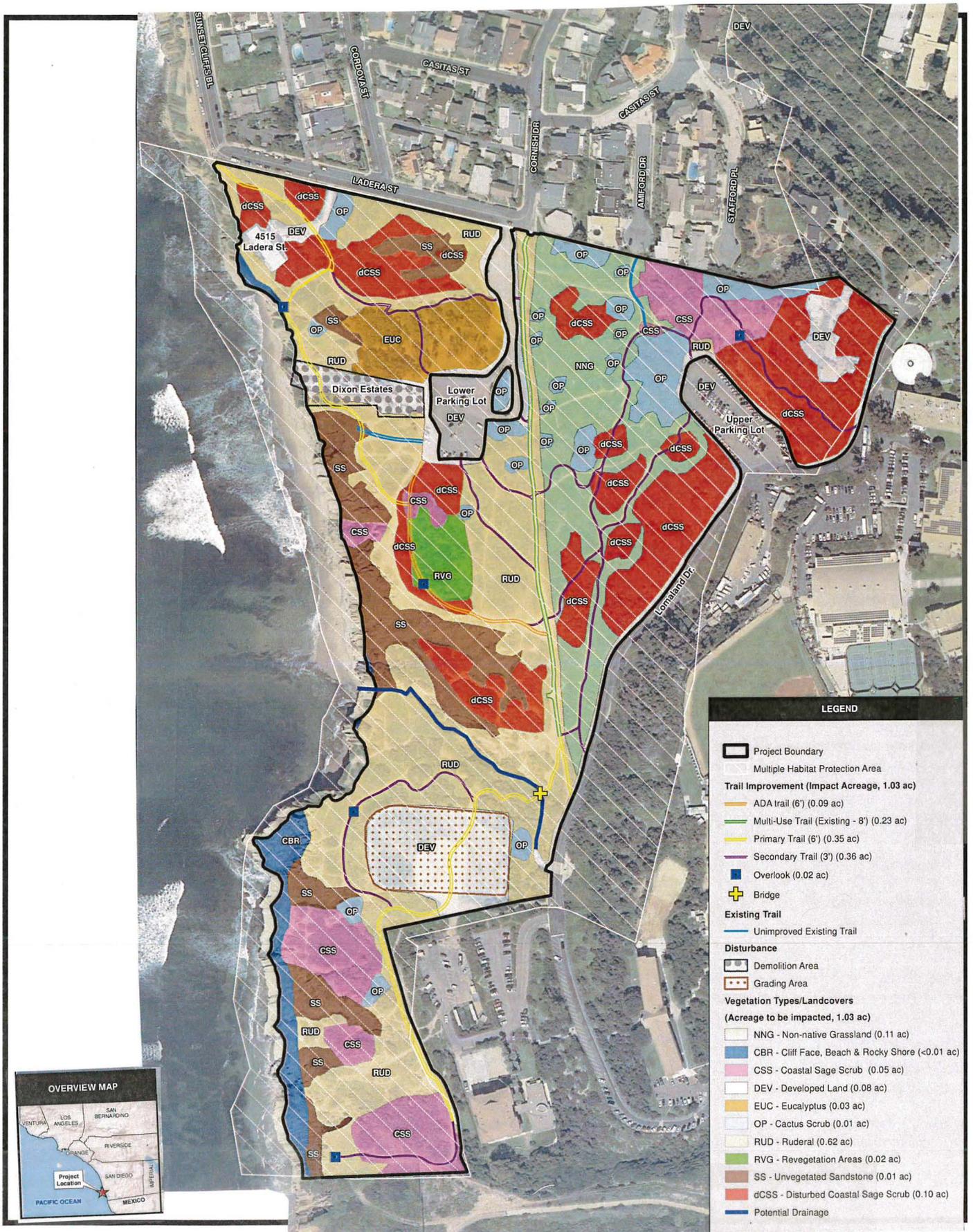
Analyst: Myra Herrmann

Attachments:           Figure 1 - Location Map  
                              Figure 2 - Site Plan  
                              Figures 3 & 4 - Revegetation/Restoration Plan  
                              Initial Study Checklist  
                              Sunset Cliffs Natural Park Master Plan MEIR Conclusions



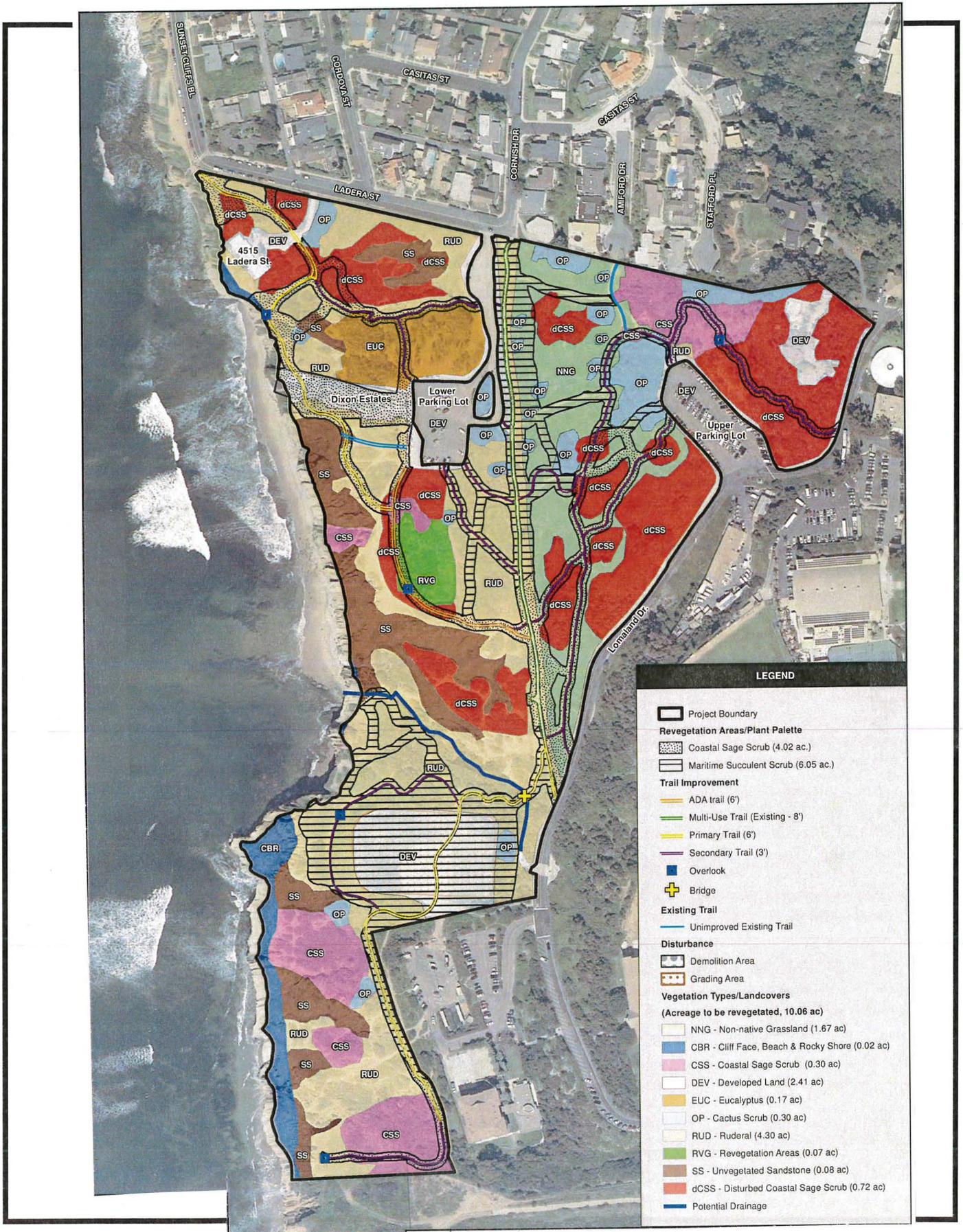
**LOCATION MAP - SUNSET CLIFFS NATURAL PARK  
 HILLSIDE TRAIL IMPROVEMENTS /Project No. 236548  
 City of San Diego – Development Services Department**

