



THE CITY OF SAN DIEGO

ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

WBS No. B-23085
Addendum to EIR PTS No. 499621
SCH No. 2016081016

SUBJECT: North City Water Reclamation Plant Pure Water Facility Warehouse: The project proposes the contract for the design and construction of a warehouse that would serve as material storage for the North City Water Reclamation Plant (NCWRP) and Pure Water Facility (PWF). The warehouse will be up to 10,000 square feet (SF) and approximately 28 feet tall. The warehouse will include facilities such as office space, heating/cooling, accessibility, a restroom, a receiving area, strong shelving, roll-up doors, a cage, a front counter, chemical storage, humidity control, cameras, access control, and IT (data/phones). The warehouse will be a LEED silver certificate building. The project site would be on currently graded land within the developed footprint of the NCWRP. (LEGAL DESCRIPTION: LOT 1319*14.60 AC M/L IN\.) Applicant/Sponsor: Engineering and Capital Projects

I. SUMMARY OF PROPOSED PROJECT

The proposed project consists of the construction of a North City Water Reclamation Plant Pure Water Facility Warehouse (project). The warehouse would serve as material storage for the North City Water Reclamation Plant (NCWRP) and North County Pure Water Facility (NCPWF). The project is anticipated to result in an increase of up to two (2) employees that would work in the warehouse. The project does not propose any offsite improvements that were not initially analyzed as part of the Phase 1 Pure Water Project. The warehouse will be up to 10,000 square feet (SF) and approximately 28 feet tall. The warehouse will include facilities such as office space, heating/cooling, accessibility, a restroom, a receiving area, strong shelving, roll-up doors, a cage, a front counter, chemical storage, humidity control, cameras, access control, and IT (data/phones). The warehouse will be a LEED silver certificate building, will possibly include a battery back-up system or generator, and a PV system (and to be determined, if a separate electrical meter is warranted or tie into existing site electrical). The project will necessitate the grading of approximately 2,400 cubic yards of fill.

As described above, the project would utilize the warehouse for storage of hazardous waste materials and quantities. The warehouse is anticipated to include storage for new oil, waste oil, and flammable materials. Flammable materials would include spray paint, oil-based paint, lacquer thinner, paint thinner, hydrochloric acid, fiberglass resin, Prothane resin, gasoline, diesel and Acetone. Flammable material storage that is currently onsite would be replaced by the storage in the Project warehouse. Additionally, the project would include landscaping in accordance with the City of San Diego Municipal Code (SDMC) Land Development Code (LDC) and Land Development Manual.

Project construction would be subject to the City of San Diego Standard Specifications for Public Works Construction 2021 Edition (the "Whitebook"). With respect to storm water, all projects would be reviewed for compliance with the most recent version of the City's Storm Water Standards Manual and Municipal Separate Storm Sewer System (MS4) Permit. Prior to construction, a building permit would be issued by the City Development Services Department. Non-residential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas is subject to the City's Climate Action Plan Consistency Regulations (SDMC §143.1403).

II. ENVIRONMENTAL SETTING

The project is located within the NCWRP at 4949 Eastgate Mall, San Diego, Ca 9212. The project site is located south of Eastgate Mall and near I-805. I-805 borders the western edge of both the proposed project site and is a major north-south transportation corridor in the San Diego region. There are two potential locations for the warehouse within the NCWRP. Location A would be located between Eastgate Mall and Road A, east of Mega Trench. Location A would have a smaller footprint. Location B will be located south of Location A, on the other side of Road A (Figure 3). The City is still evaluating the section of one of the sites, in concert with the design-build contractor. As such, this Addendum addresses both locations.

The project site is currently graded as a result of implementation of Phase 1 of the previously approved Pure Water Project. The NCWRP is located on property designated for Institutional & Public and Semi-Public Facilities use according to the City's General Plan. Additionally, the facility is situated within the industrial Miramar subarea of the University Community Plan. The NCWRP site is zoned Industrial Park (IP-1-1). The project is in the Airport Land Use Compatibility Overlay Zone for MCAS Miramar, ALUCP Airport Influence Area MCAS Miramar - Review Area 1, ALUCP Noise Contour MCAS Miramar 60 - 65 CNEL, MCAS Miramar-Accident Potential Zone 2, FAA Part 77 Noticing Area MCAS Miramar//540 to 545 feet elevation above sea level, Community Plan Implementation Overlay Zone, Parking Standards Transit Priority Area, Transit Priority Area, and Very High Fire Hazard Severity Zone. Elevation varies from 315 to 380 feet throughout the site. The project site is surrounded by structures and is an active developed construction zone currently occupied by trailers.

The surrounding project area is primarily developed with suburban uses including residential, commercial, industrial, and transportation uses. Surrounding land uses include Commercial, and Industrial uses. While Portions of the North City Project area fall within the City's Multiple Species Conservation Program and Multi-Habitat Planning Area, the proposed project is not located in or adjacent to the MHPA (approximately 500 ft away or greater from the proposed construction site).

See also the EIR/EIS for the Pure Water San Diego Program, North City Project for additional detail about the Environmental Setting of the Original Project.

III. SUMMARY OF ORIGINAL PROJECT

A Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) PTS No. 499621/SCH No. 2016081016 was prepared by the City of San Diego's Development Services Department (DSD) and was certified by the City Council on August 10, 2018 (Resolution No. 311671) for the development of the North City Project Pure Water San Diego Program (North City Project EIR/EIS).

The North City Project would create up to 30 MGD of locally controlled water and reduce flows to the Point Loma Wastewater Treatment Plant, which in turn would reduce total suspended solids discharged to the ocean. The North City Project would construct facilities that have the ability to produce an annual average daily flow of 30 MGD in 2021. The North City Project would expand the existing North City Water Reclamation Plant (NCWRP) and construct an adjacent North City Pure Water Facility. Two alternative purified water pipelines are considered: one to Miramar Reservoir and one to San Vicente Reservoir. Other project components include a new pump station and forcemain to deliver additional wastewater to the NCWRP; a brine/centrate discharge pipeline; upgrades to the existing Metro Biosolids Center; and a new North City Renewable Energy Facility at the NCWRP.

The North City Project includes a variety of facilities located throughout the central coastal areas of San Diego County in the North City geographic area. A new pure water facility and three pump stations would be located within the corporate boundaries of the City of San Diego (City). Proposed alternative pipelines would traverse a number of local jurisdictions, including the cities of San Diego and Santee, and the community of Lakeside and other areas in unincorporated San Diego County. The proposed LFG Pipeline would traverse federal lands within Marine Corps Air Station (MCAS) Miramar.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the North City Project Pure Water San Diego Program Environmental Impact Report (EIR) PTS No. 499621/SCH No. 2016081016. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous environmental document;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Pursuant to the City of San Diego Municipal Code Section 128.0306 and Section 15164(c) of State CEQA Guidelines, addenda to environmental documents are not required to be circulated for public review.

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the EIR relative to the project.

**Table 1: Impact and Mitigation Summary
North City Project and Proposed SCWRP Warehouse**

Environmental Issues	North City Project¹ EIR/EIS Significance²	Proposed Project Significance	Proposed Project Mitigation Measures
General Mitigation	N/A	N/A	General MM 1-4
Land Use	LTS	LTS	-
Aesthetics	SU	LTS	-
Air Quality and Odor	LTSM	LTSM	MM-AQ-1, MM-AQ-2
Biological Resources	LTSM	LTSM	MM-BIO-9
Environmental Justice ³	NI	NI	-
Energy	LTS	LTS	-
Geology and Soils	LTS	LTS	-
Greenhouse Gas Emissions	LTS	LTS	-
Health and Safety / Hazards	LTSM	LTSM	MM-HAZ-1, MM-HAZ-2, MM-HAZ-3
Historical Resources	LTSM	LTSM	MM-HIS-3
Hydrology and Water Quality	LTS	LTS	-
Noise	SU	LTS	-

Paleontological Resources	LTSM	LTS	-
Public Services	LTS	LTS	-
Public Utilities	LTS	LTS	-
Transportation, Circulation, and Parking	SU	LTS	-
Water Supply	NI	LTS	-
Recreation	LTS	LTS	-

¹ Significance determination as applicable to the North City Water Reclamation Plan Expansion of the project. Significance of other components of the Original Project can be viewed in the North City Project EIR/EIS.

