

Draft Initial Study/ Mitigated Negative
Declaration

Annexation and Subdivision of 3410 Valley Road,
Bonita, CA

*Valley View Development
Project*

National City, California

Draft Initial Study/
Mitigated Negative
Declaration
Annexation and Subdivision
of 3410 Valley Road, Bonita,
CA

Valley View Development
Project

Prepared for:
National City Community Development
Department - Planning Division
1243 National City Blvd
National City, CA 91950

May 2023

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List of Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
ACM	Asbestos Containing Materials
ADT	Average Daily Trips
af	Acre-feet
AIA	Airport influence area
APN	Assessor's Parcel Number
ATV	All-Terrain vehicle
BAAQMD	Bay Area Air Quality Management District
BAU	Business-as-Usual
BMP	Best Management Practices
BPS	Best Performance Standards
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CGS	California Geological Survey
CalEEMod	California Emissions Estimator Model [®]
CalFire	California Department of Forestry and Fire Protection
CAP	Clean Air Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAP	Climate Change Action Plan
CCR	California Code of Regulations
CDFSA	California Department Food and Agriculture
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH ₄	Methane
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
DOC	Department of Conservation
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control

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EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHSZ	Flood Hazard Severity Zone
GHG	Greenhouse Gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HMBP	Hazardous Materials Business Plan
HSC	Health and Safety Code
HVAC	Heating, Ventilation, and Air Conditioning
IS	Initial Study
IpaC	Information for Planning and Consultation
LBP	Lead Based Paint
LED	Light-emitting diode
LOS	Level of Service
LST	Localized Significance Threshold
MLC	Mineral Land Classification
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MRP	Monitoring and Reporting Program
MSCP	San Diego Multiple Species Conservation Program
MT	Metric ton
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NHD	National Hydrography Dataset
NOA	Notice of Availability
NSD	National School District
NWI	National Wetland Inventory
N ₂ O	Nitrous Oxide
NO _x	Oxides of Nitrogen
O ₃	Ozone
OHWM	Ordinary High-Water Mark
OPR	California Office of Planning and Research
PM _{2.5}	Particulate Matter Less Than 2.5 Microns in Size
PM ₁₀	Particulate Matter Less Than 10 Microns in Size
PRC	Public Resource Code
RMP	Risk Management Planning
ROG	Reactive Organic Gas
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center

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SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDNHM	San Diego Natural History Museum
SDG&E	San Diego Gas and Electric
sf	Square Foot
SGMA	Sustainable Groundwater Management Act of 2014
SIP	State Implementation Plan
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMAQMD	Sacramento Metropolitan Air Quality Management District
SOP	Standard Operating Procedure
SO _x	Oxides of Sulfur
SR	State Route
SRA	State Responsibility Area
SUHSD	Sweetwater Union High School District
SWQMP	Storm Water Quality Management Plan
SWPPP	Stormwater Prevention Pollution Plan
TAC	Toxic Air Contaminant
USACE	US Army Corps of Engineers
U.S. EPA or USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VMT	Vehicle Miles Travelled
WDR	Waste Discharge Requirement

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1.0 MITIGATED NEGATIVE DECLARATION

As Lead Agency under the California Environmental Quality Act (CEQA), National City reviewed the Valley View Development Project (Proposed Project) described below to determine whether it could have a significant effect on the environment. In accordance with CEQA Guidelines Section 15382, “Significant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

1.1 Project Name

Valley View Development

1.2 APN(s)

591-100-27 and 591-100-31

1.3 Lead Agency Name and Address

City of National City

Community Development Department – Planning Division

1243 National City Blvd., National City, CA 91950

1.4 Lead Agency Staff Contact

Martin Reeder, AICP

Planning Manager

(619) 336-4313

mreeder@nationalcityca.gov

1.5 Project Location

The Proposed Project is located at 3410 Valley Road approximately one mile east of the intersection of California State Route 54 (SR-54) and Interstate 805 (I-805) within the unincorporated community of Bonita. Although the site is currently in the County of San Diego, it will be annexed into National City.

1.6 Project Applicant Name and Address

Laurence Tucker, Loan Partner

Valley View Development, LLC

2577 University Ave

San Diego, CA 92104

1.7 General Plan

Adopted: Semi-Rural Residential (SR-1)

Proposed: Low Medium Density Residential

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1.8 Zoning

Adopted: Rural Residential

Proposed: Small Lot Residential (RS-2)

1.9 Project Description

The City of National City is reviewing an application (Valley View Development Project) for the proposed annexation of two properties (591-100-27 and 591-100-31) located in the County of San Diego's jurisdiction, into the City of National City. The properties are located at 3410 Valley Road in the unincorporated community of Bonita) and are pre-zoned as Small Lot Residential (RS-2). The Applicant (Valley View Development, LLC) is proposing to develop the property as 10 single-family residential lots with a private street connecting the development to Plaza Bonita Center Way. The property will also include a biofiltration basin on-site for stormwater management purposes.

1.10 Discretionary Actions

The Proposed Project will require:

- Tentative Subdivision Map Approval by National City
- Adoption of this Initial Study/Mitigated Negative Declaration (IS/MND)
- Annexation approval from LAFCO and National City

1.11 Findings

The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (see Section 3.0 Construction Activities and Schedule

Prior to ground disturbance, the existing 2,300 square-foot single-family residence on site would be demolished. Debris will be hauled offsite to a local landfill. Grading and clearing of existing vegetation on site would be completed, totaling approximately 1.888 acres. Approximately 1,565 cubic yards would be cut and backfilled with 4,230 cubic yards of fill. Site preparation would result in approximately 43,485 square feet of total new/replaced impervious area, a delta of approximately (+) 40,465 Construction would result in approximately 81,643 square feet of total disturbed area.

Environmental Checklist) identified no potentially significant effects on the environment with incorporation of mitigation measures. The Lead Agency, National City, finds that there is no substantial evidence that this Proposed Project would have a significant effect on the environment with implementation of mitigation measures, and therefore, a Mitigated Negative Declaration (MND) is the appropriate level of environmental documentation for this Proposed Project.

1.12 Mitigation Measures included in the Project to Avoid Potentially Significant Effects

A Mitigation Monitoring and Reporting Program is included in Appendix A.

BIO-1: Pre-construction Avian Survey. If construction occurs within the avian breeding season of February 1 through August 31, a qualified Biologist shall conduct a pre-construction avian nesting survey no more than 3 days prior to the start of construction or grubbing. The pre-

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construction avian survey shall be conducted with a 300-foot buffer of all areas of disturbance. If the survey finds that there is no nesting activity within the area of potential disturbance, clearing and grading activities shall be allowed to proceed. If the survey finds an active nest, then clearing and grading shall not occur within 300 feet of the active nest until nesting activity has been determined complete by the qualified biologist.

BIO-2: Construction Fencing. The drainage shall be protected from direct and indirect impacts by providing a physical barrier between clearing, grading, and construction.

- A temporary silt fence shall be installed along the southern edge of Proposed Project impacts prior to clearing and grading.

BIO-3: Permanent Open Space Easement

A permanent open easement shall be recorded over the on-site drainage channel (Open Space Lot C on the Tentative Map) and shall include the following provisions.

- The open easement area shall be permanently fenced with a three-foot split-rail fence to discourage entry into the drainage.
- Maintenance of the area, including brush management for wildfires and removal of trash and debris, would be the responsibility of the homeowners' association (HOA) and shall be reflected in the Covenants, Conditions and Restrictions (CC&Rs) for the property.
- No vegetative removal within the drainage shall occur during the breeding season without prior consultation of a biologist.
- The area shall be kept free of trash and debris at all times.

CUL-1: Archaeological and/or Native American Monitoring. A qualified archaeological and/or Native American monitor shall be present during construction activities that involve subsurface grading and/or excavation involving the disturbance of native soils more than 3 feet in depth. The monitor(s) would ensure that unanticipated finds are not damaged or destroyed.

CUL-2: Unanticipated Discovery of Archaeological Resources. In the event of an unanticipated discovery of archaeological resources during construction, construction should stop on the site until a qualified archaeologist can survey the resource and determine potential impacts and necessary preservation measures. Any archaeological resources that are found would be identified, adequately documented in the field, and/or preserved, as recommended by a qualified archaeologist.

1.13 CEQA Compliance

CEQA [Public Resources Code §21000 et seq. and Title 14 California Code of Regulations (CCR) §15000 et seq.] requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid, or eliminate significant adverse impacts of these projects be identified and implemented. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment (Public Resources Code §21067).

In accordance with CEQA Guidelines §15002(a), the basic purposes of CEQA are to inform public agency decision-makers and the general public of the significant environmental effects of a project,

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identify possible ways to minimize the significant effects through the use of mitigation measures or alternatives to the project, and disclose to the public the reasons why a government agency approved the project if significant environmental effects are involved.

To fulfill the purpose and intent of CEQA, this Draft IS/MND has been prepared to address the potential adverse environmental impacts associated with the Proposed Project. An IS/MND for a project subject to CEQA is prepared when an environmental analysis of the project shows that there is no substantial evidence that the project may have a significant effect on the environment [CEQA Guidelines §15070(a)]. As discussed in Chapter 3.0 Construction Activities and Schedule

Prior to ground disturbance, the existing 2,300 square-foot single-family residence on site would be demolished. Debris will be hauled offsite to a local landfill. Grading and clearing of existing vegetation on site would be completed, totaling approximately 1.888 acres. Approximately 1,565 cubic yards would be cut and backfilled with 4,230 cubic yards of fill. Site preparation would result in approximately 43,485 square feet of total new/replaced impervious area, a delta of approximately (+) 40,465. Construction would result in approximately 81,643 square feet of total disturbed area.

Environmental Checklist, the Proposed Project is not expected to result in any significant adverse environmental impacts with mitigation and therefore, an IS/MND is the appropriate CEQA document.

Chapter 2.2.3 Construction Activities and Schedule

Prior to ground disturbance, the existing 2,300 square-foot single-family residence on site would be demolished. Debris will be hauled offsite to a local landfill. Grading and clearing of existing vegetation on site would be completed, totaling approximately 1.888 acres. Approximately 1,565 cubic yards would be cut and backfilled with 4,230 cubic yards of fill. Site preparation would result in approximately 43,485 square feet of total new/replaced impervious area, a delta of approximately (+) 40,465. Construction would result in approximately 81,643 square feet of total disturbed area.

Environmental Checklist presents the analysis and discussions for the following areas per the 2022 CEQA guidelines: aesthetics, agricultural/forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas (GHG) emissions, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, and wildfires. The Proposed Project was determined not to have the potential for significant impacts with incorporation of mitigation measures.

1.14 Impact Terminology

The following terminology is used to describe the level of significance of impacts.

- A finding of “no impact” is appropriate if the analysis concludes that the project would not affect a topic area in any way.

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- An impact is considered “less than significant” if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered “less than significant with mitigation incorporated” if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.
- An impact is considered “potentially significant” if the analysis concludes that it could have a substantial adverse effect on the environment.

1.15 Document Organization and Contents

This document has been prepared pursuant to CEQA Guidelines Section 15071, which outlines the required components of a Mitigated Negative Declaration. The report contains the following Chapters:

- Chapter 1 – Introduction: This chapter provides a brief introduction to the project, findings, and mitigation measures of the IS/MND. It also provides an overview of CEQA requirements, and document organization.
- Chapter 2 – Project Description: This chapter describes the Proposed Project and provides details on the existing site conditions.
- Chapter 3 – Environmental Checklist: This chapter contains the evaluation of the environmental resource topics as outlined by 2022 CEQA Guidelines Appendix G. Each resource topic is analyzed to determine whether the Proposed Project would have an impact. If any of the evaluations results in a finding of an unavoidable and significant impact, then an Environmental Impact Report (EIR) would be required.
- Chapter 4 – List of Preparers: This chapter identifies the individuals who prepared the IS/MND.
- Chapter 5 – Appendices: This chapter contains supporting documentation for the preparation of this IS/MND.