**FIGURE  
 No. 1**



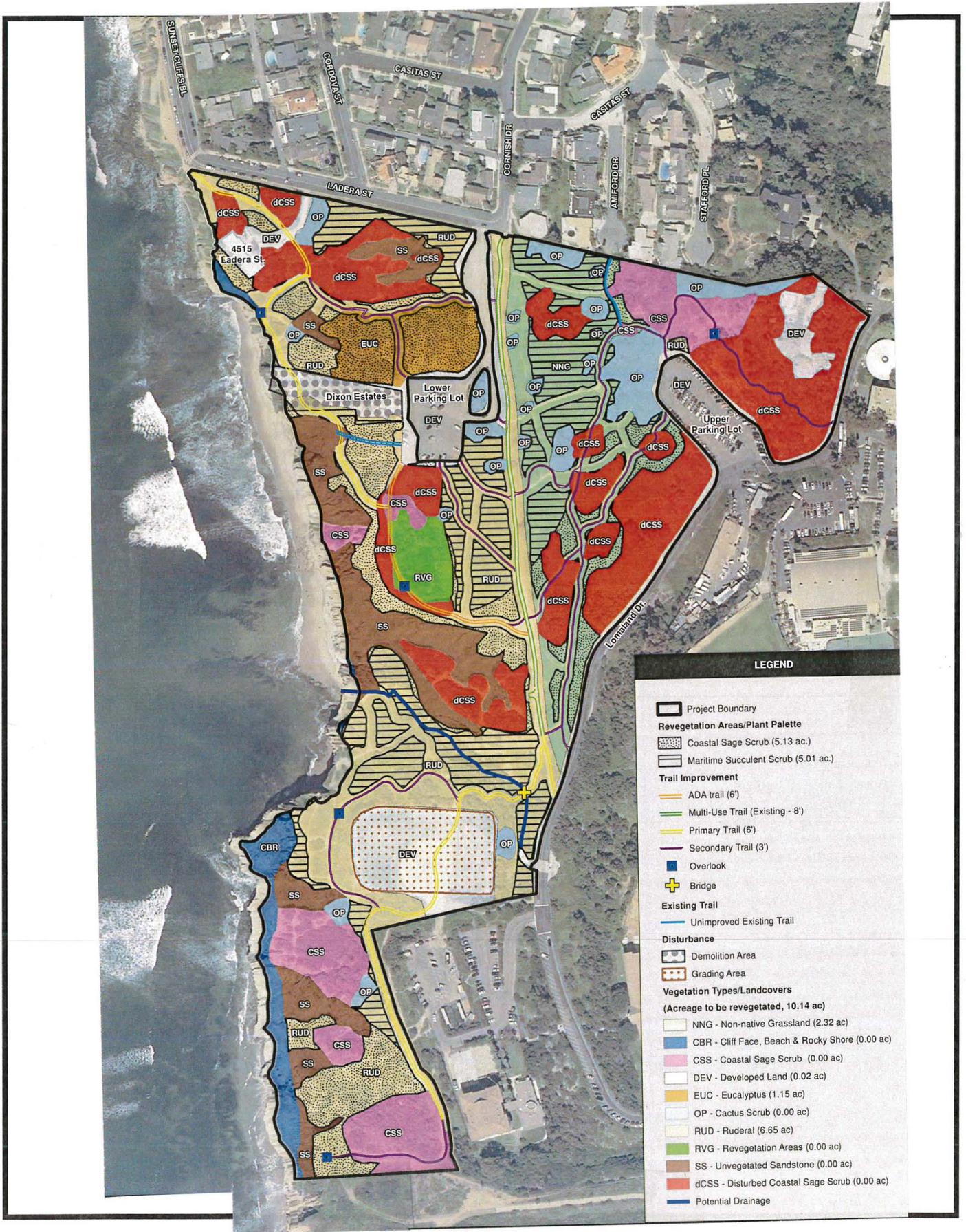
**SITE PLAN - SUNSET CLIFFS NATURAL PARK**  
**HILLSIDE TRAIL IMPROVEMENTS /Project No. 236548**  
 City of San Diego – Development Services Department

**FIGURE**  
**No. 2**



**REVEGETATION/RESTORATION PLAN - SUNSET CLIFFS  
NATURAL PARK HILLSIDE TRAIL IMPROVEMENTS**  
Project No. 236548  
City of San Diego – Development Services Department

**FIGURE  
No. 3**



**REVEGETATION/RESTORATION PLAN - SUNSET CLIFFS  
NATURAL PARK HILLSIDE TRAIL IMPROVEMENTS**  
Project No. 236548  
City of San Diego – Development Services Department

**FIGURE  
No. 4**

## INITIAL STUDY CHECKLIST

1. Project Title/Project Number: SUNSET CLIFFS NATURAL PARK HILLSIDE SECTION IMPROVEMENTS PROJECT/236548
2. Lead agency name and address: City of San Diego  
1222 First Avenue, MS501  
San Diego, CA 92101
3. Contact person and phone number: Myra Herrmann/ (619) 446-5372
4. Project location: Sunset Cliffs Natural Park is bordered to the north by the intersection of Ladera Street and Sunset Cliffs Boulevard; to the west by the Pacific Ocean; to the east by residential homes and Point Loma Nazarene University; and federal land managed by the U.S. Navy to the south.
5. Project Applicant/Consultant name and address: City of San Diego, Public Works- Engineering and Capital Projects Dept.  
525 B Street, San Diego, CA 92101  
Joe Diab, Project Manager (619) 533-4615
6. General Plan designation: Open Space Park
7. Zoning: Open Space (OS), Environmentally Sensitive Lands (ESL)
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.):

SITE DEVELOPMENT PERMIT (SDP) and COASTAL DEVELOPMENT PERMIT (CDP) to allow for the improvement of a pedestrian trail system, associated appurtenances and observation points, implementation of a phased revegetation program, removal of non-native vegetation and re-contouring and revegetation of the former ball field within the Hillside Section of the Sunset Cliffs Natural Park (SCNP) south of Ladera Street. Trail improvements include use of stabilized decomposed granite (DG) to the existing 8-foot sewer easement access path and will comply with American with Disabilities Act (ADA) accessibility requirements and will also provide bicycle access through the park. Primary trails (up to 6 feet wide) will be improved with natural surfacing (or DG as necessary to create a stable pathway) to connect various park uses, link observation points and link the park to the surrounding community. Secondary trails (up to 3 feet wide) will be improved with natural surfacing, and an ADA trail would be created to allow access from the lower parking lot to an observation point. The secondary and tertiary trails not part of the planned trail system will be restored with native vegetation to match the surrounding native vegetation. Additionally, a new drainage swale, vegetated with native plants will be created on the slope above the new multi-

use trail to reduce the amount of runoff crossing the trail from the hillside above. The project also includes removal of the concrete slab remaining from demolition of the burnt down southern Ladera Street properties and revegetation of the area with native plants. The site is not included on any Government Code listing of hazardous waste sites.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The project is located within the Hillside Section of Sunset Cliffs Natural Park at the intersection of Sunset Cliffs Boulevard and Ladera Street. The Hillside Section is bound by natural cliffs and the Pacific Ocean on the west, to the north by the intersection of Ladera Street and Sunset Cliffs Boulevard; to the west by the Pacific Ocean; to the east by single-family residential land uses and Point Loma Nazarene University; and federal land managed by the U.S. Navy to the south.

The surrounding area is designated and developed with single-family residences except for Point Loma Nazarene University to the east, federal land managed by the U.S. Navy to the south and the Pacific Ocean to the west. The project site is within the Multiple Species Conservation Program/Multi-Habitat Planning Area (MSCP/MHPA).

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.): Not applicable for this project.

**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.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Greenhouse Gas Emissions                 | <input type="checkbox"/> Population/Housing                            |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Air Quality                        | <input type="checkbox"/> Hydrology/Water Quality                  | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Biological Resources    | <input checked="" type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic                        |
| <input checked="" type="checkbox"/> Cultural Resources      | <input type="checkbox"/> Mineral Resources                        | <input type="checkbox"/> Utilities/Service System                      |
| <input type="checkbox"/> Geology/Soils                      | <input type="checkbox"/> Noise                                    | <input checked="" type="checkbox"/> 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.

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

I) AESTHETICS – Would the project:

a) Have a substantial adverse effect on a scenic vista?

The project would not have an adverse effect on scenic coastal resources or obstruct views through the park from any offsite public vantage points. The project has been designed to be consistent with the Peninsula Community Plan, the Sunset Cliffs Natural Park Master Plan and all applicable Municipal Code requirements.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

See Ia above. The project would comply with all requirements of the Municipal Code and Sunset Cliffs Natural Park Master Plan and no impacts to scenic resources have been identified.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

The project would remove non-native/invasive vegetation and restore native habitat in otherwise disturbed areas of the Sunset Cliffs Natural Park Hillside Section. The project would enhance but not degrade the existing visual quality of the site viewed and improve visual quality of the area as viewed from the surrounding areas.

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

Implementation of the project would not require installation of lighting or features that would result in glare. In addition, no substantial sources of light would be generated during project construction, as construction activities would occur only during daylight hours.

II) AGRICULTURAL AND FOREST 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

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

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) Converts 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?

The Peninsula Community Plan designates the project site for open space/park use. Agricultural land is not present on the site or in the general site vicinity and is zoned open space/environmentally sensitive lands. Therefore, the project would not result in the conversion of prime farmland, unique farmland, or farmland of statewide importance (farmland).

- b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

Refer to IIa.

- 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))?

Refer to IIa. The project is consistent with the Peninsula Community Plan and the Sunset Cliffs Natural Park Master Plan and would not result in the rezoning of forestland or timberland, as neither is present on the site or in the general vicinity.

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

Refer to IIc.

- e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to

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

non-agricultural use or conversion of forest land to non-forest use?

The project would not involve any changes that would affect or result in the conversion of Farmland or forestland to non-agricultural or non-forest uses. The project is consistent with the land use and park plans for the area. Refer to IIa - II.d.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations - Would the project:

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

The project would require ground disturbance using small construction equipment to improve existing trails and implement a revegetation plan for disturbed areas in the Hillside Section of the park. Therefore, the project would not negatively impact goals of the applicable air quality plan as the use would not be in conflict with or obstruct implementation of the Regional Air Quality Strategy (RAQS) or the State Implementation Plan (SIP).

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The project requires ground disturbance using small construction equipment to improve existing trails, remove non-native vegetation and implement a revegetation program for disturbed areas in the Hillside Section of the park, as well as install observation points and remove remnants of a burned-out abandoned building on the west side of the project area. The project would not violate any air quality standard or contribute to an air quality violation. Standard Construction Site Best Management Practices would be implemented in accordance with the Municipal Code and Storm Water Standards to reduce dust levels during construction-related activities, and therefore no impacts would result and no mitigation is required.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The County is non-attainment under federal standards for ozone (8-hour standard). The

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

project would improve existing pedestrian trails within a City open-space park, remove non-native vegetation, implement a native revegetation program as well as install observation points throughout the park. Construction would generate short-term criteria pollutants; however, construction emissions would be temporary, and implementation of BMPs would reduce potential impacts related to construction activities. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards.

- d) Create objectionable odors affecting a substantial number of people?

Due to the limited duration of the construction and the relatively small amount of construction equipment required to implement the project, nearby residents would not be exposed to substantial pollutant concentrations. The most localized impact would come from dust generated during construction. Dust control measures mandated by the City would maintain dust at levels that would not significantly impact nearby residents.

IV. BIOLOGICAL RESOURCES – Would the project:

- a) Have substantial adverse effects, 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 Game or U.S. Fish and Wildlife Service?