²NI = No Impact; LTS = Less Than Significant; LTSM = Less Than Significant with Mitigation Incorporated; SU = Significant and Unavoidable

³NEPA Issue area only

The North City Project includes two project alternatives and a series of project components common to both alternatives. The North City Water Reclamation Plant (NCWRP) Expansion is common to both alternatives, and this addendum focuses on the impacts and mitigation from the NCWRP Expansion component of the North City Project as compared to the proposed warehouse project.

Since certification of the North City Project EIR/EIS, the CEQA Guidelines were amended to clarify the approach for analyzing or addressing in a separate section the CEQA topic areas of energy and wildfire impacts. In addition, the metric used to evaluate transportation impacts changed from level of service (LOS) to vehicle miles traveled (VMT). As the following demonstrates, these changes to the CEQA guidelines do not represent effects that were not examined in the PEIR nor changes to the project or new information that could result in new impacts that were not previously evaluated in the PEIR. The issue of VMT is addressed in the Transportation, Circulation, and Parking section, while impacts related to wildfire are adequately addressed in the context of wild land fire risk, under the Health and Safety section.

Land Use

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS both the Miramar Reservoir and San Vicente Reservoir alternatives would result in less-than-significant impacts related to conflicts with local land use plans. The Miramar Reservoir Alternative would result in less-than-significant impacts related to conflicts with adopted local habitat conservation plans or policies protecting biological resources; no mitigation is required. The San Vicente Reservoir Alternative would result in less-than-significant impacts related to conflicts with adopted local habitat conservation plans or policies protecting biological resources with incorporation of mitigation measures MM-BIO- 1a and MM-BIO-1c.

Project

The project includes development of a previously disturbed site within the same disturbance footprint as the NCWRP. The proposed modifications would result in the construction of a warehouse as part of Phase 1 of the North City Project. The project would be located on a site that has been previously disturbed and designated for Institutional & Public and Semi-Public Facilities use by the City's General

Plan, and for Public Facilities/Institutional use by the University Community Plan. Therefore, there would be no changes to the existing land use. The proposed warehouse would not affect the anticipated construction or operational characteristics of the remaining components of the North City Project beyond what was analyzed in the North City Project EIR/EIS. The construction of the proposed warehouse would not cause the project to result in new conflicts with the City's General Plan, Municipal Code, Community Plan, local habitat conservation plan, or other applicable plan. As such, the project would not conflict with the environmental goals, objectives, and recommendations of the City of San Diego General Plan, the City of San Diego Municipal Code, or the University Community Plan where the project would be located within the MCAS Miramar Integrated Natural Resources Management Plan. Impacts would remain less than significant with incorporation of mitigation measures MM-BIO- 1a and MM-BIO-1c, which were already implemented.

The proposed project would not have significant land use impacts, and no mitigation is required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in a new significant impact or the substantial increase in the severity of impacts from that described in the EIR result.

Aesthetics

North City Project EIR/EIS

With the exception of construction activities associated with the MTBS phase of the San Vicente Reservoir Alternative, impacts to visual resources from implementation of the North City Project Alternatives would be **less than significant**.

Construction activities associated with the San Vicente Reservoir Alternative and more specifically, the MTBS, would result in a substantial change to the natural topography of the proposed site. No mitigation has been identified that would substantially reduce the anticipated impact to landform alteration from the MTBS and therefore this impact would be **significant and unavoidable**.

Project

The project includes the construction of a warehouse facility. The proposed warehouse would have a similar bulk, scale, materials, and style to the elements proposed as part of the NCWRP. The visual appearance of the expanded NCWRP would remain consistent with the existing facility and would be compatible with the surrounding development. The warehouse would not exceed the North City Project's height.

Consequently, the project would not result in significant changes to the natural topography, obstruct public views, or substantially alter the area's existing character. Additionally, the proposed warehouse would not affect the compatibility of the North City Project with surrounding development in terms of bulk, scale, materials, or style. The project has two potential locations as shown in Figure 3. Construction of the proposed warehouse at either location would result in similar aesthetic impacts.

There are no significant effects on aesthetics/visual effects or neighborhood character, and therefore no mitigation measures are required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Air Quality and Odor

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to result in less than significant impacts with the implementation of mitigation measures. Per Table 6.3-18, Applicability of Air Quality Mitigation Measures to Project Components, the NCWRP Expansion was to implement MM-AQ-1, MM-AQ-2, and MM-AQ-3. The North City Project would result in impacts associated with daily construction emissions and odor impacts from the reclamation facility and pump station; however, with incorporation of mitigation measures MM-AQ-1 (Best management practices), MM-AQ-2, (nitrous oxides) and MM-AQ-3 (odor) impacts were determined to be less than significant.

Project

The project would involve the construction of a warehouse facility on a site that has been previously graded and disturbed as part of implementation of the North City Project. The proposed warehouse would not generate a significant increase in construction activities or emissions compared to what was previously analyzed in the North City Project EIR/EIS. The proposed warehouse, which would be used for a storage and distribution facility, would not result in a substantial increase in the construction and operational emissions for the overall project. Given that the project site has been previously graded, construction emissions associated with grading activities are already included in the North City Project EIR/EIS analysis. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar air quality impacts. Mitigation measures MM-AQ-1 and MM-AQ-2 would continue to apply during construction. MM-AQ-3 states the City shall implement odor control systems at the NCWRP Expansion and other components specifically designed to abate the potential odors of the facility. Specifically at the North City Water Reclamation Plant Expansion and the Morena Pump Station: NaOCl/NaOH Wet Scrubber plus carbon or Biofilter plus carbon. Alternatively, odors could be abated through the addition of chemicals to reduce the liquid phase concentration and thus, reduce the amount volatilized into the gas phase. MM-AQ-3 would not apply to the project as the project is limited to warehouse construction.

The project would implement mitigation measures MM-AQ-1 and MM-AQ-2 and impacts to air quality and odor would remain less-than-significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Biological Resources

North City Project EIR/EIS

As outlined in the Final North City Project EIR/EIS, the NCWRP expansion was located entirely within the existing facility's footprint. Per Table 6.4-18 of the North City Project EIR/EIS, Mitigation Measures Applicable to North City Project Components, the NCWRP Expansion (includes NCPWF Influent Pump Station and North City Renewable Energy Facility) was determined to result in potentially significant direct and indirect impacts to vegetation, sensitive plants, sensitive wildlife, and jurisdictional resources. Mitigation measures 3, 4a, 4b, 9a-g, 9j, and 9k apply to the NCWRP expansion. Additionally, MM-BIO- 1a through MM-BIO-1c apply to the whole of the North City Project, as indicated in the Land Use section of the EIR/EIS.

Project

The project proposes the construction of a warehouse facility at one of two potential locations, both of which have been previously graded and disturbed. The project would maintain compliance with the City's Multiple Species Conservation Program (MSCP) Subarea Plan, as the impacts would remain within the scope of what was previously evaluated in the North City Project EIR/EIS. Additionally, the proposed warehouse would not involve activities that would generate significant noise, vibration, or light pollution, all of which can have adverse effects on biological resources. Because the two potential locations of the warehouse have already been altered by prior development activities, the construction of the proposed warehouse would not introduce new biological impacts beyond those already analyzed for the North City Project.

Habitat-based mitigation has been provided with initial project impacts, thus the project is not subject to MM-BIO-1a through MM-BIO-1c. The project would be subject to the City of San Diego Whitebook requirements for a pre-con nesting survey by a qualified biologist, thus no significant impacts would occur to special status nesting species, and impacts would be less than significant; MM-BIO 3 would not apply. MM-BIO-4a does not apply because the project is approximately 500 ft or greater from the MHPA, and MM-BIO-4b does not apply because the project is not on MCAS Miramar. MM-BIO-9 would reduce the potential for short-term and long-term indirect impacts to sensitive vegetation communities and would continue to apply. A biological monitor would be present during construction within or adjacent to sensitive resources and would ensure that the Project adheres to and implements the appropriate measures to protect sensitive resources. Given that the warehouse would be constructed on previously graded and disturbed land, and that mitigation measures remain applicable, no additional mitigation is necessary.