2.0 PROJECT DESCRIPTION

2.1 Existing Site Conditions

The existing site is composed of two adjacent parcels (591-100-27 and 591-100-31) located adjacent to Plaza Bonita Center Way in the unincorporated community of Bonita. The site is currently unpaved with landscaping and a 2,300-square foot single family residence on site.

2.1.1 Surrounding Land Use

The site is bordered by residential development to the north and northeast; undeveloped land to the east; undeveloped land and then residential development to the southeast; undeveloped land and then Sweetwater Road to the south; and Plaza Bonita Center Way to the west. The site is abutted to the west by Plaza Bonita Center Way but is separated by a brick wall and sidewalk. Aerial photos of the project site and the vicinity are included in Figures 2 and 3.

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2.1.2 Access/Circulation and Parking

There is currently no direct access from the site to Plaza Bonita Center Way via driveway. A brick wall and sidewalk separate the site from this roadway. A private, paved road maintains access to this site via Valley Road to the north. Vehicles currently park on unpaved portions of the site.

2.1.3 Storm Water Protection

There is approximately 3,020square feet of existing impervious area on site. A drainage canal runs diagonal across the site south of the existing residence. The length of the channel on-site is approximately 239 linear feet. The drainage that is subject to jurisdiction of California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and the Regional Water Quality Control Board (RWQCB).

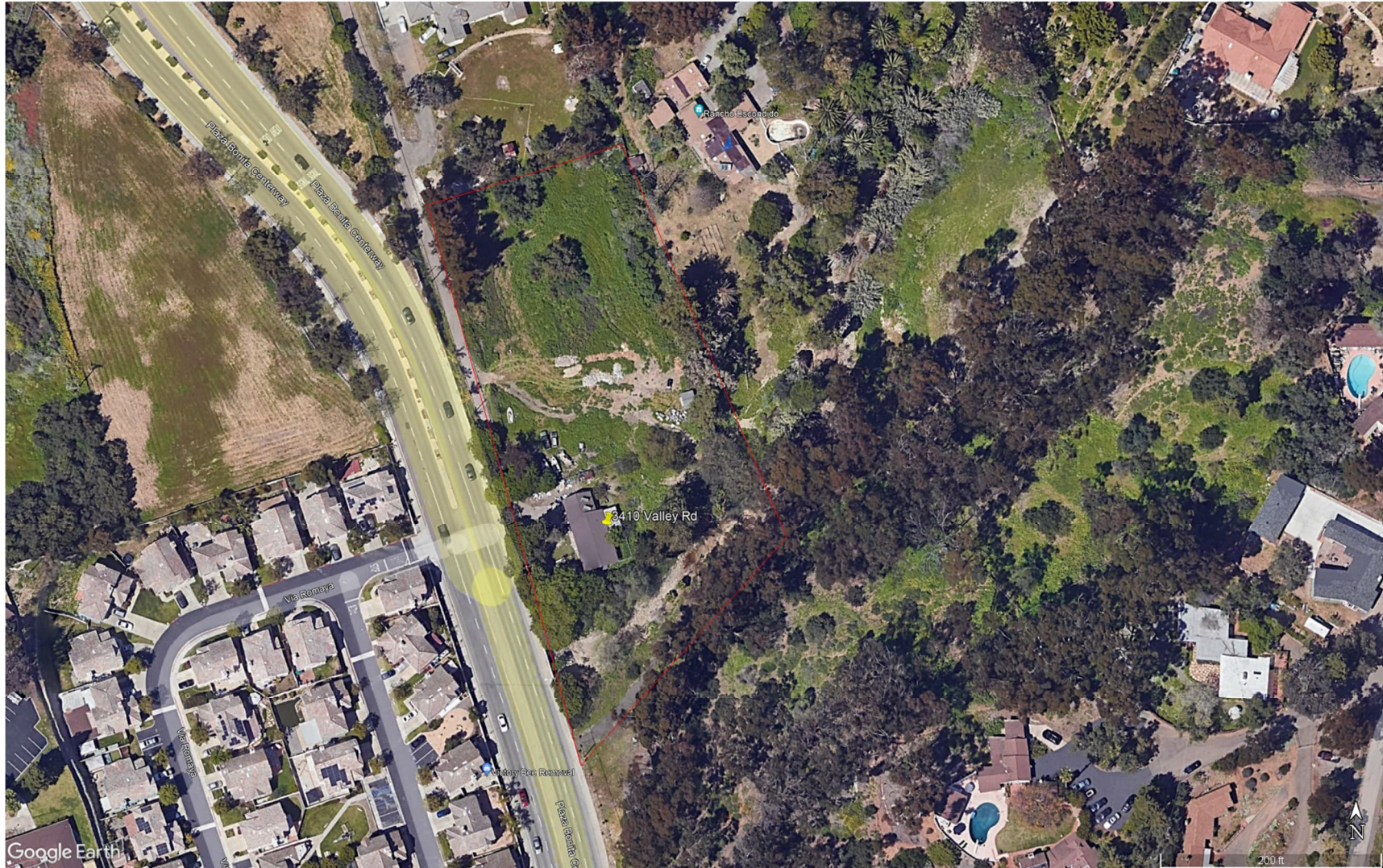
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Figure 1 – Aerial Vicinity



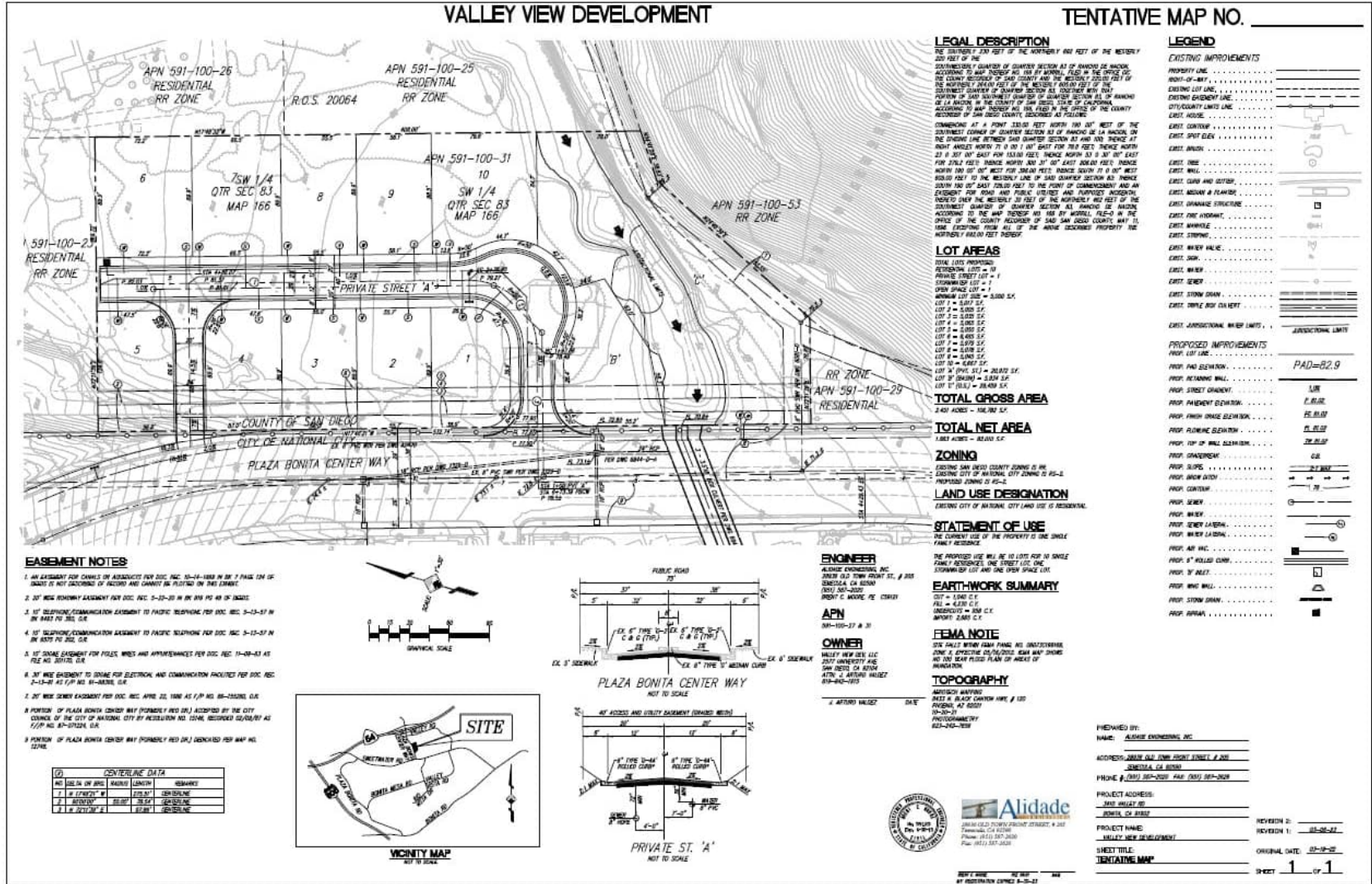
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Figure 2 – Aerial Photo of Project Site



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Figure 3 – Development Plans



2.2 Proposed Project

The Valley View Development, LLC (Applicant) proposes the Valley View Development project (Proposed Project), which would allow for the development of 10 single family residences. The Applicant proposes to annex this site from the unincorporated community of Bonita into the City of National City. The two parcels making up the site would then be split into 13 lots and graded for development. Ten single family residences would be developed on 10 of the lots while the remaining three lots would be developed with a biofiltration basin for stormwater management, open space, and a private road connecting the development to Plaza Bonita Center Way as shown in the development plans in Figure 3. An HOA will be formed to maintain biofiltration basin, private road, and open space.

Table 1. Proposed Lots

Lot Number	Size (Square Feet)	Proposed Use
1	5,017	Single Family Residence
2	5,005	Single Family Residence
3	5,035	Single Family Residence
4	5,065	Single Family Residence
5	5,050	Single Family Residence
6	6,485	Single Family Residence
7	5,979	Single Family Residence
8	5,078	Single Family Residence
9	5,045	Single Family Residence
10	6,667	Single Family Residence
A	20,972	Private Street
B	5,934	Biofiltration Basin
C	6,667	Open Space (Drainage)
Total	106,782	
	(2.451) acres	

2.2.1 Access/Circulation and Parking

The Proposed Project proposes a private street connecting to Plaza Bonita Center Way to the west. The private street would also connect to Plaza Bonita Center Way; however, it would be gated and intended only for fire department egress. A fire department Knox Box will be placed at the gate for emergency access.

2.2.2 Storm Water Protection

The existing drainage would not be impacted by development and would be located in Lot C. A biofiltration basin would be installed on Lot B, adjacent to the existing drainage.

2.2.3 Construction Activities and Schedule

Prior to ground disturbance, the existing 2,300 square-foot single-family residence on site would be demolished. Debris will be hauled offsite to a local landfill. Grading and clearing of existing vegetation on site would be completed, totaling approximately 1.888 acres. Approximately 1,565

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cubic yards would be cut and backfilled with 4,230 cubic yards of fill. Site preparation would result in approximately 43,485 square feet of total new/replaced impervious area, a delta of approximately (+) 40,465. Construction would result in approximately 81,643 square feet of total disturbed area.