The project site is within a City-owned open space park with native and non-native vegetation, steep hillsides, coastal bluffs and an existing pedestrian and bicycle trail system. An existing 8-foot-wide sewer easement used as the main trail and park entrance off Ladera Street traverses the park. A Biological Survey was conducted and a report prepared for the project by URS Corporation (April 2013) which identified Tier I-IIIB habitats within the park as well as disturbed, developed and ruderal areas. The entire Hillside Section is mapped within the City's Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA). Most impacts associated with the Project would occur in non-native, disturbed vegetation or developed areas. Small construction equipment would be used to facilitate construction of trails and other park improvements. Impacts to Tier I-IIIB habitat would result from ground disturbing activities necessary for project implementation. Additionally, in accordance with the MEIR MMRP, any special status plant species will be avoided by flagging individual plants as indicated in Table 3 of the Biology Report within 20 feet of proposed construction activities to alert crews of their presence. All impacts can be mitigated in accordance with the ratios identified in Table 3 of the City's Biology Guidelines and the MSCP Subarea Plan (1997) and as further detailed in Table 5 of the Biology Report. The project would not result a substantial adverse effects as all direct impacts can be

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

mitigated to below a level, consistent with the mitigation requirements contained in the adopted MEIR for the SCNPMP.

In addition, a Brush Management Zone (BMZ) is located along the northeastern edge of the Hillside Section adjacent to residential properties and Point Loma Nazarene University (PLNU); The project as designed complies with the City's Brush Management Regulations (BMR's) in that target non-native/invasive plant species will be removed during Phase 2 revegetation efforts as further described in the Revegetation Plan prepared for the project.

Furthermore, the project has been reviewed for consistency with the SCNPMP MEIR and all applicable mitigation requirements for potential impacts to Biological Resources.

- 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 U.S. Fish and Wildlife Service?

The project site does not support riparian habitat. However, upland habitat (Tiers I-III B) consisting of Maritime Succulent scrub (cactus scrub), unvegetated sandstone, cliff face/beach/rocky shore, coastal sage scrub and non-native grassland occur within the project boundary as further described in the Biological Resources Technical Report prepared for the project by URS Corporation (April 2013). Three sensitive plants were observed on site during field surveys conducted in 2011: *Euphorbia misera* (Cliff spurge), *Ceanothus verrucosus* (Wart-stemmed ceanothus) and *Pinus torreyana* (Torrey Pine). In accordance with the MEIR MMRP, these plant species will be avoided by flagging individual plants within 20 feet of proposed construction activities to alert crews of their presence as indicated in Table 3 of the Biology Report. The Biology Report also noted that the only special status wildlife species likely to inhabit the project area are raptors.

Although the project site contains coastal sage scrub, the coastal California gnatcatcher, a MSCP covered species has a low potential to occur because of the poor condition of the habitat within the Hillside Section of the park. This finding is consistent with the conclusions from the MEIR survey results for the same area. However, as a precaution, as part of project implementation, a qualified biologist will be required to conduct preconstruction surveys to determine presence /absence of the California gnatcatcher. In addition, the current project survey confirmed the findings of MEIR which did not identify the Quino checkerspot butterfly or the Pacific pocket mouse. These species are highly unlikely to occur in the Hillside Section due to the high degradation and isolation of potential habitat.

Construction for trails, overlooks, and associated project-related appurtenances would result in impacts to 0.28 acres of upland habitat (Tier I-III B). In accordance with the

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

MEIR, mitigation would occur through preservation of the remaining habitat on site, which meets the mitigation ratios for all habitat types. This would occur through the Phase 1 revegetation of mostly disturbed areas as identified in the associated Revegetation Plan (URS 2013) with native plant species consisting of both container species and hydroseed as specified on the approved "Exhibit A" (Landscape Plan Sheets). A native plant palette has been reviewed and approved by DSD in concept and will be further evaluated when formal revegetation specifications are submitted for review prior to issuance of a notice to proceed for start of work.

A total of 10.09 acres of Tier I and II habitats would be restored from developed areas (the Dixon Estates and ball field), ruderal habitat, non-native grassland, and other areas. These other areas include disturbed areas identified as "developed" outside of the existing homes and ball field, the trail through the eucalyptus trees, and areas of native vegetation that might be impacted by the trail improvements which would be restored back to native habitat (Figure x). As a result, a net increase of 6.96 acres of sensitive vegetation (Tiers I, II and IIIB) at SCNP would occur with Phase 1. A total of 10.14 acres of Tier I and II habitat would be gained by revegetating ruderal, non-native grassland, and eucalyptus trees during Phase 2 of the revegetation effort to Tier I maritime succulent scrub and Tier II coastal sage scrub representing a net increase of 7.71 acres of sensitive vegetation with Phase 2 (Figure x). After Phase 2, the 37.95 acre Project site should support 34.78 acres of Tier I and Tier II habitat for a total net increase of 14.67 acres.

Impacts resulting from the Project are more than adequately mitigated by the preserved habitat and Phase 1 revegetation effort. Phase 2 revegetation would result in excess habitat (7.71 acres) that can be used for future mitigation needs of projects consistent with the MEIR. The project would not require additional mitigation measures in this category other than project conformance with the MSCP/MHPA Land Use Adjacency Guidelines.

- 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?

One small drainage was identified in the MEIR and confirmed during updated surveys for the current project. This drainage has been identified as a Water of the U.S. and CDFW jurisdictional. The drainage would be crossed by a secondary trail using a bridge designed specifically to avoid potential impacts to the drainage. Therefore, no wetland or riparian impacts would occur and no mitigation is required.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife

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

species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Although the entire project is within the City's MSCP/MHPA, it is isolated from other native habitats, with the Pacific Ocean on the west and a developed urbanized residential neighborhood on the north and east. Although urban wildlife such as skunks, opossums, and the occasional raccoon can often be seen in the surrounding neighborhood, the SCNP is not part of a regional wildlife corridor, but it is directly adjacent to good quality maritime succulent scrub and southern coastal bluff scrub along the southernmost boundary of the Park on property managed by the U.S. Navy. A chain-link fence separates the southern boundary of SCNP from the U.S. Navy property. Based on findings from the original MEIR analysis and the current biological survey, SCNP does not function as, nor does it appear to be part of a larger wildlife movement corridor or linkage.

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

The project would comply with all local policies and ordinances protecting biological resources. In addition to required biological mitigation measures under CEQA, the project would implement a revegetation plan and restore disturbed and previously developed areas of the park with native plant species in accordance with the approved Revegetation Plan.

- 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 not be in conflict with any local, regional or state conservation plans.

V. CULTURAL RESOURCES – Would the project:

- a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?

The purpose and intent of the Historical Resources Regulations of the Land Development Code (LDC) (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that before approving discretionary projects, the Lead Agency must identify and examine the significant adverse environmental effects, which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a

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

significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Historical resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources or the City of San Diego Historical Resources Register. Historical resources include buildings, structures, objects, archaeological sites, districts, landscaping, and traditional cultural properties possessing physical evidence of human activities that are typically over 45 years old, regardless of whether they have been altered or continue to be used. Pursuant to Section 21084.1 of the State CEQA Guidelines, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

Review by Historical Resource Board (HRB) Staff is required for any structures over 45 years old with a determination valid for 5 years. The project description in the adopted MEIR included demolition of the property located at 4515 Ladera Street, which is located at the northwest edge of the Hillside Section. However, as part of the current review process and because the prior evaluation was over five years old, HRB staff requested an updated evaluation in accordance with the Historical Resources Regulations in order to determine if the property now meets the criteria for local designation. A Historical Resources Technical Report was prepared by Scott Moomjian, Attorney at Law (March 2013) which concluded that the residence is architecturally significant because it embodies the distinctive characteristics of a style, type, period and method of Modern Post and Beam construction; and represents the notable work of "master" architect Richard John Lareau. As such, the property is automatically eligible for designation in accordance with the Historical Resources Regulations, and if designated would require a Site Development Permit and deviation findings to allow for the demolition. In order to avoid impacts to a potentially significant historical resource, the project was redesigned and the proposed trail was relocated and the revegetation planned for this area after demolition was modified. Therefore, avoidance through redesign reduces potential impacts to less than significant.

Archaeological resources are discussed further in V.b., below.

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

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

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. The entire SCNP was previously surveyed in accordance with the SCNP Master Plan - MEIR (No. 91-0644) and again in 2012 by URS Corporation and Red Tail Monitoring and Research, Inc., in order to evaluate trail and restoration/revegetation efforts relative to existing recorded sites within the park and to update survey and records search information in accordance with the Historical Resources Guidelines. The 2012 URS survey relocated recorded sites and provided guidance for realignment in order to avoid direct impacts from trail improvements and revegetation efforts. As a result of project redesign, direct impacts to all relocated sites have been avoided and only monitoring is required in areas within close proximity to reduce potential indirect impacts.

One recorded prehistoric site (CA-SDI-20732) however would result in direct impacts from trail improvements and revegetation efforts. As a result, in accordance with the Historical Resources Guidelines, direct impacts to a recorded archaeological site require implementation of a testing program to determine significance and eligibility for local designation. In June 2012, a testing program was conducted by URS staff and a Native American Monitor/Observer from Red Tail Monitoring and Research Inc., which required five (5) shovel test pits (STP's) placed within the project footprint. The testing program resulted in the identification of two loci comprised entirely of shell debris and one single bone fragment (Locus 1). In accordance with State law regarding human remains discoveries, all protocol were followed in an effort to positively identify the bone fragment, which was subsequently examined by a forensic consultant and determined not to possess any identifiable morphology to conclude if the bone was human or animal. Testing also concluded that the site does not meet the definition of a significant historical resource under CEQA or the City's Significance Thresholds and is not eligible for listing on any local, state or register. Specifically, as evaluated, SDI-20732 meets the definition of an isolated shellfish processing station which is considered a non-significant resource type in the Historical Resources Guidelines.