Impacts to biological resources would remain less-than-significant with the implementation of mitigation measures MM-BIO-9a-g, 9j, and 9k. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Environmental Justice

North City Project EIR/EIS

As discussed in the Final North City Project EIR/EIS and consistent with the requirements set forth in CEQA Guidelines Sections 15064 and 15131, environmental justice effects are not treated as significant impacts on the environment, and no CEQA significance thresholds or conclusions are presented for such effects. Executive Order 12898 requires federal actions to address disproportionately high adverse effects on minority and low-income populations. More specifically, an environmental justice effect would occur from the North City Project if:

- More groups are affected of racial minority status within the Project area than in the San Diego region as a whole.
- More high-poverty/low-income minority status groups are affected within the Project area than in the San Diego region as a whole.

The EIR determined that short-term construction effects and long-term operational effects would not be borne disproportionately by a minority or low-income population, and no mitigation is required.

Project

The project area is a small portion of the original North City project footprint and is not located within an environmental justice community. No adverse effects to groups of racial minority or low income status would result of implementation of the project.

Impacts would remain less than significant and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Energy

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, although electricity, natural gas, and petroleum consumption would increase due to project implementation, both alternatives of the North City project would be required to comply with all applicable federal, state, and local regulations pertaining to energy efficiency. These provisions include the mandatory energy requirements set forth by Title 24, Part 6, of the California Code of Regulations. Additionally, the project would replace the supply and conveyance component associated with typical urban water systems. Therefore, electricity and natural gas consumption would not be considered excessive, and impacts would be less than significant under CEQA. No mitigation is required.

Project

The project would involve the construction of a warehouse facility that would accommodate up to two additional workers and would generate a minimal increase in energy demand for the NCWRP. The two proposed locations would result in similar energy impacts.

Consistent with the North City Project, any natural gas usage would be temporary and negligible. Similarly, the use of heavy-duty construction equipment and employee vehicle trips, would result in minor and temporary increases in petroleum use, which would constitute a negligible fraction of statewide consumption. The limited number of additional employees for the warehouse would generate a negligible increase in vehicle miles traveled (VMT) and associated fuel use during operations and would not result in inefficient or wasteful use of petroleum resources.

Furthermore, the warehouse facility, like the North City Project, would be subject to federal, state, and local energy efficiency regulations, including the mandatory requirements of Title 24, Part 6, of the California Code of Regulations. These regulations ensure that energy consumption remains efficient and does not result in significant impacts.

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

Geology and Soils

North City Project EIR/EIS

As outlined in the North City Project EIR/EIS, the North City Project would be subject to geologic risks. Compliance with the most recent CBC and other applicable standards regarding seismicity and site-specific geologic conditions, as well as site preparation and design recommendations of each component-specific geotechnical report (Appendices D1–D5 of the North City Project EIR/EIS) would ensure that impacts associated with geologic hazards would be less than significant.

Project

The project, which would involve the construction of a warehouse facility, would be located on a previously graded and disturbed sites result in less-than-significant impacts. Both of the potential locations for the warehouse have already undergone significant land disturbance and grading and are currently being used for storage. The structures would be required to have a building permit prior to construction, and the City of San Diego Development Services Department would be required to ensure geologic conditions are appropriate for development.

The project would be consistent with the California Building Code and safety regulations. The proposed warehouse facility would be developed within the North City Project footprint, as such, the geologic conditions would remain consistent with what was previously identified and analyzed in the North City Project EIR/EIS. The project would not result in any additional land disturbance that could introduce new geological hazards. All aspects of the proposed warehouse's construction would continue to meet the standards set forth in the original geotechnical studies and the North City Project EIR/EIS, ensuring that impacts related to geology and soils remain less than significant.

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

Greenhouse Gas Emissions

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to be consistent with the City of San Diego 2015 Climate Action Plan (CAP), and no mitigation was required. Both alternatives would be consistent with the City's CAP as shown using the CAP Consistency Checklist and through the five CAP strategies. Therefore, under CEQA, impacts would be less than significant.

Project

The increase in GHG emissions from construction and operation of the proposed warehouse compared to the North City Project would be nominal. The warehouse facility, which is intended primarily for material storage, would have limited energy requirements and would result in an increase of up to two workers on the site. As previously discussed, the North City Project's electricity consumption was deemed minimal. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar GHG impacts.

Operational emissions associated with the warehouse would be minimal due to the limited number of employees and vehicle trips (approximately two additional workers). The additional VMT and

associated fuel use would be negligible compared to statewide consumption and would not lead to inefficient or wasteful energy use, further minimizing GHG emissions during operations. The proposed project would continue to comply with federal, state, and local energy efficiency regulations, including Title 24, Part 6, of the California Code of Regulations, which further ensures that energy consumption is minimized and does not contribute to significant GHG emissions.

Therefore, the project would result in nominal increases in GHG emissions beyond those analyzed in the North City Project EIR/EIS. Additionally, the project would comply with all applicable regulations and would not conflict with the City's Climate Action Plan (CAP), as demonstrated in the CAP memo prepared for the project (City of San Diego, 2025). With the limited scale of the proposed warehouse facility, impacts related to GHG would remain less-than-significant, and no new mitigation measures would be required. The project would remain consistent with the sustainability and energy efficiency goals established for the North City Project, ensuring that it aligns with California's GHG reduction strategies and regulatory framework.

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

Health and Safety Hazards

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to result in less-than-significant impacts with the implementation of mitigation. The construction of the North City Project was determined to have potentially significant wildfire risk during construction, however with the implementation of mitigation measure MM-HAZ-1, impacts would be less than significant. Specifically, the North City Project was identified as having potentially significant impacts related to accidental spills during operation and maintenance activities which would be mitigated to less than significant levels with implementation of mitigation measures MM-HAZ-2 and MM-HAZ-3. Impacts related to the potential to encounter a hazardous materials site during pipeline construction of the San Vicente Reservoir Alternative would be potentially significant, and mitigation measures MM-HAZ-4 and MM-HAZ-5 would also be applicable to pipeline construction for the San Vicente Reservoir Alternative.

Project

The project proposes the construction of a warehouse facility that would primarily serve as a storage space for materials supporting both the NCWRP and NCPWF. Although the warehouse would store potentially hazardous materials, it would consolidate and improve the management of these materials by replacing existing on-site storage facilities with storage in a dedicated, controlled environment. The proposed warehouse's design and operational procedures would adhere to all applicable health, safety, and hazardous materials regulations, including federal, state, and local standards for hazardous materials storage and handling. This ensures that risks related to the storage and management of flammable or hazardous materials are minimized. The proposed warehouse facility would not introduce any new risks to the site. The materials to be stored in the warehouse are consistent with those already in use on the site, and the facility's improved storage conditions would enhance safety, reducing the likelihood of accidents. The project would remain subject to mitigation

measures MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3, and would be required to prepare a Construction Fire Prevention/Protection Plan, a Hazardous Materials Reporting Form in accordance with DSD IB 116, and a Spill Prevention and Emergency Response Plan, respectively.

The project would be required to implement mitigation measures MM-HAZ-1, MM-HAZ-2, and MM-HAZ-3, which would ensure potential impacts remain less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Historical Resources

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, North City Project components would potentially result in impacts to unknown archaeological resources, grave sites, and/or human remains. To mitigate these risks, the implementation of mitigation measures MM-HIS-1, MM-HIS-2, MM-HIS-3, and MM-HIS-4 would ensure impacts from the North City project would be less than significant. Specifically, the NCWRP Expansion portion of the project would implement MM-HIS-3. With the implementation of mitigation, impacts would be less than significant.

Project

The project proposes the construction of a warehouse at two potential locations. Because these locations have already undergone significant ground disturbance, the likelihood of encountering previously undiscovered archaeological or historical resources is substantially reduced.

Additionally, the project does not propose any changes to the excavation depth or scope beyond what was analyzed in the North City Project. The previously implemented mitigation measure, MM-HIS-3, would continue to apply to the project, ensuring that any unexpected discoveries of archaeological materials or human remains are handled in accordance with established protocols.

Impacts to historical resources would remain less than significant with MM-HIS-3. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Hydrology and Water Quality

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the NCWRP expansion was identified as needing permanent best management practices (BMPs). Compliance with existing laws, regulations, National Pollutant Discharge Elimination System (NPDES) / Waste Discharge Requirements (WDR) permits, and the City's Stormwater Standards Manual are sufficient to avoid or substantially reduce adverse impacts with regard to alteration to drainage patterns, the rate/volume of stormwater runoff, stormwater quality, and non-stormwater discharges to less than significant.