3.0 ENVIRONMENTAL CHECKLIST

The environmental checklist provides a standard evaluation tool to identify a project’s adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the Proposed Project.

3.1 General Information

Project Title:	Valley View Development
Lead Agency:	National City Community Development Department – Planning Division 1243 National City Blvd National City, CA 91950
Contact Person and Phone Number:	Martin Reeder, AICP Planning Manager 619.336.4313 mreeder@nationalcityca.gov
Project Location:	3410 Valley Road, Bonita, CA APN 591-100-27 and 591-100-31
Applicant:	Valley View Development, LLC 2577 University Ave San Diego, CA 92104
Contact Person and Phone Number:	Laurence Tucker Work: 619-988-5850 E-mail: Larry@MortgageGoat.com
General Plan Designation:	Low Medium Density Residential
Zoning Designation:	Small Lot Residential (RS-2)
Description of Project:	See Chapter 2
Surrounding Land Uses and Setting:	Single family residential communities and open space. Plaza Bonita Center Way is located to the west of the Project site.
Parking and Access	Driveway from Plaza Bonita Center Way to cul-de-sac.
Electric Utility Service	San Diego Gas and Electric (SDG&E)

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3.2 Environmental Factors Potentially Affected

The following environmental impact areas have been assessed to determine their potential to be adversely affected by the Proposed Project. As indicated by the checklist on the following pages, environmental topics marked with a “✓” may be adversely affected by the Proposed Project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- | | | |
|---------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture/Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

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3.3 Determination

On the basis of this initial evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and that a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required.
- I find that the proposed project MAY have a “potentially significant impact” on the environment, but at least one effect: 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects: 1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards; and 2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature: _____

Date: _____

Martin Reeder, AICP
Planning Manager
National City Community Development Department – Planning Division

3.4 Evaluation of Environmental Impacts

No topical areas on the CEQA environmental checklist were found to have unmitigated impacts exceeding applicable thresholds of significance with mitigation incorporated. All topics on the checklist were determined to have Less Than Significant Impacts with Mitigation Incorporated or No Impacts, as discussed below.

I. Aesthetics

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Impact: No Impact

The Project site is located in unincorporated San Diego County within the National City Sphere of Influence (SOI). The National City General Plan (2011) identifies Gateways as public spaces with recognizable community identity, high quality appearance and/or harmony spaces between existing and new uses. No Gateways were identified within the vicinity of the project. The project site is located in an existing residential area and does not include a scenic vista.

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Therefore, the Proposed Project would have *no impacts* to scenic vistas.

Mitigation Measures: None

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

Impact: No Impact

There are no designated scenic highways or corridors in National City.¹ Therefore, the Proposed Project is not located within a State-designated scenic highway per the Caltrans California Scenic Highway Program.²

The Proposed Project would have *no impact* on scenic resources within a state scenic highway.

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Applicant proposes the annexation of the two subject parcels from the unincorporated community of Bonita into the City of National City. The current General Plan Land Use designation of these parcels is Semi-Rural Residential (SR-1), and zoning designation is Rural Residential (RR)³. Despite this rural zoning designation by the County, the parcels under National City jurisdiction that are adjacent to and that surround the Project site are zoned for Small Lot Residential (RS-2)⁴, as seen in the aerial for the vicinity (see **Error! Reference source not found.**). The Proposed Project proposes also to rezone the site to Small Lot Residential (RS-2). Under this zoning designation, the Proposed Project would be subject to the development regulations governing scenic quality in this area, consistent with neighboring parcels. With rezoning designation of RS-2, the Proposed Project would be in compliance with local development standards and zoning.⁵

Therefore, the Proposed Project would have *less than significant* impacts on conflicts with applicable zoning and local regulations governing scenic quality.

¹ City of National City. 2011. Comprehensive Land Use Update Draft EIR, Aesthetics. <https://www.nationalcityca.gov/community/residents/i-want-to/new-advanced-components/custom-documents-images-calendar/-sortn-EName/-toggle-allpast/-sortd-asc/-folder-467>. Accessed January 6, 2023.

² Caltrans. 2023. California State Scenic Highway System Map. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed January 6, 2023.

³ San Diego County Countywide General Plan Map. 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/2017gpclean-up/Countywide_GPMap.pdf. Accessed January 6, 2023.

⁴ City of National City. Zoning Map. 2023. <https://www.nationalcityca.gov/home/showpublisheddocument?id=23330>. Accessed January 6, 2023.

⁵ City of National City Municipal Code. Title 18. [National City Municipal Code – Title 18 Land Use Code \(nationalcityca.gov\)](https://www.nationalcityca.gov/home/showpublisheddocument?id=23330). Accessed January 10, 2023.

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Mitigation Measures: None

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

Impact: Less than Significant Impact

Existing sources of light and glare in the vicinity of the Proposed Project are similar to those that would be found in any residential area, including the interior and exterior lights of buildings, streetlights, vehicle lights, and lighting visible through windows.⁶ The Proposed Project's sources of light and glare would be consistent with existing sources of light and glare as a residential project and be in compliance with General Plan policies and development regulations, including lighting standards for residential developments.⁷

The Proposed Project would have a *less than significant* impact on creating a new source of substantial light or glare, which could adversely affect day or nighttime views in the area.

Mitigation Measures: None.

⁶ City of National City. 2011. Comprehensive Land Use Update Draft EIR, Aesthetics. <https://www.nationalcityca.gov/community/residents/i-want-to/new-advanced-components/custom-documents-images-calendar/-sortn-EName/-toggle-allpast/-sortd-asc/-folder-467>. Accessed January 6, 2023.

⁷ City of National City Municipal Code. Title 18. [National City Municipal Code – Title 18 Land Use Code \(nationalcityca.gov\)](https://www.nationalcityca.gov/city-code/national-city-municipal-code--title-18-land-use-code). Accessed January 10, 2023.

II. Agriculture and Forestry Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. Agriculture and Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Impact: No Impact

The Project site is not designated as prime, unique, or important farmland per the Department of Conservation's Farmland Mapping and Monitoring Program (FMMP)⁸ The Proposed Project would have *no impact* on conversion of agricultural resources as a residential development within an area zoned for residential uses.

Mitigation Measures: None

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

Impact: No Impact

The Site is not zoned for agricultural uses⁹ and does not have any existing Williamson Act contracts¹⁰ Therefore, the Proposed Project would have *no impact* on conflict with existing zoning for agricultural use or a Williamson Act contract.

Mitigation Measures: None

- c) *Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

Impact: No Impact

There are no forests or timberlands on the site¹¹ Therefore, the Proposed Project would result in *no impacts* to forestland or timberlands.

Mitigation Measures: None

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

Impact: No Impact

There are no forests or timberlands on the site¹² Therefore, the Proposed Project would result in *no impact* on the loss or conversion of forestland.

Mitigation Measures: None

⁸ California Department of Conservation. 2023. Farmland Mapping and Monitoring Program. <https://www.conservation.ca.gov/dlrp/fmmp>. Accessed January 6, 2023.

⁹ California Department of Conservation. 2023. California Important Farmland Finder GIS Map. <https://maps.conservation.ca.gov/dlrp/ciff>. <https://maps.conservation.ca.gov/dlrp/ciff/app/> Accessed January 6, 2023.

¹⁰ California Department of Conservation. 2023. San Diego County Farmland Data, Williamson Act Enrollment Map. <https://gis.conservation.ca.gov/portal/home/group.html?id=b1494c705cb34d01acf78f4927a75b8f#overview>. Accessed January 6, 2023.

¹¹ California Department of Conservation Maps. 2023. DOC Maps: Agriculture. <https://maps.conservation.ca.gov/agriculture/>. Accessed January 10, 2023.

¹² California Department of Conservation Maps. 2023. DOC Maps: Agriculture. <https://maps.conservation.ca.gov/agriculture/>. Accessed January 10, 2023.

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e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Impact: No Impact

There are no agricultural lands or forestlands present on the site¹³ Therefore, the Proposed Project would result in *no impact* to the conversion of farmland or forestland.

Mitigation Measures: None

¹³ California Department of Conservation Maps. 2023. DOC Maps: Agriculture. <https://maps.conservation.ca.gov/agriculture/>. Accessed January 10, 2023.

III. Air Quality

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

The Project site is located within the San Diego Air Basin (SDAB), which is governed by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD develops and administers local regulations for stationary air pollutant sources within the SDAB, and also develops plans and programs to meet attainment requirements for both federal and state ambient air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS], respectively). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the Ambient Air Quality Standards (AAQS) in the SDAB. The current regional air quality plan for San Diego County is SDAPCD’s 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County.¹⁴ The Attainment Plan, which would be a revision to the state implementation plan (SIP), outlines SDAPCD’s plan and control measures designed to attain the NAAQS for ozone. These plans accommodate emissions from all sources,

¹⁴ County of San Diego Air Pollution Control District (ACPD). 2020. Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. [https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20A%20\(Attainment%20Plan\)_ws.pdf](https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/Att%20A%20(Attainment%20Plan)_ws.pdf). Accessed January 30, 2023.

including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (CARB), and the emissions and reduction strategies related to mobile sources are considered in the Attainment Plan and SIP.

Project Emissions Estimation

The Proposed Project operational emissions analysis was performed using the California Emissions Estimator Model[®] (CalEEMod) version 2020.4.0. CalEEMod is the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant and GHG emissions associated with land use projects under CEQA. The model quantifies direct emissions from mobile equipment and vehicle use, as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission factors used in the model – published by the California Air Resources Board (CARB) – include the Pavley standards and Low Carbon Fuel Standard. The model also identifies project design features, regulatory measures, and available mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from the selected measures. As the official assessment methodology for land use projects in California, CalEEMod was relied upon for construction and operational emissions quantification, which forms the basis for the impact analysis.

To capture the most conservative total possible emissions from the Proposed Project, assumptions were inputted and modelled (i.e., assuming full construction and operations). The Proposed Project area for CalEEMod input included 1.26 acres categorized as single-family residential land use type, 0.48 acres categorized as parking other asphalt surface land use type, and 0.29 acres categorized as user defined recreational land use type. This size metric of 2.03 acres was used to compute both construction and operational truck trip rates and vehicle miles traveled (VMT), along with estimated electric power usage. Construction assumptions are included in Appendix C.1, but generally covers activities within demolition and its associated vehicle trips.

Criteria Pollutants from Project Activities

The use of gasoline or diesel fueled equipment and vehicles causes emissions of the criteria pollutants nitrogen oxides (NO_x), reactive organic gases (ROGs), carbon monoxide (CO), sulfur oxides (SO_x), and 10- and 2.5-micron particulate matter (PM₁₀ / PM_{2.5}). Diesel engines also emit diesel particulate matter (DPM) in the form of PM₁₀. Use of architectural coatings (paints) and other materials such as sealants may also emit ROGs.

Results of Construction Criteria Emissions Analyses

Estimated construction emissions from on-road vehicles, clearing/grubbing, demolition of the existing residence, grading, etc. were calculated using CalEEMod, and the CalEEMod outputs are provided in Appendix C.1. Table 2 shows criteria pollutant construction emissions and evaluates these emissions against SDAPCD significance thresholds. For construction activities, the following CalEEMod input variable was calculated:

- 5-month construction schedule (August 2023 through December 2023).

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As shown in Table 2, unmitigated emissions of criteria pollutants from Project construction are below applicable SDAPCD significance thresholds, i.e., Less Than Significant.