Qualified City staff reviewed the prior archaeological reports and all current evaluations and concluded that the project as designed would not result in direct impacts to historical archaeological resources as defined in CEQA and the City's Historical Resources Regulations and Guidelines; however, in accordance with the MEIR and City requirements, because the potential for impacts to unknown resources could result from construction-related activities in proximity to recorded sites, archaeological and Native American monitoring is required.

- c) Directly or indirectly destroy a unique paleontological resource or site or unique

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

geologic feature?

According to the MEIR, geology of the Hillside Section of SCNP is generally composed of tilted Cretaceous-aged marine sandstones, siltstones and claystones overlain by flat-lying Pleistocene-aged nearshore marine sandstones, fluvial/alluvial/Aeolian sandstones and paleosols. The MEIR provides a comprehensive discussion of the existing geological conditions within the park Chapters IV-B and IV-G; specifically, the Hillside Section is underlain in layer-cake sequence Pleistocene Terrace Deposits, the Bay Point Formation, the Lindavista Formation, and Cretaceous Marine deposits of the Point Loma Formation. Artificial fill materials are also found in various areas of the Hillside Section used to fill in a large canyon.

The MEIR identified specific areas within the Hillside Section which have a high potential for impacting fossil resources also identified in the City's CEQA Significance Thresholds (2012) as with high and/or moderate fossil resource potential. According to the MEIR, implementation of improvements such as clearing, grubbing and preparation of soil for revegetation efforts within the Hillside Section as well as construction of observation points at key locations within or in the vicinity of the Bay Point or Point Loma Formations require monitoring during construction-related activities. This is also especially important in certain areas, with shallow grading, when a site has been previously graded, when formations are present at the surface and/or when fossil localities have been recorded on-site or in the vicinity. Although implementation for trail and park improvements as well as revegetation efforts would require minimal amounts of ground disturbance monitoring as noted above is required in accordance with the MEIR.

- d) Disturb any human remains, including those interred outside of formal cemeteries?

No cemeteries, formal or informal, have been identified on the project site. However, because the Hillside Section of SCNP contain recorded prehistoric sites, there is a potential for encountering human remains during project construction activities. Therefore, pursuant to CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5), if human remains are discovered during construction, work would be required to halt in that area and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains by the County Coroner in consultation with qualified City staff or a qualified archaeological consultant.

VI. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to 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

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

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.

Geologic risks within the City of San Diego have been mapped in the City's Seismic Safety Study (1995), which indicates potential locations for faults, unstable slopes, ground failures, unstable coastal bluffs and other terrain conditions. The Hillside Section is located within geologic hazard categories (GHC) 43 (generally unstable, unfavorable jointing, localized high erosion); 44 (moderately stable, mostly stable formations, localized high erosion; 52 (other level areas, gently sloping to steep favorable geologic structure, low risk); and 53 (level or sloping terrain, unfavorable geologic structure, low-moderate risk). According to the MEIR, an east-west tending fault, shown generally parallel to Ladera Street in the Hillside Section is classified as not active because it does not offset Quaternary-age deposits.

Consistent with MEIR Mitigation Measure GEO-1, the Hillside Section trail improvements project was reviewed against geologic hazard maps to ensure that none of the project components (trails, observation points or revegetation areas) are located in close proximity to coastal bluff edges characterized as potentially unstable. Specifically the project would be required to utilize proper engineering design and standard construction practices satisfactory to the City Engineer which will be verified during the city-wide plan check processing to ensure that the potential for impacts from local/regional geologic hazards would be less than significant.

- ii) Strong seismic ground shaking?

See VI a-i above. Trail improvements and revegetation efforts would be required to utilize proper engineering design and standard construction practices satisfactory to the City Engineer. These project requirements would be verified during review of construction-level landscape and revegetation plans and would ensure that the potential for impacts from seismic ground shaking would be less than significant and no mitigation measures are required.

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

See VIa and b above. The risk of liquefaction is considered to be low; however, the Hillside Section is located in an area where existing gully, rill and sheet erosion has occurred. These characteristics are not necessarily a liquefaction factor and not interfere with project implementation. The project would be required to utilize proper engineering design and standard construction practices which would be verified by qualified staff during Citywide plan check processing of construction-

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

level documents for any park improvements which require issuance if a grading permit and approval by the City Engineer. Review would ensure that the potential for impacts from seismic-related ground failure, including liquefaction would be less than significant.

- iv) Landslides?

According to the City's Seismic Safety Study Map, the Hillside Section is located within geologic hazard categories (GHC) 43 (generally unstable, unfavorable jointing, localized high erosion); 44 (moderately stable, mostly stable formations, localized high erosion; 52 (other level areas, gently sloping to steep favorable geologic structure, low risk); and 53 (level or sloping terrain, unfavorable geologic structure, low-moderate risk) which are not expected to have a significant potential risk for landslide (see the above responses VI.i, ii, and iii). As noted above, the project would be required to utilize proper engineering design and standard construction practices satisfactory to the City Engineer which would be verified during the city-wide plan check process to ensure that the risk for landslide would be less than significant.

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

In accordance with MEIR Mitigation Measure GEO-4 the project has been reviewed by qualified Engineering staff in the Transportation & Storm Water Department for compliance with the recently adopted MS4 Permit Conditions with respect to Best Management Practices (BMP's) for construction and operational erosion control associated with trail improvements and other project components. Specifically the project would be required to utilize proper engineering design and standard construction practices satisfactory to the City Engineer which will be verified during the city-wide plan check processing to ensure that soil erosion would be minimized to a less than significant level. In addition, MEIR Mitigation Measure GEO-5 identifies the need for review of grading, demolition and development plans to determine compliance with BMP's identified in the project SWPPP which will be prepared as a requirement of the NPDES Construction Activity Storm Water Permit; this has been completed as part of the development review process as further described in the Hydrology and Water Quality Technical Reports prepared by Nasland Engineering (January 2013) for the project. Specifically, the project, which does not include new impervious surfaces includes a native revegetation plan, bioswales and a site drainage system adjacent to the multi-use & ADA trails to support the park improvements loss of topsoil; rather, the project is intended to reclaim disturbed and unvegetated areas which will aid in reducing soil erosion; therefore no mitigation is required.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a

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

result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

According to the City's Seismic Safety Study Map (1995), the Hillside Section is located within geologic hazard categories (GHC) 43 (generally unstable, unfavorable jointing, localized high erosion); 44 (moderately stable, mostly stable formations, localized high erosion); 52 (other level areas, gently sloping to steep favorable geologic structure, low risk); and 53 (level or sloping terrain, unfavorable geologic structure, low-moderate risk). The project area within the Hillside Section is underlain by the steep gullied land; Reiff fine sandy loam; Marina loamy course sand; and urban land complex. These soil types are not considered susceptible to seismically induced liquefaction or settlement. The nearest active regional fault is the Rose Canyon Fault, located approximately 5 miles north and east of the site. The project would be required to utilize proper engineering design and standard construction practices which would be verified during final review of construction-level landscape and revegetation plans to ensure that the potential for impacts from regional geologic hazards 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?

The project area within the Hillside Section is underlain by the steep gullied land; Reiff fine sandy loam; Marina loamy course sand; and urban land complex. These soil types are not considered susceptible to seismically induced liquefaction or settlement. Soil expansion on-site is expected to be low considering that the project involves only trail improvements, construction of observation points and implementation of a native revegetation program. Compliance with all required/standard construction practices for observation points and trail improvements would preclude any significant impacts.

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

No septic or alternative wastewater systems are proposed. The project site is located within an area that is already developed with existing infrastructure (i.e., municipal water, sewer and storm water facilities) which will not be affected by the project.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

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

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

The State of California has passed a number of policies and regulations that are either directly or indirectly related to greenhouse gas emissions (GHG). Notably, the California legislature passed AB32 (Nunez), the “California Global Warming Solutions Act of 2006”. It requires the California Air Resources Board (CARB) to adopt rules and regulations that would reduce GHG emissions to 1990 levels by year 2020. The CARB is also required to publish a list of discrete GHG emission reduction measures. SB 375 requires CARB to set regional targets for GHG emissions. Its purpose is to reduce emissions by promoting high-density, mixed-use developments around mass transit hubs. SB 375 requires that Metropolitan Planning Organizations (MPOs) in California update their Regional Transportation Plans (RTPs) to promote this smart growth development.

Lastly, SB 97, signed by the governor on August 24, 2007, required that the CEQA guidelines be amended to address impacts from transportation and energy consumption and appropriate mitigation for GHG emissions, and requires the Resources Agency to certify and adopt those guidelines by January 1, 2010. Those guidelines took effect on March 18, 2010.

Quantitative GHG Thresholds of Significance for CEQA have not been adopted by the State of California, City of San Diego or San Diego County Air Pollution Control District. Therefore, the City of San Diego is utilizing the California Air Pollution Control Officers Association (CAPCOA) report “CEQA & Climate Change” dated January 2008 as an interim screening criteria to determine whether a GHG analysis would be required. Based on the City of San Diego’s Memorandum Addressing Greenhouse Gas Emissions from Projects Subject to CEQA (August 2010), a 900 metric ton screening criteria for determining when a GHG analysis is required and is based on available guidance from the CAPCOA white paper. If a project exceeds the 900 metric ton criteria, the project would be required to demonstrate a 28.3% reduction to the CARB 2020 “business-as-usual” forecast model which represents the GHG emissions that would be expected to occur without any GHG project reducing features or mitigation, consistent with AB 32. A project of 50 residential units or more would be expected to meet the screening criteria and no additional reduction measures would be required. In this case, construction-related grading for trail improvements, observation points and revegetation do not fall into a category requiring a GHG analysis. However, information was provided by the applicant that addresses types of equipment to be used during construction, and the limited amount of emissions that would be generated (85 metric tons), which is well below the screening criteria noted above. Therefore, no further evaluation is required and the project would result in a less than significant impact related to greenhouse gas emissions associated with construction and operation activities.

- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing

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

the emissions of greenhouse gases?