Project

The project would include the construction of a warehouse facility for materials storage. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar hydrology and water quality impacts. The project would comply with all applicable laws and regulations, such as the NPDES/WDR permits, and the City's Storm Water Standards Manual. These regulatory frameworks are specifically designed to prevent adverse impacts related to stormwater runoff, drainage pattern alterations, and non-stormwater discharges. Following these standards, would allow the project to ensure that water quality is protected and that any changes in stormwater quantity or quality are mitigated effectively.

Additionally, because the warehouse would be constructed on land that has already been graded and disturbed, impacts related to erosion, sedimentation, or changes in drainage patterns would be similar to those of the North City Project. Additionally, the proposed 10,000 square foot warehouse would not significantly increase impervious surfaces onsite. The warehouse facility's design and function as a materials storage area already exists onsite and does not introduce new impacts to water quality. There would be no large-scale industrial processes or significant discharges from the facility. Therefore, the project would not create new pollutant sources that could adversely affect water bodies or stormwater systems.

Impacts related to hydrology and water quality would remain less-than-significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Noise

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to have significant and unavoidable impacts to certain components of the project with mitigation measures by project component laid out in Table 6.12-7 of the EIR/EIS. Construction activities at the MTBS as well as along the Morena Pipelines and San Vicente Pipeline are anticipated to create temporary substantial noise increases and result in short-term exceedances of the City's noise standard for construction of 75 dBA Leq; therefore, construction noise impacts for the MTBS, San Vicente Pipeline and Morena Pipelines would be potentially significant and unavoidable even with implementation of mitigation measures MM-NOI-1 through MM-NOI-3. Due to impacts associated with the MTBS, construction vibration impacts would be significant and unavoidable for the San Vicente Reservoir Alternative. With implementation of mitigation measure MM-NOI-4, operational noise impacts would be less than significant under both alternatives. Mitigation measures by project component laid out in Table 6.12-7. The NCWRP Expansion portion of the project is not subject to mitigation measures.

Project

The project would involve the construction of a warehouse facility for materials storage. The construction of the warehouse would not result in any major changes to the scope, duration, or methods of construction previously analyzed for the NCWRP expansion. Additionally, the proposed sites for the warehouse sites have already been graded, reducing the construction noises associated with preliminary grading. Potentially significant noise and vibration impacts, would remain less than significant.

Operational noise from the warehouse is expected to be minimal, given its primary function as a storage facility with limited operational activities. The low number of employees (approximately two), the absence of large-scale machinery or industrial processes, and the minimal number of truck deliveries would not result in a substantial increase in vibration or operational noise compared to the North City Project. The project has two potential locations, and operation of the proposed warehouse at either location would result in similar noise impacts.

Impacts related to noise would be less-than-significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Paleontological Resources

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to have less-than-significant impacts related to paleontological resources with the implementation of mitigation measures. Specifically, the NCWRP Expansion is underlain by soils with moderate to high paleontological sensitivity, and construction activities in this area could result in potentially significant impacts to paleontological resources. However, with the incorporation of mitigation measure MM-PAL-1, these impacts would be reduced to a level below significance. Other components of the North City Project were determined not to pose a risk to paleontological resources due to the low sensitivity of the areas where they are located.

Project

The project would involve the construction of a warehouse facility that would primarily be used for materials storage. The proposed warehouse locations have been previously graded, reducing the likelihood of encountering undisturbed paleontological resources during construction. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar paleontological impacts. Because the proposed warehouse would not involve the expansion of the development footprint, it would not create additional ground disturbance beyond what was analyzed in the North City Project EIR/EIS.

The project is required to comply with the City of San Diego Municipal Code (SDMC) Section 142.0151. Should grading quantities exceed the quantities identified in the SDMC (greater than 10 ft in depth, and greater than 1,000 CY in a high sensitivity unit/2,000 CY in a moderate sensitivity unit), a paleontological monitor would be required in compliance with the Land Development Manual Appendix P, General Grading Guidelines for Paleontological Resources. As such, impacts would be less than significant and the previously identified mitigation measure MM-PAL-1, would not apply to the project.

Compliance with SDMC Section 142.0151 and the City's General Grading Guidelines for Paleontological Resources would ensure project impacts would be less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Public Services

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project would have less-than-significant impacts related to public services. All construction of facilities and pump stations would be located within facility footprints and would not affect police or fire response. The NCPWF and NCWRP are located within established areas currently served by SDPD, and the nearest station is located approximately 1 mile away. Therefore, with the combination of staffing, 24-hour monitoring, and implementation of security measures, the treatment facilities would not result in a substantial increase in demand for police or fire protection services. Additionally, the North City Project would not result in a substantial population increase. No new or altered police, fire, school, park, or library facilities would be required. Impacts were determined to be less than significant, and no mitigation was required.

Project

The project proposes the construction of a warehouse facility at one of two potential locations, both of which have been previously graded and disturbed. .

The proposed warehouse facility would serve as a support structure for materials storage related to the NCWRP and NCPWF, and would include up to two employees, which would not substantially increase demand for public services. Given that the warehouse would be supporting the facilities of the North City Project, the proposed warehouse would not create the need for new or physically altered government facilities, the construction of which could cause environmental impacts. Additionally, because the proposed warehouse would not introduce new residential or significant commercial development, it would not increase population or place additional strain on public infrastructure. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar impacts to public services. Finally, because the project would not expand the development footprint or alter the scope of the North City Project, it would not generate a need for additional public services.

Impacts to public services would remain less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR.

Public Utilities

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, pipelines would be constructed primarily in roadway rights-of-way in areas of highly congested utilities. In some cases, design standards requiring minimum separation of utilities may not be able to be met. Impacts related to conflicts with existing utilities may be potentially significant under CEQA. To reduce potential impacts, mitigation measure MM-PU-1 would be required for Morena Pipelines and the North City and San Vicente Pipeline Alternatives, but would not be required for the NCWRP Expansion component of the North City Project. City of San Diego Public Utilities Department shall consult with other City departments and other utility service providers to avoid interference with facilities. The North City Project would also adhere to the requirements of Section 702 of the City's Whitebook during construction with regard to

the reduction of construction and demolition waste, including meeting the 75% waste diversion target, and no adverse impacts related to solid waste disposal would occur.

Project

The project proposes the construction of a warehouse facility primarily used for materials storage and would not result in a significant increase for utility demands or significant changes to utility infrastructure. The facility's utility needs, such as electricity, water, and communications systems, would be minimal and would connect to the existing utility infrastructure on the project site, avoiding the need for new utility lines or major infrastructure upgrades. Since no major pipelines are being constructed in this portion of the project, mitigation measure MM-PU-1 would not apply. The project would likewise be subject to Section 702 of the City's Whitebook and waste diversion requirements.

Impacts to public utilities would remain less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Transportation, Circulation, and Parking

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project would result in significant and unavoidable impacts related to project-related construction traffic, even with the implementation of mitigation measure MM-TRAF-1. Per Table 6.16-17 of the EIR/EIS, MM-TRAF-1 would apply to the Morena Pipelines component and either the North City Pipeline or San Vicente Pipeline component, to require construction worker Transportation Demand Management (TDM), but TDM would not be required for the NCWRP Expansion component. Impacts to traffic patterns, transportation facilities, and parking were determined to be less than significant, and no mitigation would be required.

Project

The project would involve the construction of a warehouse facility primarily used for materials storage. This facility would introduce approximately two additional employees, a minimal increase that would not substantially affect traffic volumes, circulation patterns, or parking demand. The project has two potential locations, and construction of the proposed warehouse at either location would result in similar transportation impacts. Per the City of San Diego Transportation Study Manual Appendix A, the project would have a less than significant impact on VMT, and no Local Mobility Analysis (i.e., Level of Service analysis) or VMT analysis is required. The project would be subject to Whitebook Section 600 - Access, Section 601 - Temporary Traffic Control For Construction And Maintenance Work Zones; as well as Section 5-10.2 "Community Outreach Services" which requires notifying property owners and tenants prior to street closure/detour. Temporary traffic control (TTC) for construction and Work zones shall conform to Part 6 of the California MUTCD, the specifications, and the Traffic Control Plan (TCP), if required.

Given the scale of the proposed warehouse and the previously analyzed transportation infrastructure, the project would not generate a substantial increase in traffic compared to what was analyzed in the North City Project EIR/EIS, nor would it introduce new operational characteristics that would affect traffic circulation including effects on existing public access points. Construction traffic impacts would be less than significant, and MM-TRAF-1 does not apply.