Table 2. Construction Emissions Summary and Significance Evaluation

Pollutant	Construction Threshold (tons/year)	Proposed Facility (tons/year)	Exceeds Threshold?
Nox	40	0.61	No
VOC	15	0.51	No
PM10	15	0.061	No
PM2.5	--	0.039	No
SOx	40	1.28E-0.3	No
CO	100	0.65	No

Sources: CalEEMod version 2020.4.0,
Notes:
Tons per year are annual emissions for planned land use.
PM₁₀/PM_{2.5} comprises fugitive dust plus engine exhaust.

Results of Operational Criteria Emissions Analyses

Estimated operational emissions from vehicular trips, electricity, and natural gas consumption were calculated using CalEEMod (CalEEMod outputs are provided in Appendix C.1. Table 3 shows unmitigated criteria pollutant operational emissions and evaluates these emissions against SDAPCD significance thresholds. For operations, the following CalEEMod input variables were calculated:

Table 3. Operational Emissions Summary and Significance Evaluation

Pollutant	Operation Threshold (tons/year)	Proposed Facility (tons/year)	Exceeds Threshold?
Nox	40	0.20	No
VOC	15	6.5	No
PM10	15	1.2	No
PM2.5	--	1.1	No
SOx	40	0.15	No
CO	100	8.5	No

Sources: CalEEMod version 2020.4.0.
Notes:
Tons per year are annual emissions for planned land use.
PM₁₀/PM_{2.5} comprises fugitive dust plus engine exhaust.

Discussion:

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

Impact: Less Than Significant Impact

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The SDAPCD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the Attainment Plan and SIP, prepared by the SDAPCD for the region. Criteria pollutants of primary concern include ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter (including both respirable particulate matter 10 microns or less in diameter [PM₁₀] and fine particulate matter 2.5 microns or less in diameter [PM_{2.5}]), sulfur dioxide (SO₂), and lead. Table 4 identifies federal and state designations of attainment for each criteria pollutant.

Table 4 – SDACPD Attainment Designations

Criteria Pollutant	Attainment Status	
	<i>Federal</i>	<i>State</i>
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Attainment ¹	Nonattainment
Carbon Monoxide	Attainment	Attainment
PM ₁₀	Unclassifiable ²	Nonattainment
PM _{2.5}	Attainment	Nonattainment ³
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

Source: San Diego Air Pollution Control District (SDAPCD). Attainment Status. <https://www.sdapcd.org/content/sdapcd/planning/attainment-status.html>. Accessed January 30, 2023

¹ The federal 1-hour standard of 12 pphm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

² At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

³ The California Air Resources Board (CARB) has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal PM_{2.5} standards, the data completeness requirements for state PM_{2.5} standards substantially exceed federal requirements and mandates and have historically not been feasible for most air districts to adhere to given local resources. APCD has begun replacing most regional filter based PM_{2.5} monitors as they reach the end of their useful life with continuous PM_{2.5} air monitors to ensure collected data meets stringent completeness requirements in the future. APCD anticipates these new monitors will be approved as “CAS” monitors once CARB review the list of approved monitors, which has not been updated since 2013.

Locally, the county of San Diego has generated a Regional Air Quality Strategy (RAQS) to maintain air quality standards by identifying methods of reducing stationary emissions with projected growth. According to RAQs, future projects that are consistent with Land Use designations and within growth models are therefore consistent with San Diego Regional Air Quality Plan. The annexation of the Project into National City would require rezoning designated as Small Lot Residential (RS-2). However, upon compliance review, the proposed project will comply with National City General Plan land use for the area and therefore would comply with Land Use designations.

Therefore, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, and the overall impact would be *less than significant*.

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Mitigation Measures: None

- b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Impact: Less Than Significant Impact

During construction, actions that could potentially increase criteria pollutants could include ozone, from generation of volatile organic compounds from a variety of sources including solvents, combustion of fuels, and pesticides as well as particulate matter from fugitive dust and exhaust emissions during the construction phase would be localized and temporary over the course of approximately 5 months. Operation of the project consists of residential occupancy of the site. Emissions during occupancy could source from combustion of natural gas for water heating, consumer products for cleaning, cosmetics or aerosols, landscaping with non-electric machinery and maintenance of the structures. As shown in Table 2 and 3, Construction and occupancy emissions would not exceed screening level thresholds for any criteria pollutants. Cumulatively, if projects are consistent with federal, state and local air quality plans, then emissions would be below screening-level criteria. Therefore, the project emissions impacts associated with a cumulative net increase of criteria pollutants are *less than significant*.

Mitigation Measures: None

- c) *Expose sensitive receptors to substantial pollutant concentrations?*

Impact: Less Than Significant Impact

Sensitive receptors included in this discussion include schools, hospitals, day-care centers, residences, resident care facilities or any other facilities with health conditions that could adversely impact with declines to air quality. Sensitive receptors identified within 0.5-mile radius of the project site include residences directly adjacent and in the general vicinity. During construction, the project would generate temporary emissions, in the vicinity of sensitive receptors. Diesel particulate matter is considered a primary toxic air contaminant of concern and is anticipated to be generated from construction activities that will require heavy equipment. However, reducing emissions would be accomplished by complying with City of National City Grading Ordinance and SDAPCD Rule 55.¹⁵ The project would be confined to a 5-month construction schedule and would therefore *have less than significant* impacts.

Mitigation Measures: None

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

Impact: Less Than Significant Impact

¹⁵ San Diego County Air Pollution Control District (SDAPCD). 2023. Rule 55 – Fugitive Dust Control. <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-55.pdf>. Accessed May 9, 2023.

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Exhaust from heavy machinery use and solvent use during construction would generate odors. However, construction-related odors would be temporary and would not persist upon project completion. Therefore, impacts are less than significant.

Mitigation Measures: None

IV. Biological Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Methodology

The *Biological Resource Letter Report for the Valley View Project*, prepared by Athena Consulting, was used to identify and address potential impacts to sensitive biological resources. Athena Consulting conducted literature review consisting review of the following:

- Rare and special-status plant and animal species were determined by reviewing California Natural Diversity and Data Base (CNDDDB) records USGS 7.5’ quadrangle (National City) and surrounding quadrangles (La Jolla, La Mesa, El Cajon, Point Loma, Jamul Mountains, Imperial Beach, Otay Mesa)
- Plant and animal occurrence data from the CNDDDB, California Native Plant Society (CNPS), Jepson Flora Project managed by UC Berkely and San Diego Natural History Museum (SDNHM) publications including Amphibian and Reptile Atlas, San Diego County Bird Atlas and San Diego Plant Species in the SDNHM Herbarium Collection
- Recent and historical aerial photographs of the site and surrounding areas
- Soil maps and descriptions from the Web Soil Survey database managed by the United States Department of Agriculture and Soil Survey, San Diego Area California

In addition to the literature review, two surveys were conducted on January 24 and September 16, 2022, to assess general biological resources, such as vegetation, land cover classification, wildlife observations, and jurisdictional waters of the site. Methodology of biological surveys is included in the *Biological Resource Letter Report for the Valley View Project* attached in Appendix C.2.

Existing Conditions

Vegetation and Land Cover

The Proposed Project is located on a partially developed set of parcels that currently has a paved driveway, house, and yard. A drainage channel is located towards the southern end of the Project site. A large California pepper tree and olive trees are present on site.

Figure 4 maps the six vegetation and land cover categories identified on the site. These land cover categories include the following:

- Developed Land – 0.19 acres and includes “Areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. Areas where no natural land

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is evident due to large amounts of debris or other materials being placed upon it may also be considered Urban/Developed (e.g., car recycling plant, quarry).” (Oberbauer et al. 2008). The land cover category has very low value for wildlife and special-status species.

- Disturbed Land – 1.24 acres on site that has “Areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or naturalized vegetation association but continues to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of nonnative plant species such as ornamentals or ruderal exotic species that take advantage of disturbance or shows signs of past or present animal usage that removes any capability of providing viable natural habitat for uses other than dispersal. This land cover category has moderate value for wildlife or special-status species.
- Non-native Vegetation – 0.62 acres on site is characterized of having predominately non-native species that was either introduced or established through human action. Observations from the site survey indicate that this area is not artificially irrigated but receive water from runoff or precipitation.
- Eucalyptus Woodland – 0.23 acres on site has single-species eucalyptus thickets with scattered trees and well-developed shrub understory. Vegetation cover in this land class includes non-native species such as ripgut grass (*Bromus diandrus*), petty spurge (*Euphorbia peplus*), and dwarf nettle. This land cover category has low to moderate value for wildlife or special-status species.
- Southern Willow Scrub – 0.12 acres on site is characterized as sandy, gravelly or rocky fringe with waters or flood channels that have 10% or less vegetation year around. Vegetation found in this land cover include giant reed (*Arundo donax*), sea-fig or freeway iceplant (*Carpobrotus* sp.), smilo grass (*Stipa miliacea* var. *miliacea*), tamarisk (*Tamarix* sp.), and Mexican fan palm (*Washingtonia robusta*). Water lines are variable.
- Non-vegetated Channel – 0.05 acres on site is characterized as dense, broad-leafed, winter deciduous riparian thicket that includes consists of one black willow and two arroyo willows (*Salix lasiolepis*), with an understory of horseweed (*Erigeron canadensis*), castor bean (*Ricinus communis*), dock (*Rumex* sp.), and smilo grass.

Figure 4. Vegetation and Land Cover



Special Status Species

A list of all potential special-status species that could occur at the Project site is located in Appendix C.2. The only sensitive special status species to have a high potential to occur on site is the Cooper's hawk (*Accipiter cooperi*). The Cooper's hawk is found in open riparian, oak, eucalyptus woodland, open forested areas and has a high tolerance for urbanization. Breeding,

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typically from March to mid-June, occurs in trees and lowland foothill canyons and urban areas. No special-status species were observed during the biological surveys.

Raptors are also protected under California Fish and Game Code Section 3503.5. Bird nests and eggs are protected under the California Fish and Game Code Section 3503 and migratory birds, and their nests are protected under the federal Migratory Bird Treaty Act. The site has suitable habitat for foraging and nesting for raptors, non-game birds and migratory birds.

Waters of the US and Wetlands

A *Water Resources Delineation Report* was also prepared by Athena to delineate wetlands jurisdictional to the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW) and the State Resources Control Board as presented by its Regional Water Quality Control Board (RWQCB) (Appendix C.3). Methods include a desktop survey utilizing satellite imagery, US Geological Survey 7.5-minute topographic maps, the National Hydrography Dataset (NHD) and the National Wetland Inventory (NWI) as well as a field component to identify the potential three different jurisdictional boundaries based on field indicators. The Project site has a drainage channel located on the southern edge of the parcel. The drainage channel is under CDFW, USACE and State Water Resources Control Board jurisdiction and is mapped in Figure 5. USACE's jurisdiction was measured using the Ordinary High-Water Mark (OHWM) outer limit, which was observed to be 0.08 acres of non-wetland waters.

The top of bank and outer edge of riparian vegetation was used to map CDFW jurisdiction. The jurisdictional delineation reported that CDFW jurisdictional area includes 0.05 riparian vegetation and 0.16 acres of steamed totaling 0.21 acres.

Approximately 0.19 acres of non-wetland water is under the jurisdiction of the RWQCB Waters of the state is a combination of the area within top of bank and portion of CDFW riparian vegetation.