The project as proposed would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emission in that it would be constructed in an established urban area with services and facilitates available. In addition, the project is consistent with the underlying zone and land use designation.

VIII. HAZARDS AND HAZARDOUS MATERIALS –

Would the project:

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

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. The potential use of these materials would be temporary in nature only for duration of the planned construction period), and the project would not routinely transport, use or dispose of hazardous materials; therefore, the potential impact is considered less than significant. In addition, one former landfill site and a small burn ash site have been identified in the Hillside Section of the park. As such, a Soil Management Plan & Community Health and Safety Plan(SMP & CHSP) has been prepared and incorporated into the project which would be implemented during construction-related activities in proximity to, or within known burn ash or landfill areas. Oversight for the SMP & CHSP will be provided by qualified staff in the City's Environmental Services Department and Local Enforcement Agency.

- 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?

As discussed in VIII.a, the project would not involve the use or transport of substantial amounts of hazardous materials. However, as noted above, existing burn ash and/or former landfill soils in areas of the Hillside Section could be encountered during construction-related activities. In those instances, the SMP & CHSP as noted above would be implemented with oversight by qualified City staff to assure that the project would not create a significant hazard to the public or the environment.

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

As discussed in VIII.a, the project would not involve the use or transport of substantial amounts of hazardous materials. However, as noted above project components are located

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

within or in close proximity to areas where an existing burn ash and landfill site have been documented. These localities are located within ¼-mile of the Point Loma Nazarene University; however, implementation of and strict adherence to the SMP & CHSP would assure that the project would not create a significant hazard to schools in the area.

- 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?
- 

The MEIR identified the location of one burn ash site within in the northern portion of the Hillside Section near Ladera and Cordova Streets, and one landfill site contained within an eroded canyon near the former athletic field. Concurrent with distribution of the MEIR in 2004, the former Integrated Waste Management Board (now referred to as Calrecycle) completed a Final Site Investigation Report on the burn ash site which concluded that the site contained concentrations of lead, but is limited to the current recorded location. The report further concluded that the majority of the material in the burn ash site is non-hazardous, except for the lead which is considered a California hazardous waste. The report offered two clean-up scenarios, either clean closure or cap and cover with clean fill and revegetate the area with native plant species. The Hillside Section improvements includes the revegetation of this area with native plants and implementation of the SMP & CHSP with oversight by the City’s LEA and ESD as noted above which is consistent with the mitigation requirements contained in the MEIR for this area (PS-1). The MEIR further identified measures to address the landfill area proximate to the former athletic field and the eroded canyon. This locality is monitored and inspected annually by the City’s LEA who also reviewed provided guidance on the project components in this area. The current project only involves construction to recontour and restore the former athletic field. As such, construction in this area, which is adjacent to the former landfill would also require implementation of the SMP & CHSP to assure that any landfill-related soil or debris is treated in accordance with the all applicable local, state and federal requirements for hazardous waste sites. Strict adherence with the contract specifications and the SMP & CHSP would reduce potential impacts to below a level of significance.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- 

The San Diego International Airport (Lindbergh Field) and North Island Naval Air Station are both located approximately 2-3 miles east and south, respectively from the project site. The flight path for Lindbergh Field is located further north and east of this

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

area although planes can be seen as they pass over Point Loma and bank to the south over the Pacific Ocean. The flight path for North Island is south of the project area with take-off from the north end of Coronado parallel to Point Loma, then out and over the Pacific Ocean. The project would not result in any impacts related to public safety associated with airports.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project site is not within proximity of a private airstrip.

- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- |                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

This project is consistent with the adopted land use plan and park Master Plan and therefore, would not interfere with the implementation of or physically interfere with an adopted emergency response plan or evacuation plan.

- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project site is within a Very High Fire Hazard Zone in an open space park within the MHPA. The majority of the Hillside Section contains sensitive coastal vegetation and non-native grassland habitat as well as disturbed and ruderal habitat. Under the Brush Management Regulations, new development within or adjacent to fire hazard zones would be required to conduct specific brush management clearing or thinning. However, because this project also includes restoration of ruderal and disturbed habitat to native upland habitat, along with revegetation of as a result of trail improvements, the project in and of itself serves to reduce the risk wildland fire in this area. Strict adherence to the revegetation/restoration plan in accordance with related permit conditions would preclude the potential for significant impacts associate with wildland fires and therefore no mitigation beyond what is provided for and detailed under Biological Resources is required.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

- a) Violate any water quality standards or waste discharge requirements?
- |                          |                          |                                     |                          |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

A Water Quality Technical Report (WQTR) was prepared for the project (Nasland Engineering, January 2013) which is located in the Pueblo San Diego Hydrologic Unit (908.00) and the Point Loma Hydrologic Area (908.10). Runoff from the site currently sheet flows from east to west toward the cliffs via natural drainage courses and drains directly into the Pacific Ocean through one existing storm drain outfall adjacent to the existing parking lot. Therefore, the project has the potential to generate sediment from runoff and soil erosion which could reach the Pacific Ocean to the west.

According the Regional Water Quality Control Board, downstream water bodies include the Pacific Ocean Shoreline at the Point Loma HA and is identified as a Water Quality Sensitive Area in the City's Storm Water Standards Manual, but is not listed as a Section 303d list of impaired water bodies. There are no pollutants of concern identified in the WQTR for this project. However, in order to protect the proposed trail improvements and lengthen the time of concentration for storm water runoff, vegetated bio-swales and a storm drain system have been incorporated into the project. The system has been designed to comply with the City's Storm Water Standards and would not be subject to the "Priority Development Project" requirements of the previous MS4 Permit issued by the Regional Water Quality Control Board (R9-2007-001), but is subject to the general requirements under the "Development Planning Component" of the permit. According to Staff from the City's Transportation & Storm Water Department, land development BMP requirements that were developed under the previous MS4 permit (R9-2013-0001, E.3.d) remain in effect until BMP requirements under the new MS4 Permit become effective which is anticipated to be in December 2015. As such, the project must meet the BMP requirements for the "Standard Development Projects" as described in Section 3 of the City's Storm Water Standard which when incorporated are intended to ensure that the project would not cause or contribute to a violation of water quality standards (R9-2007-0001, D.1.c).

The WQTR further outlines construction and permanent best management practices (BMPs,) including various Low Impact Development (LID) BMPs such as minimization of impervious surfaces; optimizing site layout, dispersal of runoff to adjacent landscaping BMP's, construction considerations, and use of stabilized trail surfaces. In addition, the report identifies source control BMP's associated with landscaping of any steep hillsides and use of efficient irrigation systems and landscape design; locations and maintenance of trash receptacles, and use of integrated pest management principals. The project will also implement storm water BMP's such as but not limited to labeling of all storm drain system catch basins with prohibitive "No Dumping Drains to Ocean." These measures as implemented would assure compliance with the City's Storm Water standards. Strict adherence to the requirements outlined in the WQTR in accordance with the City's Storm Water Standards satisfactory to the City Engineer would ensure that any resultant discharge from the site would be substantially free of pollutants and sediments and would preclude the potential for violating any water quality standards or

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

waste discharge requirements. Therefore, no mitigation would be required. This conclusion is consistent with the requirements outlined in the MEIR to assure that future projects are designed to preclude potential water quality impacts.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The project is located in an urban area with existing public water supply infrastructure, and groundwater is not utilized in this area. The project site does not require the construction of wells

- 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 result in substantial erosion or siltation on- or off-site?

According to the Hydrology Study (Nasland Engineering 2013), runoff from the site currently sheet flows from east to west toward the cliffs via natural drainage courses and drains directly into the Pacific Ocean through one existing storm drain outfall adjacent to the existing parking lot. The existing 50 acre area is approximately 98% pervious natural terrain with the remaining 2% being the existing paved parking area and existing roof areas of the remaining Ladera Street property. In order to protect the proposed trail improvements and lengthen the time of concentration for storm water runoff, vegetated bio-swales and a storm drain system have been incorporated into the project. The drainage system has been designed to comply with the City's Storm Water Standards and to meet current City Engineering requirements. Storm water runoff for both the existing and proposed site conditions has been calculated, analyzed and compared to assure that the proposed conditions do not negatively affect the existing hydrologic patterns. This analysis has been conducted in accordance with the City's Drainage Design Manuel and has been reviewed and approved by the City Engineer. Because the project is not creating any additional impervious surfaces, the overall runoff rates for the Hillside Section would not be increased. The Hydrology Study concluded that the project would not result in a significant change to the existing drainage patterns of the area or increase in the impervious surface area, runoff volume, velocity or frequency, nor will it significantly reduce existing infiltration rates and the existing system has the capacity to accept additional drainage from the new storm drain system;

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

therefore, impacts would remain less than significant.

- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

See IX.d. Existing drainage patterns would remain generally the same on-site. The project does not require the alteration of a stream or river as none are located on-site or in the vicinity.

- e) 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?

See IXa-d. The project would be required to comply with all storm water quality standards both during and after construction using approved Best Management Practices (BMPs) which would ensure that water quality is not degraded.

- f) Otherwise substantially degrade water quality?

As discussed in Section IX a, the project would be required to comply with the City's Storm Water Standard, satisfactory to the City Engineer and as outlined in the approved Water Quality Technical Report prepared for the project both during and after construction, using appropriate Best Management Practices (BMPs) that would ensure that water quality is not degraded. With implementation of BMPs during and after construction, impacts related to water quality would be precluded and therefore less than significant.

- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The project would not place housing within a 100-year flood hazard area.

- h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?

The project would not place structures within a 100-year flood hazard area.

X. LAND USE AND PLANNING – Would the project:

- a) Physically divide an established community?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park to reduce erosion; and would not physically divide an established community.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park to reduce erosion. The project is compatible with the area in that it is located in urbanized residential community on land designated for open space uses. In addition, the project is in an area developed with similar residential structures and therefore no conflict would occur.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park to reduce erosion. The entire Hillside Section is within MHPA and therefore adherence to the Land Use Adjacency Guidelines would be required. The project was reviewed by qualified MSCP staff for compliance with the MSCP Subarea Plan as well as the Sunset Cliffs Natural Park Master Plan. Therefore, the project would not conflict with any applicable conservation plan for the site or area.