Impacts associated with transportation would be less than significant and no mitigation measures would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Water Supply

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to have a beneficial effect on water supply. The North City Project in both alternatives would increase the availability and reliability of local water supplies. The City's continued capacity to provide non-potable recycled water to existing customers would not be affected and therefore no impacts under CEQA would occur on the non-potable recycled water supply.

Project

The project, which proposes the construction of a warehouse facility for materials storage, would not alter the construction or operational characteristics of the North City Project in a way that would affect water supply.

The warehouse facility, serving a limited function, would have minimal water demands, consistent with what was anticipated and analyzed in the North City Project. The provision of a reliable water supply remains a key element of the North City Project, which would continue to be unaffected by the introduction of the warehouse. The project does not involve any changes that would increase water consumption or require modifications to existing water infrastructure beyond what was already accounted for in the North City Project EIR/EIS.

Project effects on water supply would continue to be beneficial and less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Recreation

North City Project EIR/EIS

As discussed in the North City Project EIR/EIS, the North City Project was determined to have less-than-significant impacts on recreational resources, and no mitigation would be required.

Project

The project would involve the construction of a warehouse facility for materials storage, would not alter the construction or operational characteristics of the components of the the North City Project in a manner that would impact recreation. The proposed warehouse facility is not designed to increase the use of existing parks or recreational facilities, nor does it include any new or expanded recreational amenities. Impacts would remain less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The

project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

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

GENERAL

1. Prior to issuance of a Notice to Proceed (NTP) or any construction permits, including but not limited to, the first Demolition Plans/Permits, and Building Plans/Permits, the Assistant Deputy Director (ADD) Environmental Designee of the Land Development Review Division shall verify that all mitigation measures listed in this EIR/EIS have been included in entirety on the submitted construction documents and contract specifications, and included under the heading, "Environmental Mitigation Requirements." In addition, the requirements for a Preconstruction Meeting shall be noted on all construction documents.
2. Prior to the commencement of work, a Preconstruction Meeting (Pre-con) shall be conducted and include the City of San Diego's Mitigation Monitoring Coordination (MMC) Section, Construction Manager (CM), Resident Engineer, Building Inspector, Project Consultant, Applicant and other parties of interest.
3. Evidence of compliance with other permitting authorities is required, if applicable. Evidence shall include either copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee.
4. Pursuant to Section 1600 et seq. of the State of California Fish & Game Code, evidence of compliance with Section 1602 is required, if applicable. Evidence shall include either copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee.

AIR QUALITY

MM-AQ-1 The following best management practices shall be implemented during construction to comply with applicable San Diego Air Pollution Control District (SDAPCD) rules and regulations and to further reduce daily construction emissions:

- Best management practices that could be implemented during construction to reduce particulate emissions and reduce soil erosion and trackout include the following:
- Cover or water, as needed, any on-site stockpiles of debris, dirt, or other dusty material.
- Use adequate water and/or other dust palliatives on all disturbed areas in order to avoid particle blow-off. Due to current drought conditions, the contractor shall consider use of
- a SDAPCD-approved dust suppressant where feasible to reduce the amount of water to be used for dust control. Use of recycled water in place of potable water shall also be considered provided that the use is approved by the City of San Diego and other applicable regulatory

agencies prior to initiation of construction activity.¹ Use of recycled water shall be in compliance with all applicable City of San Diego Rules and Regulation for Recycled Water (City of San Diego 2016a), particularly for the protection of public health per the California Code of Regulations, Title 22, Division 4.

- Wash down or sweep paved streets as necessary to control trackout or fugitive dust.
- Cover or tarp all vehicles hauling dirt or spoils on public roads if sufficient freeboard is not available to prevent material blow-off during transport.
- Use gravel bags and catch basins during ground disturbing operations.
- Maintain appropriate soil moisture, apply soil binders, and plant stabilizing vegetation.

MM-AQ-2 The following measures shall be adhered to during construction activities associated with the North City Project to reduce oxides of nitrogen (NOx):

- a. All diesel-fueled construction equipment shall be equipped with Tier 3 or better (i.e., Tier 4 Interim or Tier 4 Final) diesel engines.
- b. The engine size of construction equipment shall be the minimum size suitable for the required job.
- c. Construction equipment shall be maintained in accordance with the manufacturer's specifications.

BIOLOGY

MM-BIO-9 The following measures will be included in the design and construction documents for each Project component to reduce potential impacts to sensitive resources:

- a. **Qualified Biologist.** 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 Municipal Code, Land Development Code— Biology Guidelines (City of San Diego 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

¹ The use of recycled water for construction purposes requires approval of the City and other regulatory agencies on a case-by-case basis. The permit shall be obtained prior to beginning construction. Recycled water used for construction purposes may only be used for soil compaction during grading operations, dust control, and consolidation and compaction of backfill in trenches for non-potable water, sanitary sewer, storm drain, gas and electric pipelines. Equipment operators shall be instructed about the requirements contained herein and the potential health hazards involved with the use of recycled water. Water trucks, hoses, drop tanks, etc. shall be identified as containing non-potable water and not suitable for drinking.

Determinations as to specific uses to be allowed shall be in accordance with the standards set forth in Title 22, Division 4 of the California Code of Regulations and with the intent of this ordinance to preserve the public health. The City may, at its discretion, set forth specific requirements as conditions to providing such services and/or require specific approval from the appropriate regulatory agencies (City of San Diego 2016a).

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

- c. **Documentation.** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance, project permit conditions; California Environmental Quality Act (CEQA); National Environmental Policy Act (NEPA); endangered species acts (federal Endangered Species Act and California Endangered Species Act); and/or other local, state or federal requirements.
- d. **Biological Construction Mitigation/Monitoring Exhibit.** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents above. In addition, the BCME would include restoration/revegetation plans, plant salvage/relocation requirements (e.g., burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife (USFWS) protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, written and graphic depiction of the Project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- e. **Construction Fencing.** 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 delineating buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- f. **On-site 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).
- g. **Biological Monitoring.** During construction, a Qualified Biologist would be present to assist in the avoidance of impacts to native vegetation, jurisdictional aquatic resources, sensitive plants and wildlife, and nesting birds. Specific biological monitoring and or mitigation measures for sensitive wildlife, sensitive vegetation communities, and jurisdictional aquatic resources are described further in the mitigation measures.
- h. **Cover Trenches.** General biological monitoring shall include verifying that the contractor has covered all steep-walled trenches or excavations over night or after shift. If trenches or excavations cannot be covered, the monitor would verify that the contractor has installed exclusionary fencing (e.g., silt fence) around the trenches or excavation areas or installed ramps to prevent entrapment of wildlife (e.g., reptiles and mammals). If animals are encountered within any trenches or excavated areas, they would be removed by the biological monitor, if possible, or provided with a means of escape (e.g., a ramp or sloped surface) and allowed to disperse. In addition, the biological monitor would provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and

equipment and to use best judgment to avoid killing or injuring wildlife. The biological monitor would be available to assist with moving wildlife, if necessary.

- j. **Best Management Practices/Erosion/Runoff.** The City will incorporate methods to control runoff, including a Stormwater Pollution Prevention Plan (SWPPP) to meet National Pollutant Discharge Elimination System (NPDES) regulations or batch discharge permit from the City. Implementation of stormwater regulations are expected to substantially control adverse edge effects (e.g., erosion, sedimentation, habitat conversion) during and following construction both adjacent and downstream from the study area. Typical construction Best Management Practices (BMPs) specifically related to reducing impacts from dust, erosion, and runoff generated by construction activities would be implemented. During construction, material stockpiles shall be placed such that they cause minimal interference with on-site drainage patterns. This will protect sensitive vegetation from being inundated with sediment-laden runoff. Dewatering shall be conducted in accordance with standard regulations of the Regional Water Quality Control Board (RWQCB). An NPDES permit, issued by RWQCB to discharge water from dewatering activities, shall be required prior to start of dewatering. This will minimize erosion, siltation, and pollution within sensitive communities. Design of drainage facilities shall incorporate long term control of pollutants and stormwater flow to minimize pollution and hydrologic changes.
- k. **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 impactful 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 CDs 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."