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Figure 5 – USACE, CDFW and RWQCB Jurisdictional Features



Athena Consulting USACE, CDFW, and RWQCB Jurisdictional Features
VALLEY VIEW DEVELOPMENT

0 20 40 Feet
Source: Google Earth, July 2021 | October 2022

Discussion

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

Impact: Less Than Significant with Mitigation Incorporated

The only sensitive special status species to have a high potential to occur on site is the Cooper's hawk (*Accipiter cooperi*). The Cooper's hawk is found in open riparian, oak, eucalyptus woodland, open forested areas and has a high tolerance for urbanization.

Approximately 0.14 acres of eucalyptus woodland will be impacted during vegetation grubbing during construction. The eucalyptus woodland land cover has low to moderate habitat value for sensitive or special status species. Eucalyptus woodland is characterized as a Tier IV land within the San Diego Multiple Species Conservation Program (MSCP)

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Plan, and under Ordinance No. 10039, which does not require mitigation.^{16,17} Impacts to this habitat type are not significant and would not result in impacts on Cooper’s hawk.

In addition, although not identified as candidate, sensitive, or special status species, the Proposed Project also has suitable habitat for foraging and nesting for raptors, non-game birds and migratory birds. Removal of vegetation and noise during construction could result in impacts to nesting birds. Mitigation Measure BIO-1 addresses potential impacts to nesting birds on the project site. With implementation of MM-BIO-1, the Proposed Project would result in *Less Than Significant Impacts with Mitigation Incorporated*.

Mitigation Measures:

BIO-1: Pre-construction Avian Survey. If construction occurs within the avian breeding season of February 1 through August 31, a qualified Biologist shall conduct a pre-construction avian nesting survey no more than 3 days prior to the start of construction or grubbing. The pre-construction avian survey shall be conducted with a 300-foot buffer of all areas of disturbance. If the survey finds that there is no nesting activity within the area of potential disturbance, clearing and grading activities shall be allowed to proceed. If the survey finds an active nest, then clearing and grading shall not occur within 300 feet of the active nest until nesting activity has been determined complete by the qualified biologist.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife [CDFW] or U.S. Fish and Wildlife Service [USFWS]?*

Impact: *Less Than Significant with Mitigation Incorporated*

Table 2 Existing Land Cover and Impacted Areas

Vegetation/Land Cover (acres)	Existing on Site (Acres)	Impacts Neutral* (Acres)	Impacted On-Site (Acres)	Impacted Offsite (Acres)	Mitigation Ratio (Acres)	Mitigation Required (Acres)
Developed Land	0.19	0.00	0.19	0.03	-	0
Disturbed Land	1.24	0.15	1.09	0.00	-	0
Eucalyptus Woodland	0.23	0.14	0.09	0.00	-	0
Non-native Vegetation	0.62	0.11	0.51	0.00	-	0

¹⁶ County of San Diego. 1997. Multiple Species Conservation Program – County of San Diego Subarea Plan. https://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/SCMSCP/MSCP_County_Subarea_Plan.pdf Accessed January 27, 2023.

¹⁷ County of San Diego. 2023. Ordinance No 10039 (N.S) –An Ordinance Amending Chapter 5 of Division 6 of Title 8 of the San Diego County Code Relating to the Biological Mitigation Ordinance. <https://www.sandiegocounty.gov/content/dam/sdc/cob/ordinances/ord10039.doc> Accessed January 27, 2023.

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Non-vegetated Channel	0.12	0.12	0.00	0.00	≥2:1	0
Southern Willow Scrub	0.05	0.05	0.00	0.00	≥2:1	0
TOTAL	2.45	0.57	1.88	0.03		0

Source: Athena Consulting, Valley View Development Project Biological Resource Letter Report, October 2022

*Impact Neutral applies to the drainage channel, which must be avoided, and the unusable strip of land along the southern edge of the drainage.

Direct impacts to Developed Land, Disturbed Land, Eucalyptus Woodland, and Non-native Vegetation are not significant and do not require mitigation, as shown in Table 2.

The two sensitive land cover categories, Non-vegetated Channel and Southern Willow Scrub would not be impacted by the Proposed Project.

The drainage channel on site has riparian and non-wetlands under the jurisdiction of CDFW and USFWS, as shown in Figure 5. The drainage channel is characterized as Non-vegetated Channel, with gravelly or rocky fringe with waters or flood channels that have 10% or less vegetation year around. Vegetation found in this land cover include giant reed (*Arundo donax*), sea-fig or freeway iceplant (*Carpobrotus sp.*), smilo grass (*Stipa miliacea var. miliacea*), tamarisk (*Tamarix sp.*), and Mexican fan palm (*Washingtonia robusta*). This land cover is characterized as high value, for it can be a water supply for wildlife and water-dependent plants.

No construction would occur within the drainage channel; however, during construction, it could be indirectly impacted from sediment or contaminant runoff during construction. The implementation of Best Management Practices (BMP), as identified by a Storm Water Quality Management Plan (SWQMP), would reduce indirect impacts. BMPs and the (SWPPP) would specifically include mandatory measures to prevent any movement of water, soils, or any material from the construction area into the drainage channel or off-site areas. These BMPs may include installation of silt fence and protective fencing between the drainage jurisdictional limits and ground disturbance during grading and construction and use of biofiltration basins to catch site runoff. All applicable construction BMPs and non-storm water discharge BMPs shall be implemented in accordance with City of National City minimum BMP requirements as included in the Municipal Code and Jurisdictional Runoff Management Program (JRMP). Drainage channels are also protected under National City General Plan Policy OS-2.2, which states:

Preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by working with California Department of Fish and Game to establish a plant palette that is satisfactory and providing for up to 100-foot buffers that protect against development impacts but allow for existing uses and limited future recreational uses.

Mitigation Measure BIO-2 has been identified to comply with National City General Plan Policy OS-2.2 and to reduce indirect impacts to the drainage from construction activities.

After construction, indirect impacts to state jurisdictional non-wetland and wetland features could occur including trespassing, deposition of trash and removal of vegetation

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for brush management during the breeding season. MM-BIO-3 would address indirect impacts from encroachment of residents by establishing a permanent open space easement on Open Space Lot C (the drainage area). The open space easement would prescribe the on-going maintenance responsibilities for the area within the drainage.

Therefore, the Proposed Project would result in *Less Than Significant Impacts with Mitigation Incorporated*.

Mitigation Measures:

BIO-2: Construction Fencing The drainage shall be protected from direct and indirect impacts by providing a physical barrier between clearing, grading, and construction.

- A temporary silt fence shall be installed along the southern edge of Proposed Project impacts prior to clearing and grading.

BIO-3: Permanent Open Space Easement

A permanent open easement shall be recorded over the on-site drainage channel (Open Space Lot C on the Tentative Map) and shall include the following provisions.

- The open easement area shall be permanently fenced with a three-foot split-rail fence to discourage entry into the drainage.
- Maintenance of the area, including brush management for wildfires and removal of trash and debris, would be the responsibility of the homeowners' association (HOA) and shall be reflected in the Covenants, Conditions and Restrictions (CC&Rs) for the property.
- No vegetative removal within the drainage shall occur during the breeding season without prior consultation of a biologist.
- The area shall be kept free of trash and debris at all times.

c) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Impact: *Less Than Significant Impacts with Mitigation Incorporated*

There are jurisdictional federal non-wetland and wetland features present on the subject property. No construction, removal of federal or state riparian or wetland habitat, or filling will be required from the Proposed Project. Direct impacts would not result from construction of the project because all development would be located outside the channel. However, indirect impacts during construction and operation, as described above in section b, can occur. Mitigation measures MM-BIO-2 and MM-BIO-3 have been identified to reduce indirect impacts to construction and operation.

Therefore, the Proposed Project would result in *Less Than Significant Impacts with Mitigation Incorporated*.

No Impacts.

Mitigation Measures:

BIO-2 Construction Fencing

BIO-3: Permanent Open Space Easement

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact: No Impact

The Project site is located in a residential area that is mostly developed and therefore could not serve as a wildlife corridor. The drainage channel could serve as a potential wildlife corridor; however, it does not provide connections to large and undisturbed blocks of habitat. The existing disturbed and developed conditions of the Project site also make it a poor candidate for a wildlife nursery. Therefore, there would be *no impact* to wildlife corridors and wildlife nurseries.

Mitigation Measures: None

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

Impact: Less than Significant Impact

Ordinances regarding tree preservation on private property for National City are outlined in Chapter 18.44 in the National City Urban Forest Management Plan¹⁸. Per the section 18.44.120 Tree Preservation, “All trees over eight inches caliper shall be identified on the site plan and landscape plan with notations of trees to be preserved and trees to be removed”.

A large California pepper tree and olive trees are present on site. It is anticipated that all trees within the development area will be removed. Upon approval of the application, a landscaping plan will be submitted as part of the site plan review and will include all the requirements outlined in Landscaping Plan Ordinance 18.44.040. By conforming with local tree ordinance policies, the Proposed Project will have *less than significant impact*.

For trees within the open space easement, the applicant shall comply with tree preservation requirements in Section 18.44.120 of the National City Code and will include the following items:

1. All native trees within the OSE area shall be protected during construction through the use of construction fencing at or beyond the drip line of the tree or trees to be preserved, and/or silt fence and construction fence at or beyond the limit of the area to be preserved.
2. To protect and encourage the continued health and vitality of the preserved trees, the ground within the drip line shall be kept in a natural state. Storage of soils, construction equipment or other materials during or after construction within the tree dripline is prohibited.

¹⁸ National City. 2019. Draft National City Urban Forest Management Plan.
<https://www.nationalcityca.gov/home/showpublisheddocument?id=24995>. Accessed January 19, 2023.

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3. If non-native trees growing within the OSE area are to be removed in the future for purposes of riparian habitat enhancement, such removal must be done under supervision of a qualified biologist and after determining whether permits are required from the water resource regulatory agencies (USACE, CDFW, and RWQCB).

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Proposed Project is currently within the boundaries of unincorporated San Diego County, which is under coverage of the South County Plan of the Multiple Species Conservation Program (MSCP). Section 9.19 of the March 1998 MSCP Implementing Agreement (Implementing Agreement)¹⁹ addresses annexation of lands and states the following:

To the extent permitted by law, the County [County of San Diego] shall enforce the terms of the Take Authorization, Subarea Plan and this Agreement as to all persons or entities subject to its jurisdiction in the event of the de-annexation of a parcel of land located within another Jurisdiction. In all other cases, the Take Authorization shall not apply to any de-annexed lands unless and until the Take Authorization, the Subarea Plan and, if appropriate, this Agreement are amended to include the de-annexed lands. In the event land within the County's jurisdiction is annexed to another jurisdiction, an agreement shall be reached between the County, the annexing jurisdiction, USFWS, and CDFG, as part of the annexation process, to ensure that any development of the annexed lands proceeds in accordance with the conservation goals of the MSCP (and, if the annexing jurisdiction is a Participating Local Jurisdiction, the goals of the Jurisdiction's Subarea Plan) and sets forth the resulting responsibilities pursuant to the MSCP for ongoing maintenance and enforcement of the terms of this agreement and the MSCP as it relates to the annexed land. Amendment of the Annexing jurisdiction's Take Authorization may be required in certain instances.

Therefore, as part of the annexation process, National City shall conduct a MSCP consistency review agreement with San Diego County, USFWS, and CDFW to identify resulting responsibilities, ongoing maintenance and enforcement of the Implementing Agreement. Upon MSCP consistency review agreement approval, no conflicts will occur to MSCP and therefore there would be *less than significant* impacts.

Mitigation Measures: None

¹⁹ San Diego County. 2023. Multiple Species Conservation Programs - South County Plan. <https://www.sandiegocounty.gov/content/sdc/pds/mscp/sc/docsmaps.html#docs>. Accessed January 19, 2023.

V. Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Methodology

The *Cultural Resources Survey for the Valley View Development Project*, prepared by Laguna Mountain Environmental, Inc. was used to determine if significant cultural resources were present within the project area to determine impacts (Appendix C.4). The archaeological survey consisted of a records search and field survey.

Records Search

A records and literature search for the Proposed Project was conducted at the South Coastal Information Center (SCIC) at San Diego State University (See Appendix C.4). The records search included a one-mile radius of the Project site to provide background on the types of sites that would be expected in the region. The search indicated that the Project site has not previously been surveyed but only cursorily inspected for a cell tower placement project. At least 49 previous cultural investigations have been documented within one mile of the Proposed Project. As a result of these studies, 28 cultural resources have been identified within a one-mile radius of the Project site, but none within the Project site itself. All but three of these are historic resources. The historic resources include 12 residences, a memorial park and associated buildings and cemetery, a commercial building, a club house, a bridge, an irrigation dam, a water guzzler, and an olive tree. The three prehistoric resources consist of a lithic and shell scatter, a shell scatter, and an isolated stone flake.

Field Survey

A field survey of the Project site was conducted on September 12, 2022, under the direction of a Project Archaeologist, accompanied by a Native American monitor. The entire Project site was surveyed in 5 to 10-meter transect intervals. Special attention was given to soil exposures. No prehistoric cultural resources were observed within the Project site. Surface

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visibility was good, averaging approximately 70 percent. The cultural resources study noted that the Project site includes alluvial soil deposits where cultural resources could be buried.

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

Impact: No Impact

As stated above, the records and literature search of the project included a one-mile radius resulting in 28 cultural resources, with 25 of these categorized as historic resources. The records and literature search indicated that no historic structures appear within the Project site on early maps and aerial photographs. As summarized from field reconnaissance conducted in the cultural survey, areas appear to have been mechanically leveled in the past with a lack of surface historic or prehistoric material, indicating that no cultural resources are likely present in the project area. The Proposed Project would develop within the boundaries of the two lots. Therefore, the Proposed Project would have *no impact* on the significance of a historical resource.

Mitigation Measures: None

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

Impact: Less than Significant Impact with Mitigation Incorporated

Although no known archaeological sites or resources are known to be located at the Project site per the cultural resource survey, alluvial soil deposits underlie the Project site, where unknown pre-historic and historic cultural resources could be buried. Therefore, project construction has the potential to result in impacts to unknown sub-surface resources. Archaeological and Native American construction monitoring is required during all earth disturbing activities (MM-CUL-1).²⁰ In the event of an unanticipated discovery of archaeological resources during construction, construction should stop on the site until a qualified archaeologist can survey the resource and determine potential impacts and necessary preservation measures (MM-CUL-2).

Therefore, the Proposed Project would have *less than significant impacts with mitigation incorporated* on the significance of an archeological resource.

Mitigation Measures:

CUL-1 Archaeological and/or Native American Monitoring. A qualified archaeological and/or Native American monitor shall be present during construction activities that involve subsurface grading and/or excavation involving the disturbance of native soils more than 3 feet in depth. The monitor(s) would ensure that unanticipated finds are not damaged or destroyed.

CUL-2 Unanticipated Discovery of Archaeological Resources. In the event of an unanticipated discovery of archaeological resources during construction, construction should stop on the site until a qualified archaeologist can survey the resource and determine

²⁰ Laguna Mountain Environmental, Inc. 2022. Cultural Resource Survey for the Valley View Development Project, Bonita, San Diego County, California.

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potential impacts and necessary preservation measures. Any archaeological resources that are found would be identified, adequately documented in the field, and/or preserved, as recommended by a qualified archaeologist.

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

Impact: Less than Significant Impact

The Proposed Project is not located on or near any known burial sites. Per the cultural resource survey, the Project site includes alluvial soil deposits, where unknown pre-historic and historic cultural resources could be buried, including a potential for unknown human remains.²¹ Archaeological and Native American construction monitoring is recommended during ground disturbance activities (MM-CUL-1 and MM-CUL-2).

In the unlikely event that human remains are discovered during ground disturbance, the provisions set forth in Public Resource Code (PRC) section 5097.98 and State Health and Safety Code section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant, as identified by the California Native American Heritage Commission (NAHC). No further construction activities would be permitted until the coroner is contacted, as well as any applicable Native American tribes. The City is required to comply with the California Native American Graves Protection and Repatriation Act (2001), the federal Native American Graves Protection and Repatriation Act (1990), and AB 52 early consultation requirements. As regulations are in place to treat any inadvertent uncovering of human remains during grading, impacts to human remains would be *less than significant*.

Mitigation Measures:

CUL-1: Archaeological and/or Native American Monitoring

CUL-2: Unanticipated Discovery of Archaeological Resources

²¹ San Diego State University South Coastal Information Center. 2022. National City Cultural Resources Records Search.

VI. Energy

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy?*

Impact: Less than Significant Impact

The Proposed Project will utilize standard consumption of energy resources for residential development during project construction and operation. Project energy consumption will comply with the City’s General Design and Development Regulations (Municipal Code Title 18 Division 4)²² and mandatory energy requirements such as CALGreen²³ and the California Energy Code (Title 24, Part 6 of the CCR)²⁴, along with applicable GHG reduction measures in the City’s Climate Action Plan²⁵, which collectively contain energy efficiency requirements for all new developments.

The Proposed Project would therefore result in *less than significant impacts*.

Mitigation Measures: None

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

²² National City Municipal Code. 2023. Title 18 Division 4. https://library.municode.com/ca/national_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT18ZO_DIV4GEDEDERE. Accessed January 23, 2023.

²³ California Green Building Standards Code – Part 11, Title 24, California Code of Regulations – CalGreen. <https://www.dgs.ca.gov/BSC/CALGreen>. Accessed January 23, 2023.

²⁴ California Energy Commission, California Energy Code – Title 24, Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards>. Accessed January 23, 2023.

²⁵ City of National City Climate Action Plan. 2011. <https://www.nationalcityca.gov/home/showpublisheddocument/23170/637120864517930000>. Accessed January 12, 2023.

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Impact: Less than Significant Impact

Project energy consumption will comply with the City's General Design and Development Regulations (Municipal Code Title 18 Division 4)²⁶ and mandatory energy requirements such as CALGreen²⁷ and the California Energy Code (Title 24, Part 6 of the CCR)²⁸, along with applicable GHG reduction measures in the City's Climate Action Plan²⁹, which collectively contain energy efficiency requirements for all new developments.

The Proposed Project would therefore result in *less than significant impacts*.

Mitigation Measures: None

²⁶ National City Municipal Code. 2023. Title 18 Division 4. https://library.municode.com/ca/national_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT18ZO_DIV4GEDEDERE. Accessed January 23, 2023.

²⁷ California Green Building Standards Code – Part 11, Title 24, California Code of Regulations – CalGreen. <https://www.dgs.ca.gov/BSC/CALGreen>. Accessed January 23, 2023.

²⁸ California Energy Commission, California Energy Code – Title 24, Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards>. Accessed January 23, 2023.

²⁹ City of National City Climate Action Plan. 2011. <https://www.nationalcityca.gov/home/showpublisheddocument/23170/637120864517930000>. Accessed January 12, 2023.

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VII. Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Methodology

The *Geotechnical Investigation Proposed Residential Subdivision Site* (“Geotechnical Investigation”) prepared by Allied Earth Technology was used to identify potential impacts of the Proposed Project on existing subsurface geotechnical conditions. An exploratory phase was performed on September 17, 2022, by Allied Earth Technology, which included reconnaissance and excavation of five exploratory trenches with Case 580 backhoe equipped with a 24-inch bucket. Soils were visually and texturally classified by field technician and laboratory samples were collected to evaluate engineering characteristics. The full Geotechnical Investigation is included in Appendix C.5.

Existing Conditions

The region is within the Peninsular Range Geomorphic Province, which is characterized by Mesozoic igneous and metamorphic rocks in the mountainous terrain to the east and late Cretaceous low-laying coastal terraces to the west. The Project site is underlain by late to middle Pleistocene old alluvial flood-plain deposits, likely in the San Diego Formation³⁰, which were encountered to be dense to very dense dark brown clayey sands in the exploratory trenches. The formation is well known for its rich fossil beds that have yielded extremely diverse assemblages of marine species and rare remains of terrestrial mammals, and therefore has been assigned a high paleontological sensitivity.³¹ Exploratory trenches were made to a maximum depth of 8 feet below ground surface. No groundwater was encountered. In general, the City is characterized with a series of active and potentially active Quaternary-age faults zones that are in the northerly to northwesterly direction. However, no evidence of faulting was observed during surface reconnaissance nor referenced in geologic literature for the Project site.

- a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:*
 - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
 - ii. *Strong seismic ground shaking?*

³⁰ Mira Costa College. 2017. National City, CA 7.5' Quadrangle. https://gotbooks.miracosta.edu/fieldtrips/san_diego_maps/san_diego_maps/maps_geology/national_city.html. Accessed January 30, 2023.

³¹ San Diego Natural History Museum. 2013. Appendix M Paleontological Resources Assessment for the Old Town San Diego and Midway-Pacific Highway Corridor Community Plan Updates. https://www.sandiego.gov/sites/default/files/appendix_m_paleontological_resource_assessment_0.pdf. Accessed January 30, 2023.

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- iii. *Seismic-related ground failure, including liquefaction?*
- iv. *Landslides?*

Impact: Less than Significant Impact

The following conclusions of the Geotechnical Investigation are as follows:

- i) The nearest faults to the Project site are the Rose Canyon and Newport-Inglewood Faults, located approximately 6.4 miles away. The Project site is not located in a known Alquist-Priolo Earthquake Fault zone area.³² The Proposed Project would not directly or indirectly cause substantial adverse effects as it relates to faults as no evidence of faults were observed at the Project site. Therefore, the Proposed Project would result in *less than significant impacts*.
- ii) Conformance with project-specific geotechnical recommendations (as noted in the Geotechnical Investigation, Appendix C.5), along with local building code requirements would minimize impacts from future potential ground shaking on residents. Impacts would be *less than significant impact*.
- iii) Due to the soil types encountered during the geotechnical investigation and distance of groundwater from active faults, there is a low potential for soil liquefaction. Therefore, impacts would be *less than significant impact*.
- iv) The Proposed Project is located on generally flat terrain and would not change slopes in a way that would result in landslides. Geotechnical literature did not indicate evidence of historical landslides in the area. Therefore, impacts would be *less than significant*.

Mitigation Measures: None

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

Impact: Less Than Significant Impact

The construction of the Proposed Project is not anticipated to result in substantial soil erosion or loss of topsoil as this infill development would take place on an existing developed lot. Earthwork would be accomplished in accordance with the City's Grading Ordinance and the current edition of the California Building Code. BMPs as noted in the Stormwater Quality Management Plan (Appendix C.6) and Geotechnical Investigation (Appendix C.5), would be implemented to reduce erosion potential. Therefore, impacts would be *less than significant*.

Mitigation Measures: None

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

Impact: Less Than Significant Impact

³² State of California Department of Conservation. 2023. Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 20, 2023.

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The Proposed Project is not located on an unstable geologic unit that could cause lateral spreading, subsidence, liquefaction, or collapse, nor is it located on a geologic unit that could become unstable as a result of the Proposed Project. Therefore, *impacts are less than significant*.