XI. MINERAL RESOURCES – Would the project result in:

- 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 project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park which is adjacent to residential development and a private university. There are no mineral resources located on the project site and would have no impact in this category.

- 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?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park which is adjacent to residential development and a private university. There are no mineral resource recovery sites or mineral resources located on the project site and would have no impact in this category.

XII. NOISE – Would the project result in:

- a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park which is adjacent to residential development and a private university and would not create a permanent noise generating source, nor would the project be subject to such noise from the adjacent uses or streets.

- b) Generation of, excessive ground borne vibration or ground borne noise levels?

The proposed project would not generate vibration and or ground borne noise levels. The project site is not in proximity to any vibrating producing uses (i.e. freeway, airport, truck routes, and railways); however commercial flights from Lindbergh Field and Naval jets from North Island Naval Air Station fly in the vicinity of the park but the project does not create a noise condition warranting mitigation.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park and would not create a permanent noise generating source.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project?

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas

with native vegetation and improving overall conditions in the park and would not expose people to a substantial increase in temporary or periodic ambient noise levels. Some construction noise would occur during implementation of the plan and trail improvements, but would be temporary in nature. In addition, the project is required to comply with the San Diego Municipal Code, Chapter 5, Article 9.5, (§59.5.0404 Construction Noise). This section specifies that it is unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays (with exception of Columbus Day and Washington's Birthday), or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise.

- e) For a project located within 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 area to excessive noise levels?

The project site is located within two miles of a public airport or public use airport (San Diego International Airport – Lindbergh Field) and North Island Naval Air Station and is subject to FAA Part 77 review. The project site is within an open space park. Noise from commercial or naval airplanes is an existing condition in the park and surrounding neighborhood and would not be increased or exacerbated with implementation of the project.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The project site is not located within the vicinity of a private airstrip.

XIII. 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 project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park. Implementation of the project would not induce population growth nor require the construction of new infrastructure.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No such displacement would result. The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No such displacement would result. The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park.

XIV. 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 rations, response times or other performance objectives for any of the public services:

- i) Fire Protection

The project would continue to be adequately served by existing Fire Station No. 22, located at 1055 Catalina Boulevard in Point Loma, Fire Station No. 15 located at 4711 Voltaire Street in Ocean Beach and Fire Station No. 20, Located at 3305 Kemper Street, in the Midway District, all of which serve the Peninsula and Ocean Beach communities. The project would not affect existing levels of public services, and would not require the construction or expansion of a fire facility.

- ii) Police Protection

The project would continue to be adequately served by the Western Division Police Station located at 5215 Gaines Street off Friars Road which serves the neighborhoods of Hillcrest, La Playa, Linda Vista, Loma Portal, Midtown, Midway District, Mission Hills, Mission Valley West, Morena, Ocean Beach, Old Town, Point Loma Heights, Roseville-Fleetridge, Sunset Cliffs, University Heights and Wooded Area, would not affect existing levels of public services, and would not require the construction or expansion of a police facility.

iii) Schools

The project would not affect existing levels of public services and would not require the construction or expansion of a school facility.

v) Parks

Implementation of this park project would not affect existing levels of public services or require the construction or expansion of another park facility.

vi) Other public facilities

The project would implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park and would not affect existing levels of public services; therefore no new or altered government facilities would be required.

XV. 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?

This is a park project to implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park. These improvements are intended to supplement existing levels of service and those that would be expected to use the park.

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?

Refer to XVa. This is a park project to implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park, the potential adverse physical environmental effects of which are analyzed in this environmental document and thoroughly detailed under specific issue areas of this Initial Study Checklist.

XVI. TRANSPORTATION/TRAFFIC – Would the project?

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel

and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

This is a park project to implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park. This activity is consistent with the Sunset Cliffs Natural Park Master Plan and the Peninsula Community Plan designation and underlying zone. The project would not result in any permanent increases in traffic generation.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

This is a park project to implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park. This activity is consistent with the Sunset Cliffs Natural Park Master Plan and the Peninsula Community Plan designation and underlying zone. The project would not result in any permanent increase in traffic generation or decrease the level of service on the existing roadways.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

This is a park project to implement the Sunset Cliffs Natural Park Master Plan by improving trails, constructing observation points, restoring disturbed, developed or degraded areas with native vegetation and improving overall conditions in the park. This activity is consistent with the Sunset Cliffs Natural Park Master Plan and the Peninsula Community Plan designation and underlying zone. The project would not result in safety risks or a change to air traffic patterns for both Lindbergh Field or North Island Naval Air Station.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project would not create an increase in hazards resulting from design features. The project has been reviewed for compliance with applicable zones and land uses identified in the Community Plan and is located in an open space park at the end of several dead-end local streets where no such hazards currently exist.

- e) Result in inadequate emergency access?

The project is consistent with the community plan designation and underlying zone and would not result in inadequate emergency access. Existing access to the park for emergency vehicles will not be affected before, during and after construction.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The proposed project is consistent with the community plan designation and underlying zone and would not result in any conflicts regarding policies, plans, or programs regarding public transit, bicycle or pedestrian facilities.

XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The project involves improvements within an existing open space park. Wastewater consumption is not an issue with this project type. In addition, adequate services are available to serve the site.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Adequate services are available to serve the site. The project would not require the construction or expansion of existing facilities; however, the project would install a storm drain system to address storm water runoff associated with trail improvements, all of which are confined to areas within the park, outside of the developed public right-of-way.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

If needed for project implementation, adequate services are available to serve the site. The project in and of itself would not require the construction or expansion of existing facilities.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements

needed?

If needed for project implementation, adequate services are available to serve the site. The project in and of itself would not require the construction or expansion of existing facilities or new or expanded entitlements.

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

If they were needed for project implementation, adequate services are available to serve the site. The project in and of itself would not increase provider's existing commitments in the area.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Adequate services are available to serve the site, the project would not increase waste beyond existing conditions.

- g) Comply with federal, state, and local statutes and regulation related to solid waste?

The project would require limited grading in order to implement improvements detailed in the Project Description, and would be required to comply with all federal, state, and local statutes for solid waste disposal as they relate to the project. In addition, adequate services are already in place to serve the site.

XVIII. 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?

Based on review of previous surveys in the area which included the subject site, the project has a potential to result in indirect impacts to archaeological and paleontological resources requiring monitoring. The project also has a potential to result in impacts to land use (MSCP/MHPA) and biological resources, as further described in the applicable sections of this Initial Study. However, implementation of the mitigation measures identified in this Initial Study and MEIR Findings would reduce all impacts to a below level of significance. The project would also be

required to comply with the all applicable local, state and federal codes and regulations, include CDFW Code, Section 3503 and federal Migratory Bird Protection Act requirements, precluding any possible direct and/or indirect effect on nesting birds within on-site native vegetation as further detailed in the Biology Report prepared for the project.

- 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 futures projects)?
- 

The project would not have a considerable incremental contribution to any cumulative impact beyond those identified in the MEIR prepared for the Sunset Cliffs Natural Park Master Plan which were limited to Land Use, Hydrology/Water Quality, Biological Resources, Paleontological Resources, Historical Resources, and Traffic/Parking.

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

Any potential environmental effects on human beings resulting from this project would be reduced or eliminated through standard project design measures, compliance with applicable local, state or federal regulations and/or through implementation of mitigation measures detailed in the environmental document.

## INITIAL STUDY CHECKLIST

### REFERENCES

#### I. AESTHETICS / NEIGHBORHOOD CHARACTER

- City of San Diego General Plan; City of San Diego Land Development Municipal Code
- Community Plan.
- Local Coastal Plan.

#### II. AGRICULTURAL RESOURCES & 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:

#### III. AIR QUALITY

- California Clean Air Act Guidelines (Indirect Source Control Programs) 1990.
- Regional Air Quality Strategies (RAQS) - APCD.
- Site Specific Report:

#### 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 - Resource Element.
- 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 & 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 - Biological Resources Technical Report for the Sunset Cliffs Natural Park Hillside Section Improvements (April 2013), and Revegetation Plan (April 2013) both prepared by URS Corporation, Inc.; Sunset Cliffs Natural Park Master Plan MEIR.

**V. CULTURAL RESOURCES (INCLUDES HISTORICAL RESOURCES)**

- City of San Diego Historical Resources Guidelines.

- City of San Diego Archaeology Library.

- Historical Resources Board List.

Community Historical Survey:

- Site Specific Reports: Review of Sunset Cliffs Natural Park Master Plan - MEIR Archaeological Resources surveys and associated reports for projects in the vicinity (ASM Affiliates, Inc.); Results of Testing and Evaluation at SDI-20732 (December 2012) and Archaeological Treatment Plan for the Sunset Cliffs Natural Park Hillside Section Improvements (April 2013) both prepared by URS; Historical Resources Technical Report, prepared by Scott Moomjian (March 2013); Sunset Cliffs Natural Park Master Plan MEIR.

**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(s):

**VII. GREENHOUSE GAS EMISSIONS**

- Site Specific Report: GHG Memo prepared by URS for the Public Works-Engineering and Capitol Projects Department (March 2011).

**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.
- Site Specific Report: Soil Management Plan & Community Health and Safety Plan (City of San Diego, 2011); Sunset Cliffs Natural Park Master Plan MEIR.

**IX. HYDROLOGY/WATER QUALITY**

- 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, [http://www.swrcb.ca.gov/tmdl/303d\\_lists.html](http://www.swrcb.ca.gov/tmdl/303d_lists.html).
- Site Specific Report: Water Quality Technical Report (January 2013) and Hydrology Study (January 2013), both prepared by Nasland Engineering; Sunset Cliffs Natural Park Master Plan MEIR; Sunset Cliffs Natural Park Master Plan MEIR.