HEALTH AND SAFETY HAZARDS

MM-HAZ-1 A Construction Fire Prevention/Protection Plan shall be prepared by the City of San Diego or its contractors prior to construction of the North City Project, as determined necessary by the City of San Diego. Construction within or immediately adjacent to areas of dense foliage during periods of low humidity and/or high winds (Red Flag Warning periods) shall be prohibited. During all other non-Red Flag Warning periods, necessary brush fire prevention and management practices shall be incorporated and shall address common construction-related ignition prevention and hot-works (any spark-, heat-, or flame-producing activity) policies, as well as necessary fire prevention equipment to be on site during all construction activities. Details of the Construction Fire Prevention/Protection Plan shall be determined as site plans for each component are finalized to the satisfaction of the City of San Diego Fire Marshal. Plans shall also contain fire safety information to be disseminated to construction crews during regular safety meetings. Fire prevention techniques shall be applied during construction as deemed necessary by the City of San Diego Fire Marshal based on the vegetation (fuels) within the site and surrounding areas.

MM-HAZ-2 A Hazardous Materials Reporting Form shall be prepared, as determined necessary by the City of San Diego, and a Hazardous Materials Review conducted by the Development Services Department for each North City Project component in compliance with the City of San Diego's Information Bulletin 116.

MM-HAZ-3 A Spill Prevention and Emergency Response Plan shall be completed, as determined necessary by the City of San Diego, for each North City Project component which includes on-site storage of hazardous materials (i.e., Morena Pump Station, NCWRP Expansion, North City Renewable Energy Facility, NCPWF, and Dechlorination Facility) prior to the commencement of operation. Other safety programs, including a worker safety program, fire response program, a plant safety program, and the facility's standard operating procedures, shall be developed addressing hazardous materials storage locations, emergency response procedures, employee training requirements, hazard recognition, fire safety, first aid/emergency medical procedures, hazard communication training, and release reporting requirements.

HISTORICAL RESOURCES

MM-HIS-3 To reduce potential impacts to unknown archaeological resources and/or grave sites during construction of all Project components (i.e., Components Common to the Project Alternatives, Miramar Reservoir Alternative, and San Vicente Reservoir Alternative) the following measures shall be implemented:

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

1. Prior to permit issuance or bid opening/bid award, whichever is applicable, the 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 Environmental Designee

1. Prior to bid award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordinator (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 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 City Historical Resources Guidelines.
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 (0.25-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 0.25-mile radius.
- B. PI Shall Attend Preconstruction Meetings
1. Prior to beginning any work that requires monitoring, the applicant shall arrange a Preconstruction Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM), Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified archaeologist and Native American monitor shall attend any grading/excavation related Preconstruction Meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the Preconstruction Meeting, the applicant shall schedule a focused Preconstruction Meeting with MMC, the PI, RE, CM, if appropriate, prior to the start of any work that requires monitoring.
 - b. Acknowledgment of Responsibility for Curation (Capital Improvement Program or Other Public Projects)
 2. The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
 3. 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 11×17) 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 the age of existing pipelines, laterals and associated appurtenances, and/or any known soil conditions (native or formation).
 - c. MMC shall notify the PI that the AME has been approved.
 4. 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 age of existing pipe to be replaced, depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
 5. Approval of AME and Construction Schedule

After approval of the AME by MMC, the PI shall submit to MMC written authorization of the AME and Construction Schedule from the CM.

III. During Construction

- A. Monitor 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 that could result in impacts to archaeological

resources as identified on the AME. **The CM 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 Occupational Safety and Health Administration 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-III.C and IV.A-IV.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 Records. The Consultant Site Visit Records shall be emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities, including but not limited to digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or CM, as appropriate.
2. The Archaeological 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 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) and obtain written approval of the program from MMC, CM, and RE. The ADRP and any mitigation must be approved by MMC, RE, and/or CM 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 Guidelines Section 15064.5, 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.

(1) Note: For pipeline trenching and other linear projects in the public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."

- 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.

(1) Note: For pipeline trenching and other linear projects in the public right-of-way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resource; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.

(2) Note: For pipeline trenching and other linear projects in the public right-of-way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as potentially significant.

- D. Discovery Process for Significant Resources – Pipeline Trenching and Other Linear Projects in the Public Right-of-Way

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the public right of-way, including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:

- 1. Procedures for documentation, curation, and reporting
 - a. One hundred percent (100%) of the artifacts within the trench alignment and width shall be documented in situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.
 - b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.
 - c. The PI shall be responsible for recording (on the appropriate State of California Department of Parks and Recreation forms DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's HRG. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or SDI Number and included in the Final Monitoring Report.
 - d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

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 Guidelines Section 15064.5(e), the California Public Resources Code Section 5097.98, and the California Health and Safety Code Section 7050.5, shall be undertaken:

- A. Notification
 - 1. Archaeological Monitor shall notify the RE or CM as appropriate, MMC, and the PI, if the monitor is not qualified as a PI. MMC will notify the appropriate Environmental Designee 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 provenience of the remains.
 - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
 - 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 Descendant (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Guidelines Section 15064.5(e) and the California Public Resources and Health and 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 California Public Resources Code Section 5097.94(k), by the NAHC fails to provide measures acceptable to the landowner, THEN
 - c. To protect these sites, the landowner shall do one or more of the following:
 - i. Record the site with the NAHC,
 - ii. Record an open space or conservation easement, or
 - iii. 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 items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c.
- C. 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 (California Public Resources Code, Section 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, Environmental Designee, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

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

VI. Post Construction

- A. 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 HRG (Appendix C/D) that describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC via the RE 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 time frame as a result of 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 ADRP or Pipeline Trenching Discovery Process 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 Parks 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 HRG, 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 via the RE for revision or for preparation of the Final Report.
 3. The PI shall submit revised Draft Monitoring Report to MMC via the RE for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or CM, 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.
- 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. 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 C.
 3. The PI shall submit the Accession Agreement and catalogue record(s) to the RE or CM, as appropriate for donor signature with a copy submitted to MMC.
 4. The RE or CM, as appropriate shall obtain signature on the Accession Agreement and shall return to PI with copy submitted to MMC.
 5. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or CM and MMC.
- D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or CM as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC of the approved report.
 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 North City Project Pure Water San Diego Program Environmental Impact Report (EIR) PTS No. 499621/SCH No. 2016081016 indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: **land use, aesthetics, air quality, biological resources, health and safety/hazards, historical resources, noise, paleontological resources, public utilities and transportation, circulation, and parking.** The EIR concluded that significant impacts related to

aesthetics, noise, and transportation, circulation, and parking would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the EIR would result in significant **transportation, circulation, and parking** impacts, which would remain significant and unmitigated.

Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

VIII. CERTIFICATION

Copies of the addendum, the certified EIR/EIS, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at:

<https://www.sandiego.gov/ceqa/final>.