Mitigation Measures: None

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

Impact: Less than Significant Impact

According to the Geotechnical Investigation, the soils encountered at the Project site have high expansion potential, with an expansion index of 95. Earthwork and design recommendations to address expansive soils is included in the Geotechnical Investigation (Appendix C.5). Therefore, conformance with the geotechnical project-specific recommendations would reduce *impacts to less than significant*.

Mitigation Measures: None

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

Impact: No Impact

The Proposed Project would connect to existing municipal wastewater services and therefore would not require the installation of septic tanks or alternative disposal systems. Therefore, *no impacts* would result relative to wastewater disposal.

Mitigation Measures: None

f) *Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Impact: Less than Significant Impact

Any proposed ground-disturbing activities that extend into previously undisturbed native soils have the potential to cause impacts to unknown paleontological resources. As discussed in the Geotechnical Investigation, the project site was underlain with late to middle Pleistocene old alluvial flood-plain deposits consistently two feet and below for all exploratory borings. According to Draft National City Final General Plan Update (FGPU), the Pleistocene-age deposits are determined to be low paleontological sensitivity³³. Excavation into native soils is unlikely to unearth paleontological resources.

Therefore, there is a *less than significant impact*.

Mitigation Measures: None

³³ City of National City. 2023. Draft Supplemental Program Environmental Impact Report for the National City Focused General Plan Update. <https://fc.nationalcityca.gov/ui/core/index.html?mode=public&shareto=#expl-tab1:SHARED!2yAGd7IE9m3FHVvx86BTN/cJdt8Im0dD0Rrz4E>. Accessed May 11, 2023.

VIII. Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Greenhouse Gas Emissions from Project Construction and Operation

GHGs – primarily carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), collectively reported as carbon dioxide equivalents (CO₂e) – are directly emitted from stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces. Operational GHGs are also emitted from mobile sources such as on-road vehicles and off-road equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Also included in GHG quantification is electric power used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills³⁴.

Using CalEEMod, direct on-site and off-site GHG emissions were estimated for project construction and operation, and indirect off-site GHG emissions were estimated to account for electric power used by the Proposed Project, water conveyance, and solid waste disposal.

Results of Greenhouse Gas Emissions Analysis

Using CalEEMod, direct on-site and off-site GHG emissions were estimated for project construction and operation, and indirect off-site GHG emissions were estimated to account for electric power used by the Proposed Project, water conveyance, and solid waste disposal.

Table 3 shows GHG emissions from construction. Table 4 shows GHG emissions from operations.

³⁴ California Air Resources Board (CARB). 2017. California’s 2017 Climate Change Scoping Plan. Website (<https://ww3.arb.ca.gov/cc/scopingplan/scopingplan.htm>). Accessed October 14, 2020.

Table 3. Greenhouse Gas Emissions – Unmitigated Construction

	Project Construction (MT/year)
CO _{2e}	110.6
Sources: SCAQMD, CalEEMod version 2020.4.0.	
<u>Notes:</u> Comprises annual construction emissions (non-zero).	

Table 4. Greenhouse Gas Emissions – Unmitigated Operational

	Project Operations (MT/year)
CO _{2e}	309.4
Sources: SCAQMD, CalEEMod version 2020.4.0.	
<u>Notes:</u> Comprises annual operational emissions (non-zero).	

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

Impact: Less than Significant Impact

Currently, San Diego County does not have screening criteria for greenhouse gases. The Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds published in April 2020 Greenhouse Gas Thresholds report was used to determine significance. The report determined that projects estimated to generate less than 1,100 MT CO_{2e} per year would not result in a significant, cumulative impact³⁵. This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 (SB 32) and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions. The project GHG emissions from land development was calculated using the CalEEMod. Results from the CalEEMod indicate that construction and operation are estimated to be 420 (MT/year).

Therefore, due to GHG emissions being below thresholds for air quality, there would be a *less than significant impact*.

Mitigation Measures: None

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

Impact: Less than Significant Impact

³⁵ Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed May 10, 2023.

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Several policies and plans have been adopted to address greenhouse gas (GHG) emission impacts from development including (1) Title 24 California Building Code, Part 6 establishes California Energy Efficiency Standards for residential and non-residential buildings to reduce energy consumption, (2) Title 24, Part 11 California Green Building Standards, (3) Senate Bill 375 which requires local agencies to adopt planning strategies for GHG, and (4) City of National City Final Climate Action Plan (CAP)

As stated above in section a, the project will not result in significant cumulative impacts to greenhouse gas emissions. The project has design features to reduce impacts associated with GHGs and will meet the following standards:

- California Code of Regulations 2019 Title 24, Part 6 California energy efficiency standards
- The project is consistent with compound annual growth rates for residential uses established through the City of National City CAP. As such the project will be consistent with City of National City goals and comply with New Construction Community-Wide Measures.

Therefore, the Project would not conflict with applicable plans, policies, or regulations of an agency adopted for the purpose of reducing the emissions of GHGs, and there would be a *less than significant impact*.

Mitigation Measures: None

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IX. Hazards and Hazardous Materials

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Impact: Less than Significant Impact

There is no expectation of the transport, use, and disposal of hazardous materials associated with the Proposed Project above and beyond hazardous materials typical of a residential household. Management of hazardous wastes and materials associated with standard residential construction would be in compliance with local and State regulations.³⁶ Therefore, the Proposed Project would have a *less than significant* impact.

Mitigation Measures: None

- b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Impact: Less than Significant Impact

The Proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. According to a desktop search of the California Waterboard's GeoTracker database³⁷ no active and open cleanup sites are located within 1 mile of the Project site, nor is the Project site a listed site.

It is noted that since the residence on site was built in 1964³⁸ the presence of Asbestos Containing Materials (ACM) and Lead-Based Paint (LBP) may be disturbed during demolition of the residence. Federal regulations did not prohibit the use of ACMs and LBPs until 1978, and thus, structures built during and prior to that era are likely to contain these materials.

Management of hazardous wastes and materials associated with standard residential demolition and construction would be in compliance with local and State regulations. All debris from demolition would be exported and disposed of off-site.

Therefore, the Proposed Project would have a *less than significant* impact in creating a significant hazard to the public or environment.

Mitigation Measures: None

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

Impact: No Impact

There are no schools within one-quarter mile of the Project site. Therefore, there would be *no impact*.

³⁶ Department of Toxic Substances Control. 2023. Official California Code of Regulations, Title 22, Division 4.5. [Official California Code of Regulations, Title 22, Division 4.5 | Department of Toxic Substances Control](#). Accessed January 11, 2023.

³⁷ California State Water Resources Control Board. 2023. GeoTracker. <https://geotracker.waterboards.ca.gov/>. Accessed January 11, 2023.

³⁸ Zillow. 2023. 3410 Valley Road, Bonita CA 91902 https://www.zillow.com/homedetails/3410-Valley-Rd-Bonita-CA-91902/17137231_zpid/. Accessed January 1, 2023.

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Mitigation Measures: None

- d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code 65962.5 and as a result, would it create a significant hazard to the public or the environment?*

Impact: No Impact

According to the Department of Toxic Substances Control (DTSC) Envirostor Hazardous Waste and Substances Site List, the Project site is not listed on the Cortese list³⁹ Therefore, there would be *no impact*.

Mitigation Measures: None

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

Impact: No Impact

The Project site is not located within the airport influence area (AIA) for San Diego International Airport, Brown Field Municipal Airport, or Naval Air Station North Island, per the San Diego County Airport Land Use Compatibility Plans⁴⁰ Therefore, the Proposed Project would have *no impact*.

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Proposed Project is a residential infill project on an existing residential lot. The Proposed Project would add a new ingress/egress to the site from Plaza Bonita Center Way and therefore improve access to the site. Therefore, there would be a *less than significant impact* on impairing the implementation of or physically interfering with local emergency response plans or emergency evacuation plans.

Mitigation Measures: None

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

Impact: Less than Significant Impact

Wildland fire is an overarching term describing any non-structure fire that occurs in vegetation and natural fuels. Risk factors throughout the site include pockets of vegetation between developed areas and in the hills within the eastern areas of the Project site. The

³⁹ State of California Department of Toxic Substance Control. 2023. Site Mitigation and Restoration Program. <https://dtsc.ca.gov/dtscs-cortese-list/#:~:text=The%20Hazardous%20Waste%20and%20Substances,of%20hazardous%20materials%20release%20sites>, Accessed January 30, 2023

⁴⁰ San Diego County Regional Airport Authority (ALCUP). 2023. ALCUP Mapping Tool. <https://sdcrac-aluc.maps.arcgis.com/apps/webappviewer/index.html?id=945b3a6b12a34b158d8c9022251542e3>, Accessed January 12, 2023.

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Project site is located within an existing residential area which is within a high wildfire hazard risk.⁴¹

The Proposed Project is subject to review by the Fire Department for consistency with Title 15, Chapter 15.28 California Fire Code prior to issuance of development permits. The project has been determined to meet all Fire Code requirements. Furthermore, the project would be required to comply with Title 9, Chapter 12 of City's municipal code regarding weed abatement of any flammable material/brush.

In addition, the National City Safety Element includes goals and policies concerning fire safety and evacuation, including policies that were intended to reduce risks from structural fire, fire-related emergencies, and maintaining sufficient fire response coverage and resources.⁴²

As the Proposed Project would be consistent with the Fire Code and comply with City code for brush management plan, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, there would be a *less than significant* impact.

Mitigation Measures: None

⁴¹ National City, Safety Element Update, Figure SE-8 Wildfire Risk Map, March 2023: <https://fc.nationalcityca.gov/url/EIRfinal>

⁴² National City, Safety Element Update, March 2023: <https://fc.nationalcityca.gov/url/EIRfinal>

X. Hydrology and Water Quality

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Methodology

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The County of San Diego Stormwater Quality Management Plan (SWQMP) with an attached *TM Drainage Study* has been produced by REC Consultants was used to supplement the Hydrology and Water Section contained herein (Appendix C.6). The purpose of the SWQMP was to identify stormwater runoff handling that complies with the County of San Diego. The TM Drainage study, used to supplement the SWQMP, analyzes existing and developed condition 100-year peak discharge. Existing conditions consist of single point of discharge into the drainage channel. An existing culvert is located beneath Plaza Bonita Way, west of the site.

a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Impact: Less than Significant Impact

The Proposed Project is a residential infill development on an existing a residential lot.

According to the TM Drainage Study, runoff from the site drains to a single point of discharge to the existing drainage channel. Ground disturbance during construction has the potential to expose underlying loose soils that could cause erosion or loss of topsoil during rain or high wind events to drain to this creek. Under MM-BIO-2, the drainage shall be protected from direct and indirect impacts by providing a physical barrier between clearing, grading, and construction.

More than an acre of ground disturbance is anticipated; therefore, the Proposed Project is required to comply with conditions of the State Resources Control Board Construction General Permit. A construction SWPPP shall be prepared and maintained for the duration of the Proposed Project. All applicable construction BMPs and non-storm water discharge BMPs shall be implemented in accordance with City of National City minimum BMP requirements as included in the Municipal Code and Jurisdictional Runoff Management Program (JRMP).⁴³

According to the National City Sewer Management Plan, the Proposed Project is already served by National City sewer and municipal water infrastructure.⁴⁴ The storm drain system for the entire project is designed to route and convey all resulting runoff from developed conditions to existing point of discharge. All runoff will receive water quality treatment in accordance with the site-specific Stormwater Quality Management Plan (SWQMP).