**X. LAND USE AND PLANNING**

- City of San Diego General Plan.
- Community Plan.
- Airport Land Use Compatibility Plan (Lindbergh Field)
- City of San Diego Zoning Maps
- FAA Determination

**XI. MINERAL RESOURCES**

- California Department of Conservation - Division of Mines and Geology, Mineral Land Classification.
- Division of Mines and Geology, Special Report 153 - Significant Resources Maps.
- Site Specific Report:

**XII. NOISE**

- 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 - San Diego Regional Average Weekday Traffic Volumes.
- San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG.
- City of San Diego General Plan.
- Site Specific Report:

**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: Sunset Cliffs Natural Park Master Plan MEIR (Geology and Paleontology Sections).

**XIV. POPULATION / HOUSING**

- City of San Diego General Plan.
- Community Plan.
- Series 11 Population Forecasts, SANDAG.
- Other:

**XV. PUBLIC SERVICES**

\_\_\_ City of San Diego General Plan.

\_\_\_ Community Plan.

**XVI. RECREATIONAL RESOURCES**

X City of San Diego General Plan.

X Community Plan.

X Department of Park and Recreation

\_\_\_ City of San Diego - San Diego Regional Bicycling Map

X Additional Resources: Sunset Cliffs Natural Park Master Plan & MEIR

**XVII. TRANSPORTATION / CIRCULATION**

\_\_\_ City of San Diego General Plan.

\_\_\_ Community Plan.

\_\_\_ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG.

\_\_\_ San Diego Region Weekday Traffic Volumes, SANDAG.

\_\_\_ Site Specific Report:

**XVIII. UTILITIES**

\_\_\_ \_\_\_\_\_

**XIX. WATER CONSERVATION**

\_\_\_ Sunset Magazine, New Western Garden Book. Rev. ed. Menlo Park, CA: Sunset Magazine.



Land Development  
Review Division  
(619) 446-5460

## MASTER ENVIRONMENTAL IMPACT REPORT

Project No. LDR 91-0644  
SCH No. 97101071

**SUBJECT:** Sunset Cliffs Natural Park Master Plan. MASTER PLAN ADOPTION to define long-range improvements for management of the Sunset Cliffs Natural Park in accordance with the goals of the Master Plan. Implementation of improvements would occur in phases based on funding availability. Project elements subject to future environmental review and permitting include a comprehensive drainage/erosion control plan, a native plant preservation and revegetation program, a system of marked pedestrian trails with observation points and signage, improved beach access, traffic and parking improvements, elimination of active use of the ballfield, and demolition of the Loma Land and Ladera Street Properties with possible retention and adaptive re-use of the Theosophical Society Cabin Corbin House if designated as an historical resource. Applicant: City of San Diego Park and Recreation Department.

*Note: Clarifying changes have been made to the Final Environmental Impact Report in response to public review and input. Deletions are indicated in ~~strikeout~~ font. Additions are indicated either in **bold** font or doubleunderline font. The City of San Diego has determined that these changes do not require recirculation of the EIR pursuant to the State CEQA Guidelines 15088.5*

This document has been prepared by the City of San Diego Environmental Analysis Section under the direction of the Development Services Department Environmental Review Manager and is based on the City's independent analysis and conclusions made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

### CONCLUSIONS:

The Draft Master Environmental Impact Report (MEIR) was prepared in accordance with the CEQA State Guidelines in Article 11.5 of the California Code of Regulations, Title 14, Chapter 3, to address the potential environmental impacts resulting from, or related to, implementation of the Master Plan for the Sunset Cliffs Natural Park.

Dedicated in 1983, Sunset Cliffs Natural Park is a 68-acre resource-based regional park stretching along the Pacific Ocean bordering the western edge of Point Loma. The 18-acre linear section of the park lies to the west of Sunset Cliffs Boulevard between Adair and Ladera Streets. The 50-acre hillside section, a designated Multi-Habitat Planning Area, links the 640-acre Point Loma Ecological Reserve beginning at the Navy property to the south.

The Master Plan addresses long-term needs to fulfill the goal to "Create a park. . . free from the effects of man. . . intended to inspire the user to reflect on the grandeur of the sea, and beauty of the cliffs that are Point Loma." Implementation of improvements would occur in multiple phases based on funding availability. Additional environmental review and permits are required.

### **PUBLIC REVIEW OF DRAFT MASTER EIR:**

The Draft Master Environmental Impact Report was submitted for a 45-day public review period from October 1, 2003 through November 14, 2003 in accordance with the State CEQA Guidelines 15087. At the request of the Sunset Cliffs Natural Park Recreation Council (the official advisory body to the City of San Diego Park and Recreation Department and Board regarding the Sunset Cliffs Natural Park Master Plan), the public comment period was extended 14 days to conclude on Tuesday, December 2, 2003 allowing additional time for the Recreation Council to meet and finalize its comments.

Sixteen comment letters containing 314 <sup>Comments</sup> were received on the draft EIR. Over half of the comments were provided by the Sunset Cliffs Natural Park Recreation Council. In accordance with the State CEQA Guidelines 15088, the City of San Diego evaluated and responded to all written comments received. Many of the comments resulted in clarifying changes as reflected in the Final EIR. Disposition of all comments is found in the Response to Comment document.

The following reflects the primary issues raised during public review:

- Parking adequacy – Several commentors noted discrepancy between the actual parking availability and the numbers identified in the Draft. As a result, additional review was conducted and the EIR corrected to reflect the actual number of parking spaces.
- Traffic/pedestrian safety – Several commentors requested further evaluation of parking lot redesign and the potential safety impacts resulting therefrom. As the Master EIR does not propose project-specific parking lot reconfiguration, a detailed analysis has been deferred once a project is proposed.
- Drainage and runoff – A primary, underlying theme in the comments is the on-going erosion and drainage issues in the Park and the disagreement among the stakeholders regarding the source and solution. As disclosed in the Draft EIR, a separate drainage study would be conducted, subject to additional environmental review, to more fully analyze and propose solutions to the erosion which is currently degrading the Park.

- Athletic field removal – Perhaps the most controversial of all impacts is the current use of the athletic field for active recreation in a passive park and Multiple Habitat Planning Area (MHPA). Agreements were reached during the process of preparing drafts of the EIR to eliminate active recreational use of the field and return it to a naturalized state in accordance with the EIR Revegetation Plan.
- Future environmental review – The EIR has identified need for future environmental review to more fully analyze the potential for impacts from future projects. Among these future environmental studies include:
  - Drainage Study
  - Erosion Control Study
  - Traffic/Parking Study
  - Biological Studies (e.g., Springtime survey, tidepool study, revegetation program)
  - Archaeological Study

Based on the results of the public review and evaluation of the comments, the responses, and the changes to the Final EIR, the City of San Diego has determined that recirculation of the EIR is not required pursuant to the State CEQA Guidelines 15088.5. The changes reflected in the final EIR provide additional clarification but do not define any new effects or impacts. Therefore, recirculation of the EIR is not required pursuant to 15088.5(b) of the State CEQA Guidelines.

#### **SIGNIFICANT IMPACTS:**

It is expected that the following significant impacts would be fully mitigated with implementation of the proposed Mitigation, Monitoring, and Reporting Program (MMRP).

Land Use: Land use considerations were evaluated for consistency with the Multiple Species Conservation Plan (MSCP), the Coastal Bluffs and Beaches Guidelines, agreements with the Point Loma Nazarene University (PLNU), the Peninsula Community Plan and Local Coastal Program and the San Diego Association of Governments Shoreline Preservation Strategy. The proposed Master Plan improvements are generally consistent with these broader land use plans. The project could conflict with an aspect of the Peninsula Community Plan objectives regarding water quality due to potential impacts from some of the park improvements. The MEIR analyzes impacts from eliminating active use of the ballfield and eventually revegetating the area with native plant material. This change in land use would bring the site in alignment with the goals of the Master Plan but would impact the existing use by PLNU.

Geology: Implementation of park improvements such as the trail system, observation points, and

parking could impact, or be impacted by geological resources such as sea caves, cliffs, and/or overhangs. Proposals for drainage improvements, erosion control, and beach access improvements could also result in, or be affected by, geological features.

Hydrology: The Master Plan calls for initiation of a comprehensive drainage study to determine and eliminate the long-term erosion problems in the park and to address short-term erosion control measures.

Water Quality: Parking lot and park improvements could continue to contribute to water quality impacts from construction and other runoff. Future remediation at the landfill and burn ash sites could impact water quality. Water quality would eventually be improved through reduction of significant on-going erosion.

Biology: Project implementation could result in direct loss of 2.6 acres (0.8 acres of Tier I habitat such as disturbed Southern Maritime Chaparral; 0.4 acres of Tier II habitat such as Disturbed, Restored, and/or Coastal Sage Scrub; 0.2 acres of Tier III non-native grassland; and 1.2 acres of Tier IV habitat such as ruderal and disturbed habitat). Impacts could include direct impacts within the Multi-Habitat Planning Area (MHPA), and potential direct impacts to two sensitive native plant species (neither of which are federally- or state-listed, but are rare or endangered according to the California Native Plant Society designation). Indirect impacts could occur to beach and the intertidal habitat.

Visual Quality/Landform Alteration: Construction of beach access stairs and regrading of eroded areas could impact visual quality.

Public Safety: Environmental remediation of the landfill and burn ash sites could result in public exposure to hazardous waste sites.

Paleontological Resources: Park improvements could involve excavation into the Point Loma and Bay Point geologic formations which have moderate to high potential to contain significant paleontological resources. Recontouring eroded drainage areas could also impact access to paleontological resources.

Historical Resources (Archaeology): Known archaeological sites exist within the Park and could be impacted directly and indirectly by park improvements.

Historical Resources (Architectural): The Loma Land and Ladera Street Properties have been evaluated for potential historical significance and are proposed for demolition (with the possible exception of the Theosophical Society Cabin Corbin House). With the exception of the Theosophical Society Cabin Corbin House, none of the structures appears to be historically significant as associated with the Theosophical Society Historic District. The Theosophical Society Cabin Corbin House would be subject to future review by the City's Historical Resources Board to determine eligibility.