Jamie Kennedy
Senior Planner
Engineering and Capital Projects Department

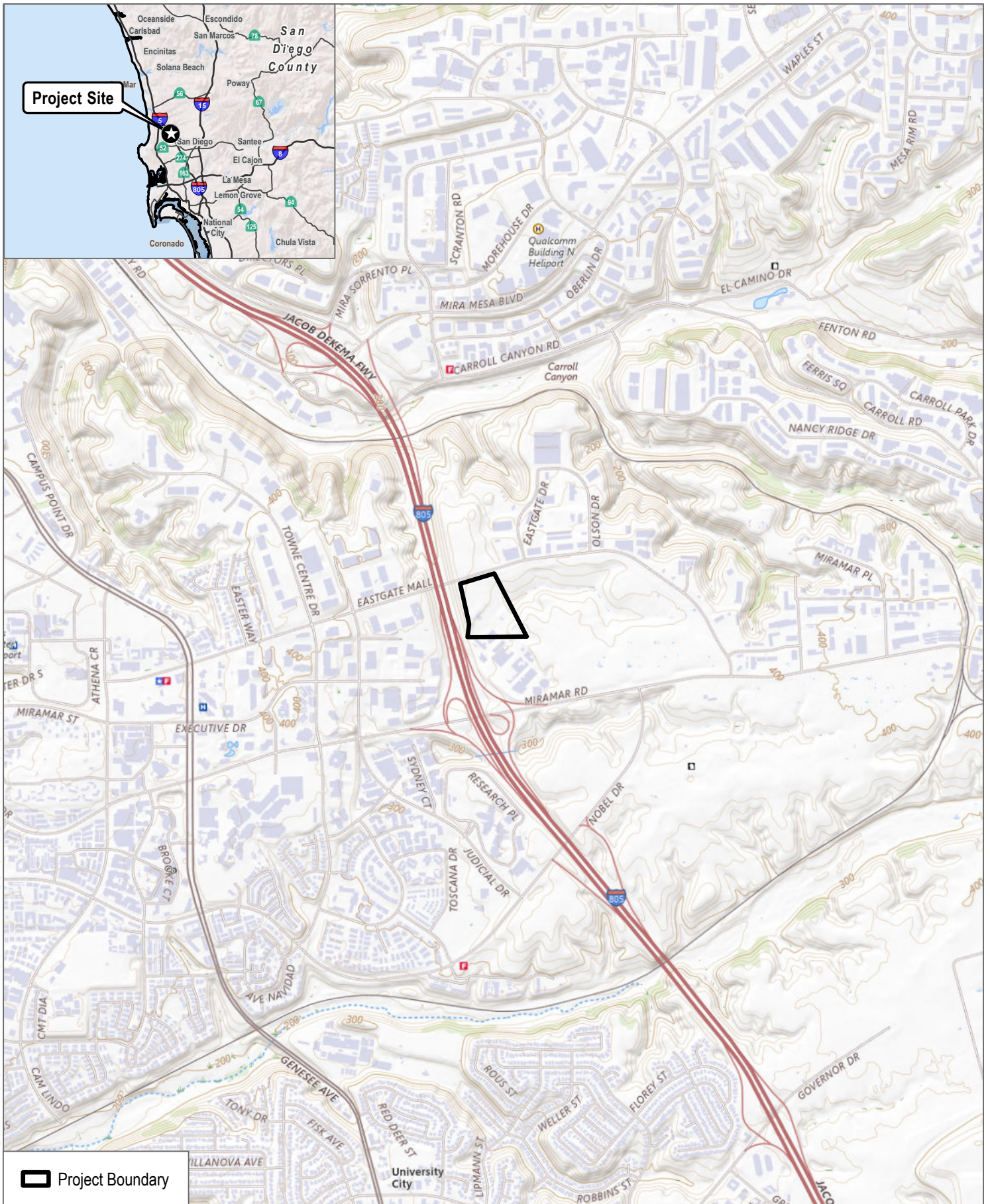
February 13, 2025

Date of Final Report

Analyst: JMKennedy

Attachments:

1. Figure 1: Project Location
2. Figure 2: Project Site
3. Figure 3: Site Plan
4. General Grading Guidelines for Paleontological Resources
5. Environmental Impact Report PTS No. 499621/SCH No. 2016081016