Cumulative Impacts: Significant, but mitigated, cumulative impacts have been identified to the following resource areas: hydrology/water quality, biological, paleontological, and historical resources. Mitigation identified in the Final Master EIR would ensure that the cumulative impacts are reduced to below a level of significance.

**SIGNIFICANT UNMITIGATED IMPACTS:**

No significant unmitigated environmental impacts have been identified. All potential environmental impacts have been reduced to below a level of significance with mitigation. Some potential future cumulative impacts could be significant, but would be mitigated through future environmental review: water quality, biology, paleontology, and historical resources (archaeology).

**ALTERNATIVES:**

Alternatives that would avoid and/or reduce significant direct and cumulative impacts are evaluated in Section 8 of the MEIR.

No Project Alternative: Under this alternative, the Master Plan improvements would not be implemented. While some impacts would be avoided (such as potential impacts to historical resources and water quality), other impacts would continue or result (such as continued erosion, public safety from the hazardous waste sites, and on-going impacts to archaeological and paleontological resources from erosion).

Sunset Cliffs Natural Park Recreation Council Alternative: This alternative consists of the same project elements as the proposed project with two exceptions: (1) only beach access at Ladera Street would be maintained; and (2) no permanent showers or restrooms would be constructed or further investigated. This alternative would result in overall reduced impacts and is the identified environmentally preferable alternative.

**MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP):**

To reduce or avoid potentially significant impacts to below a level of significance, the following mitigation measures have been incorporated. Due to the broad level of analysis provided in this MEIR, additional environmental review would be conducted for subsequent projects to determine conformance with the proposed MMRP and requirements of this MEIR. Additional mitigation may be required as necessary.

Land Use: Measures required for impacts to water quality, erosion, and geology/soils would be implemented to reduce long-and short-term impacts to water quality and erosion and to bring the Master Plan into conformance with the Community Plan goals.

Geology: Measures have been identified to ensure project elements are designed to be either located outside areas of instability, or designed following recommendations of a site-specific geotechnical evaluation and erosion control plan.

Hydrology: A detailed drainage study would be conducted to evaluate and present the best options to reduce and/or eliminate the on-going erosion and minimize impacts to beach erosion.

Water Quality: Site-specific Best Management Practices and Storm Water Pollution Prevention Plan would be developed for each project-specific element of the Master Plan implementation.

Biology: A Native Plant Preservation and Revegetation program would be developed and implemented by a qualified biologist in accordance with City of San Diego Biology Guidelines. Additional surveys for sensitive vegetation would be conducted in the spring time. Suitable soil would be imported as needed to help establish native plant communities. Erosion control measures would be implemented to minimize indirect impacts to the intertidal community. Disturbance to MHPA lands would be mitigated by conforming to MSCP guidelines.

Visual Quality/Landform Alteration: Design of stairway beach access would require additional environmental review and evaluation to minimize visual impacts.

Public Safety: Future environmental remediation options would be identified and implemented with additional environmental review to ensure the design and implementation would further public safety and health goals without exposing park users to hazardous waste.

Paleontological Resources: A detailed MMRP has been developed to monitor for paleontological resources when undertaking park improvements.

Historical Resources (Archaeology): A detailed MMRP has been developed to monitor for archaeological resources when undertaking park improvements. Known archaeological sites would be further evaluated and project features such as trails or observation areas designed to avoid or minimize impacts to known archaeological sites.

Historical Resources (Architectural): The Loma Land and Ladera Street Properties have been evaluated for potential historical and architectural significance. Only one structure, the Theosophical Society Cabin (Corbin House), is potentially associated with the Theosophical Society Historic District. Further consultation with the Historic Resources Board would be conducted to determine appropriate management of this potential resource.

## USE OF FINAL MASTER EIR FOR SUBSEQUENT PROJECTS

Article 11.5 of the State CEQA Guidelines regarding use of a Master EIR shall govern future use of this document in evaluating subsequent actions under the scope of this EIR. An Initial Study shall be prepared for future discretionary actions subject to the Final Master EIR. The Initial Study shall analyze whether the subsequent project was adequately described in the EIR and whether the subsequent project may cause any additional significant effect (including cumulative effects) not previously analyzed in the Master EIR. On the basis of written findings, the Environmental Analysis Section (EAS) shall determine whether any new impacts, effects, and/or mitigation measures have been identified. Whether a subsequent project is within the scope of the Master EIR is a question of fact to be determined by EAS based upon a review of the Initial Study. Public notice shall be required pursuant to the State CEQA Guidelines at 15177 (e). Projects found not to be adequately addressed by the Master EIR will require separate environmental review pursuant to Section 15178 of the State CEQA Guidelines.

This Master EIR does not necessarily provide the complete project-level review for future discretionary actions requiring permit from the City of San Diego including but not limited to a Site Development Permit (SDP) and/or Coastal Development Permit (CDP) for actions within Sunset Cliffs Natural Park. Future projects require discretionary approval and/or review to determine compliance with the Environmentally Sensitive Lands (ESL) regulations of the Municipal Code, and to determine CEQA compliance.

## LIMITATIONS ON THE USE OF FINAL MASTER EIR

Pursuant to the State CEQA Guidelines at 15179, the certified Master EIR shall not be used for **more than five years** from the date of certification unless the EAS determines that either no substantial changes have occurred, or that there is no new available information which was not known and could not have been known at the time the Master EIR was certified; or prepares a subsequent or supplemental EIR that updates or revises the Master EIR.

**PUBLIC REVIEW:**

The following individuals, organizations, and agencies received a copy or Public Notice (\*) of the draft EIR and were invited to comment on its accuracy and sufficiency:

Federal Government

U.S. Army Corps of Engineers (26)  
U.S. Environmental Protection Agency (19)  
U.S. Fish and Wildlife Service (23)  
U.S. National Marine Fisheries Service  
U.S. Naval Facilities Engineering Command, Environmental Planning Division (12)

Native Americans

Native American Heritage Commission (222)  
Ron Christman (215)  
Louie Guassac (215A)  
Kumeyaay Cultural Repatriation Committee (225)  
Native American Distribution (225 A-R\*)

State of California

State Clearinghouse (46)  
Regional Water Quality Control Board (44)  
Resources Agency (43)  
California Department of Fish and Game (32)  
California Integrated Waste Management Board (35)  
California Department of Parks and Recreation (37)  
California Coastal Commission (47)  
California Department of Boating and Waterways  
California Department of Parks and Recreation (40)

County of San Diego

County Clerk  
Department of Environmental Health (75)

City Government

City of San Diego  
Mayor Murphy

Councilmember Peters, District 1  
Councilmember Zucchet, District 2  
Councilmember Atkins, District 3  
Councilmember Lewis, District 4  
Councilmember Maienschein, District 5  
Councilmember Frye, District 6  
Councilmember Madaffer, District 7  
Councilmember Inzunza, District 8  
Development Services Department  
Environmental Services Department  
Engineering and Capital Projects (86)  
Park and Recreation Department (89)  
Planning Department (MS-5A)  
Multiple Species Conservation Program  
Historical Resources Board (MS-4A)  
Real Estate Assets Department (65)  
Peninsula Community Service Center (389)  
Library (81)  
Metropolitan Wastewater Department  
Police Department  
Water Department  
Wetlands Advisory Board (171)  
Park and Recreation Council

City of Chula Vista (94)  
City of Del Mar (96)  
City of El Cajon (97)  
City of Escondido (98)  
City of Imperial Beach (99)  
City of La Mesa (100)  
City of Lemon Grove (101)  
City of National City (102)  
City of Poway (103)  
City of Santee (104)  
City of Solana Beach (105)

Other Organizations and Interested Individuals

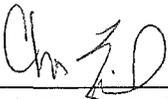
*San Diego Daily Transcript/City Bulletin*  
*The Beacon*  
*The Union-Tribune*  
Seacliff Foundation  
Point Loma Branch Library

Ocean Beach Branch Library  
Point Loma Nazarene University  
Peninsula Community Planning Board  
Peninsula Chamber of Commerce  
Ocean Beach Community Planning Board  
Ocean Beach Town Council  
Sunset Cliffs Recreation Council  
Sierra Club, San Diego Chapter  
Audubon Society  
California Native Plant Society  
Center for Biodiversity  
Citizens Coordinate for Century III  
SDSU South Coastal Information Center  
Save Our Heritage Organisation  
Surfrider Foundation  
San Diego Historical Society  
San Diego County Archaeological Society  
Endangered Habitats League  
Friends of Sunset Cliffs  
Pamela Dalton  
Barbara Keiller  
San Diego Museum of Natural History  
Ann Swanson  
Scripps Institution of Oceanography  
Dave Potter, Community Planners Committee (194)  
UCSD  
Point Loma Village Association  
League of Women Voters  
Environmental Health Coalition  
SDSU Dept of Biology  
SDSU Dept of Geological Sciences  
Dr. Schaefer  
Point Loma Village Association  
Theosophical Society

Copies of the draft MEIR, the Mitigation, Monitoring, and Reporting Program, and any technical appendices may be reviewed in the office of the Land Development Review Division, or purchased for the cost of reproduction.

**RESULTS OF PUBLIC REVIEW:**

- ( ) No comments were received during the public input period.
- ( ) Comments were received, but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the MEIR.
- (X) Comments addressing the accuracy or completeness of the MEIR were received during the public input period. The letters and responses follow.

  
\_\_\_\_\_  
Chris Zirkle ~~Cathy C. Cibit~~,  
Environmental Review Manager (Acting)  
Development Services Department

10/1/03  
Date of Draft Report

5/18/04  
Date of Final Report

12/7/04  
Date of Certification

12/7/09  
Expiration of Master EIR  
(Five years from Certification)

Analyst: WILKINSON

Appd @ Coastal Commission  
July 13, 2005