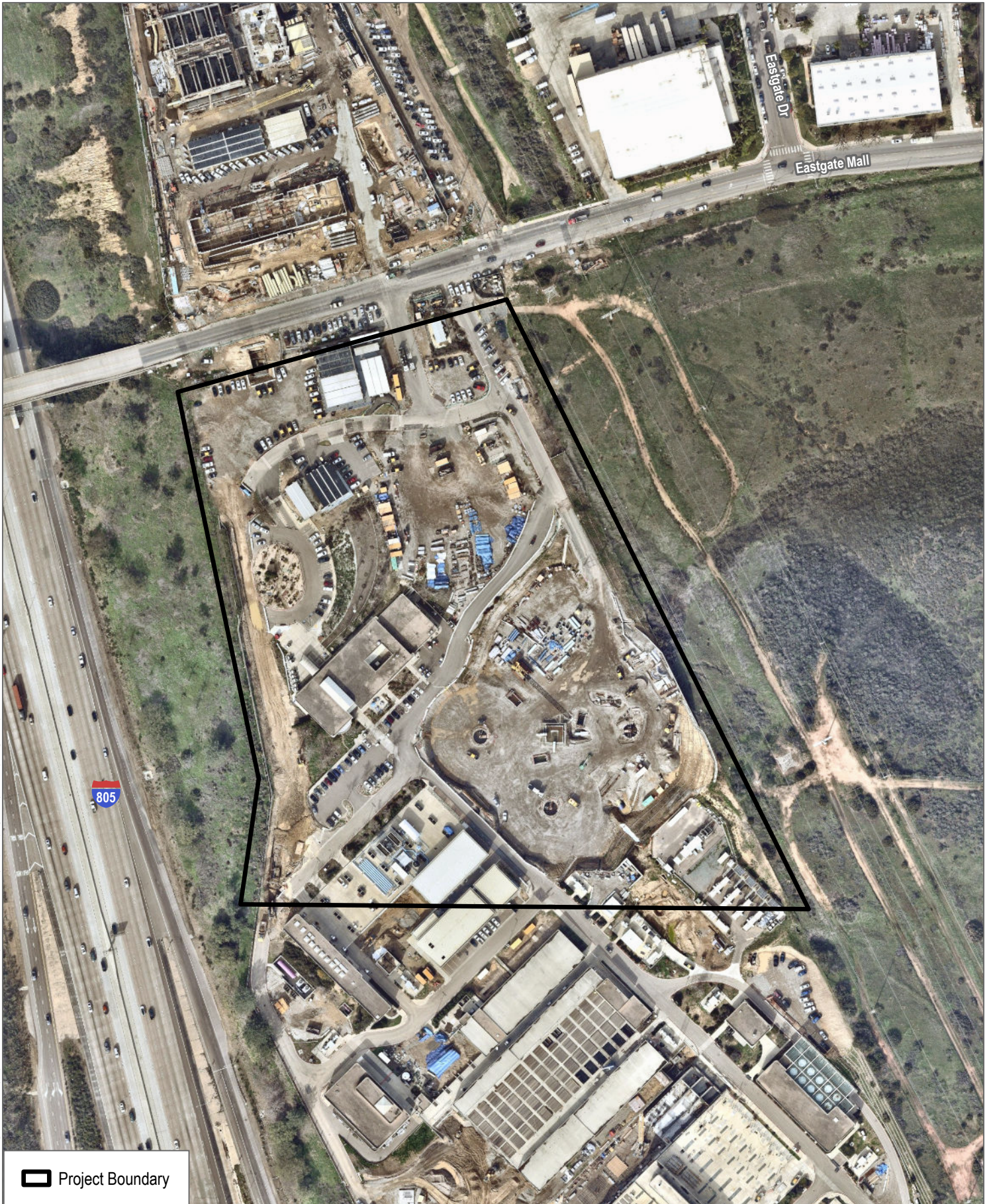


SOURCE: USGS National Map 2024



FIGURE 1
Project Location

Purewater Warehouse Project



 Project Boundary

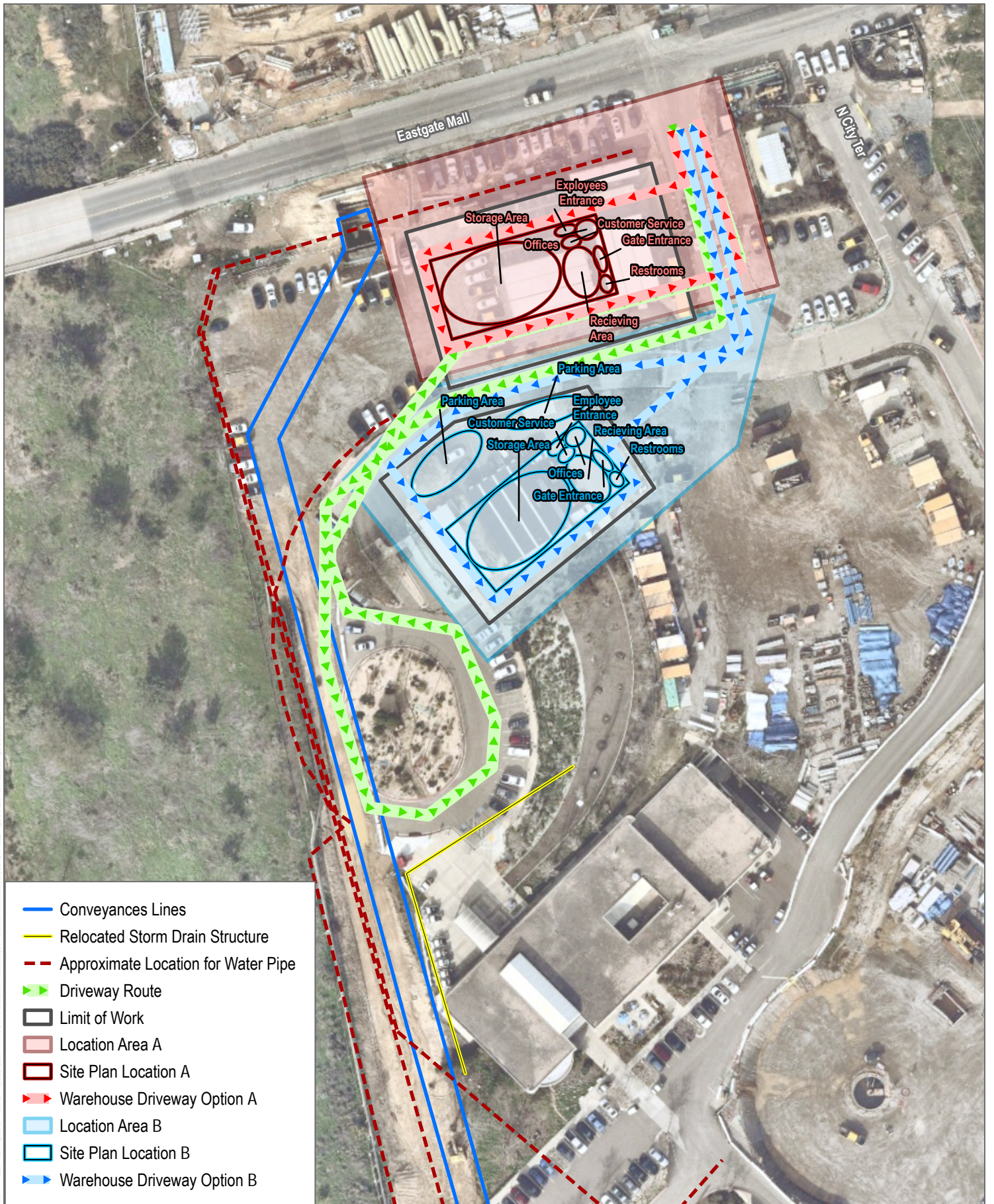
SOURCE: SANGIS 2023

DUDEK 

0 105 210
Feet

FIGURE 2
Project Site

Purewater Warehouse Project



- Conveyances Lines
- Relocated Storm Drain Structure
- - - Approximate Location for Water Pipe
- ▶▶▶ Driveway Route
- Limit of Work
- Location Area A
- Site Plan Location A
- ▶▶▶ Warehouse Driveway Option A
- Location Area B
- Site Plan Location B
- ▶▶▶ Warehouse Driveway Option B

SOURCE: SANGIS 2023

FIGURE 3
Site Plan



The following is the standard monitoring requirement that shall be placed on grading plans and implemented when required pursuant to LDC section 142.0151:

I. Prior to Permit Issuance

Entitlements Plan Check

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 City Engineer (CE) and/or Building Inspector (BI) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

1. The applicant shall submit a letter of verification to Resident Engineer (RE) and/or Building Inspector (BI) identifying the qualified Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program. A qualified PI is defined as a person with a Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.) with demonstrated knowledge of southern California paleontology and geology, and documented experience in professional paleontological procedures and techniques.

2. II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to RE and/or BI that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from the San Diego Natural History Museum, or another relevant institution that maintains paleontological collections recovered from sites within the City of San Diego.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Preconstruction Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, RE, and BI, as appropriate. The qualified paleontologist (PI) shall attend any grading/excavation related Preconstruction 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 Preconstruction Meeting, the Applicant shall schedule a focused Preconstruction Meeting with 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 RE and/or BI 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 geologic conditions (e.g., geologic deposits as listed in the Paleontological Monitoring Determination Matrix below).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to the RE and/or BI indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to RE and/or BI 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 and geotechnical reports which indicate conditions such as depth of excavation and/or thickness of artificial fill overlying bedrock, presence or absence of fossils , 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 paleontological 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 PI, RE and/or BI 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 RE and/or BI during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter previously undisturbed and paleontologically sensitive geologic deposits as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for paleontological resources to be present.

3. The paleontological monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be emailed by the CM to the RE and/or BI the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries.

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 notify the RE and/or BI. The contractor shall also process a construction change for administrative purposes to formalize the documentation and recovery program, including modification to Mitigation Monitoring and Compliance (MMC).
2. The paleontological monitor shall notify the PI (unless paleontological monitor is the PI) of the discovery.
3. The PI shall notify MMC of the discovery, and shall submit documentation to MMC within 24 hours by email with photos of the resource in context.

C. Recovery of Fossils

If a paleontological resource is encountered:

1. The paleontological monitor shall salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary as determined by the PI, plaster-jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits.
2. The paleontological monitor shall record stratigraphic and geologic data to provide a context for the recovered fossil remains, including a detailed description of all paleontological localities within the project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, and photographic documentation of the geologic setting.

V. Post Construction

A. Preparation and Submittal of Draft Paleontological Monitoring Report

1. The PI shall submit two copies of the Draft Paleontological Monitoring Report (even if negative), prepared to the satisfaction of the Development Services Department. The Draft Paleontological Monitoring Report shall describe the methods, results, 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 or potentially significant paleontological resources encountered during monitoring, as identified by the PI, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. 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 (revised November 2017), and submittal of such forms to the San Diego Natural History Museum and MMC with the Draft Paleontological Monitoring Report.
2. MMC shall return the Draft Paleontological Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit revised Draft Paleontological Monitoring Report to MMC for approval.
 4. MMC shall provide written verification to the PI of the approved Draft Paleontological Monitoring Report.
 5. MMC shall notify the RE and/or BI, of receipt of all Draft Paleontological Monitoring Report submittals and approvals.
- B. Handling of Recovered Fossils
1. The PI shall ensure that all fossils collected are cleaned to the point of curation (e.g., removal of extraneous sediment, repair of broken specimens, and consolidation of fragile/brittle specimens) and catalogued as part of the Paleontological Monitoring Program.
 2. The PI shall ensure that all fossils are analyzed to identify stratigraphic provenance, geochronology, and taphonomic context of the source geologic deposit; that faunal material is taxonomically identified; and that curation has been completed, as appropriate.
- C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossils associated with the paleontological monitoring program for this project are permanently curated with an accredited institution that maintains paleontological collections (such as the San Diego Natural History Museum).
 2. The PI shall include an acceptance verification from the curation institution in the Final Paleontological Monitoring Report submitted to the RE and/or BI, and MMC.

D. Final Paleontological Monitoring Report(s)

1. The PI shall submit two copies of the Final Paleontological Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the Final Paleontological Monitoring Report has been approved.
2. The RE and/or BI shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Paleontological Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.

Paleontological Monitoring Determination Matrix

Geological Deposit/Formation/Rock Unit	Potential Fossil Localities	Sensitivity Rating
Alluvium (Qsw, Qal, or Qls)	All communities where this unit occurs	Low
Ardath Shale (Ta)	All communities where this unit occurs	High
Bay Point/Marine Terrace (Qbp) ¹	All communities where unit occurs	High
Cabrillo Formation (Kcs)	All communities where unit occurs	Moderate
Delmar Formation (Td)	All communities where unit occurs	High
Friars Formation (Tf)	All communities where unit occurs	High
Granite/Plutonic (Kg)	All communities where unit occurs	Zero
Lindavista Formation (Qln, Qlb) ²	A. Mira Mesa/Tierrasanta B. All other areas	A. High B. Moderate
Lusardi Formation (Kl)	Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe B. All other areas	A. High B. Moderate
Mission Valley Formation (Tmv)	All communities where unit occurs	High
Mt. Soledad Formation (Tm, Tmss, Tmsc)	A. Rose Canyon B. All other areas where this unit occurs	A. High B. Moderate
Otay Formation (To)	All communities where unit occurs	High
Point Loma Formation (Kp)	All communities where unit occurs	High
Pomerado Conglomerate (Tp)	A. Scripps Ranch/Tierrasanta B. All other areas	High
River /Stream Terrace Deposits (Qt)	A. South Eastern/Chollas Valley/Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro B. All other areas	A. Moderate B. Low
San Diego Formation (Qsd)	All communities where this unit occurs.	High
Santiago Peak Volcanics (Jsp) A. Metasedimentary B. Metavolcanic	A. Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/Peñasquitos B. All other areas	A. Moderate B. Zero
Scripps Formation (Tsd)	All communities where this unit occurs	High
Stadium Conglomerate (Tst)	All communities where this unit occurs	High
Sweetwater Formation	All communities where this unit occurs	High
Torrey Sandstone (Tf)	A. Black Mountain Ranch/Carmel Valley B. All other areas	A. High B. Low