Therefore, the Proposed Project would have a *less than significant* impact on violating water quality standards of waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Mitigation Measures: None

⁴³ National City. 2023. Development and Redevelopment Requirements. <https://www.nationalcityca.gov/government/engineering-public-works/engineering-division/storm-water-program/development-redevelopment-requirements>. Accessed January 13, 2023

⁴⁴ National City. 2023. Sewer & Wastewater. <https://www.nationalcityca.gov/government/engineering-public-works/public-works/sewer-waste-water>. Accessed January 13, 2023

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- b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Impact: *Less than Significant Impact*

As mentioned above, the Proposed Project is already serviced by National City infrastructure. National City receives potable water from the San Diego Water Authority (SWA). A water supply assessment was conducted for the Adopted General Plan which includes multiple areas such as National City, Lincoln Acres, and Paradise Village all of which are under SWA jurisdiction⁴⁵. The water supply assessment concluded that water supplies under the scenarios of normal, single and multi-dry years meet the projected demands of the Adopted General Plan and planned development projects within the SWA service area through 2030. Since the Proposed Project is in conformance with the Adopted General Plan through the pre-zoning assigned, it is accounted for in this WSA and therefore would not impact groundwater supplies.

Therefore, the Proposed Project would have *less than significant impacts* on groundwater supplies.

Mitigation Measures: None

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
- i. *result in a substantial erosion or situation on- or off-site;*
 - ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*
 - iii. *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
 - iv. *Impede or redirect flood flows?*

Impact: *Less than Significant Impact*

As detailed in threshold (a) above, BMPs would be implemented to reduce substantial erosion and therefore would not result in substantial erosion of situation on- or off- site.

With existing conditions, runoff from the site drains to the drainage channel located on Project site. An existing culvert is located beneath Plaza Bonita Way, west of the site. According to the Drainage Study prepared for the Proposed Project, runoff from the Project site would drain to one receiving biofiltration basin, and then discharge to the adjacent drainage channel. Additionally, the Proposed Project would not alter the course of the drainage and therefore, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding, exceed the capacity of existing stormwater drainage systems, or impede flood flows.

⁴⁵ Sweetwater Authority, Draft Water Supply Assessment, City of National City General Plan Update. December 2010. <https://www.nationalcityca.gov/home/showpublisheddocument/4445/636090627169130000>. Accessed January 13, 2023.

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Therefore, the Proposed Project would result in *less than significant* impacts.

Mitigation Measures: None

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

Impact: *Less than Significant Impact*

The Project site is within a high-risk dam inundation area in the event of failure of the Sweetwater Main Dam, however, the National City Safety Element contains policies meant to reduce significance of impacts in the event of flooding. These include:

Policy S-2.2: Ensure that new development adequately provides for on- and off-site mitigation of potential flood hazards and drainage problems.

Policy S-2.8: Promote the use of bioswales, tree wells, green roofs, and other infiltration mechanisms to reduce of the volume of stormwater runoff.

The Proposed Project is consistent with these policies.

In addition, review of the Federal Emergency Management Agency (FEMA) Flood Mapping Service determined that Project site is not within a 100-year flood hazard zone.⁴⁶ National City is not within a Tsunami Hazard Area as identified by the California Department of Conservation.⁴⁷ According to the County of San Diego Guidelines for Determining Significance for Hydrology, no projects within the unincorporated County, where the Proposed Project is currently a part of, are likely to be inundated by tsunami or seiche.⁴⁸ Therefore impacts are *less than significant*.

Mitigation Measures: None

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

Impact: *Less than Significant Impact*

As detailed above in threshold (a) and (b), the Proposed Project would implement BMPs per a SWPPP and SWQMP and would not impact groundwater supplies or recharge. Therefore, impacts are less than significant.

Mitigation Measures: None

⁴⁶ Federal Emergency Management Agency (FEMA). 2023. FEMA Flood map Service Center. <https://msc.fema.gov/portal/home>. Accessed January 12, 2023.

⁴⁷ California Department of Conservation. 2023. San Diego County Tsunami Hazard Areas. <https://www.conservation.ca.gov/cgs/tsunami/maps/san-diego>. Accessed January 12, 2023.

⁴⁸ County of San Diego. 2007. Guidelines for Determining Significance – Hydrology. https://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/Hydrology_Guidelines.pdf. Accessed January 13, 2023.

XI. Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Physically divide an established community?*

Impact: No Impact

The Proposed Project is an infill residential development on an existing residential site and would not introduce infrastructure that would physically divide the community.

Therefore, the Proposed Project would have no impact.

Mitigation Measures: None

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

Impact: Less than Significant Impact

After annexation of the Project site into National City, the parcels would be rezoned to Small Lot Residential (RS-2), in compliance with the National City General Plan land use map for the area.

The Proposed Project would be reviewed for compliance with local design standards and ordinances, as well as General Plan policies related to avoiding or mitigating an environmental effect.

Therefore, the Proposed Project would have a *less than significant* impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation Measures: None

XII. Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Impact: No Impact

The Proposed Project is within Mineral Resource Zone 3 (MRZ-3), which is characterized as being an area where significant mineral deposits cannot be determined from available data (California Department of Conservation, 1982). The closest likely significant mineral deposits, mapped as MRZ-2, to the project area is a small pocket from Willow Drive Bridge to approximately 0.5 miles from Sweetwater Reservoir. The Proposed Project is an infill development on an existing residential site and would not have any impacts on mineral resources.

Therefore, there would be *no impact*.

Mitigation Measures: None

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

Impact: No Impact

No known locally important mineral resource was identified in the National City Adopted General Plan. Therefore, there would be *no impact*.

Mitigation Measures: None

XIII. Noise

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Noise. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Generation of substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?*

Impact: Less than Significant Impact

As a relatively small infill development, the Proposed Project is not anticipated to generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Construction would be in compliance with the requirements of the City Noise Control Ordinance.⁴⁹ In addition, as the Proposed Project is in conformance with adopted land use and zoning, there would not be an increase in ambient noise above and beyond typical noise levels for this type of land use.

Mitigation Measures: None

⁴⁹ City of National City Municipal Code of Ordinances. 2023. Title 12 – Noise Control. https://library.municode.com/ca/national_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT12NOCO https://library.municode.com/ca/national_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT12NOCO#:~:text=The%20ordinance%20codified%20in%20this%20title%20shall%20be,2001%29%2012.02.04%20-%20Declaration%20of%20findings%20and%20policy. Accessed January 12, 2023.

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- b) *Generation of excessive groundborne vibration or groundborne noise levels?*

Impact: Less than Significant Impact

The Proposed Project would be built on an existing developed residential pad, requiring minor earthwork during construction. The Proposed Project would not generate excessive groundborne vibration or groundborne noise levels as construction would be compliance with the City Noise Control Ordinance.⁵⁰ Therefore, the Proposed Project would have a *less than significant* impact.

Mitigation Measures: None

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

Impact: No Impact

The Project site is not located within the airport influence area (AIA) for San Diego International Airport, Brown Field Municipal Airport, or Naval Air Station North Island, per the San Diego County Airport Land Use Compatibility Plans.⁵¹ Therefore, the Proposed Project would have *no impact* on exposing people residing of working in the project area to excessive noise level.

Mitigation Measures: None

⁵¹ San Diego County Regional Airport Authority (ALCUP). 2023. ALCUP Mapping Tool. <https://sdcraa-aluc.maps.arcgis.com/apps/webappviewer/index.html?id=945b3a6b12a34b158d8c9022251542e3>. Accessed January 12, 2023.

XIV. Population and Housing

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Impact: Less than Significant Impact

The proposed project is a small-scale infill project on an existing residential lot and would not induce substantial unplanned population growth in the area directly or indirectly. The Proposed Project proposes 10 single-family residences. Since the Proposed Project would be consistent with local land use and zoning regulations, population generated by the Proposed Project would be within projected regional population estimates and local Housing Element estimates.⁵²

Therefore, the Proposed Project would result in *less than significant* impacts.

Mitigation Measures: None

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

Impact: No Impact

The Proposed Project would increase the density of residential development on an existing residential lot. The existing residence on site is not occupied. Therefore, the Proposed Project would have *no impact* on the displacement of existing people or housing.

Mitigation Measures: None

⁵² National City, Housing Element 2021-2019, Chapter 2. Community Profile, August 2021.
SANDAG, Series 14: 2050 Regional Growth Forecast. <https://www.sandag.org/data-and-research/socioeconomics/estimates-and-forecasts>.
<https://www.sandag.org/data-and-research/socioeconomics/estimates-and-forecasts> Accessed January 12, 2023.

XV. Public Services

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Fire Protection?

Police Protection?

Schools?

Parks?

Other Public Facilities?

Impact: Less Than Significant Impact

Fire Protection

The Project site is within the unincorporated community of Bonita, where fire protection and emergency medical services are provided primarily by the Bonita-Sunnyside Fire Protection District, with support from the Chula Vista Fire Department, San Diego Fire

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and Rescue, and National City Fire Department.⁵³ The Project site is proposed to be annexed into the City of National City. National City's Fire Department provides fire protection and emergency medical services in the City, and the Lower Sweetwater Fire Protection District covers the unincorporated area of Lincoln Acres.⁵⁴

Service to this Project site would continue to be covered by the Bonita-Sunnyside Fire Protection District until such a time as their fire plans are updated to accommodate the change in service boundaries. As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for service planning. Therefore, the Proposed Project would not require the provision of a new or physically altered fire stations to maintain acceptable service and would result in *less than significant* impacts.

Police Protection

The unincorporated community of Bonita is provided police services by the Imperial Beach Substation of the San Diego County Sheriff's Department.⁵⁵ The applicant will propose that Project site be annexed into the City of National City.

Service to this Project site would continue to be covered by San Diego County Sheriff's Department until such a time as their service plans are updated to accommodate the change in service boundaries. As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for service planning. Therefore, the Proposed Project would not require the provision of a new or physically altered Sheriff departments to maintain acceptable service and would result in *less than significant* impacts.

Schools

The unincorporated community of Bonita are served by three public school districts: National School District (NSD)⁵⁶, Chula Vista Elementary School District⁵⁷, and Sweetwater Union High School District (SUHSD).⁵⁸ The site would be annexed into the City of National City. The City of National City is also served by NSD and SUHSD, as well as the Southwestern Community College District and the South County Regional, San Diego County Office of Education.⁵⁹

As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for

⁵³ Bonita-Sunnyside Fire Protection District. 2023. About Us. . Accessed January 12, 2023.

⁵⁴ National City Fire Department. 2023. Welcome to the National City Fire Department. <https://www.nationalcityca.gov/government/fire>. Accessed January 12, 2023.

⁵⁵ San Diego County Sheriff's Department. 2023. Imperial Beach Substation. <https://www.sdsheriff.gov/Home/Components/FacilityDirectory/FacilityDirectory/20/34>. Accessed January 12, 2023.

⁵⁶ National School District. 2023. Schools Directory. <https://www.nsd.us/domain/84>. Accessed January 12, 2023

⁵⁷ Chula Vista Elementary School District. 2023. School Directory. <https://www.cvesd.org/schools/school-directory>. January 12, 2023.

⁵⁸ Sweetwater Union High School District. 2023. About Us. <https://www.sweetwaterschools.org/about-suhsd/>. <https://www.sweetwaterschools.org/about-suhsd/> January 12, 2023.

⁵⁹ City of National City. 2023. School & Colleges. <https://www.nationalcityca.gov/community/schools-colleges>. <https://www.nationalcityca.gov/community/schools-colleges> Accessed January 12, 2023.

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service planning. Therefore, the Proposed Project would not require the provision of a new or physically altered schools to maintain acceptable service and would result in *less than significant* impacts.

Parks

The unincorporated community of Bonita is served by the County of San Diego Department of Parks and Recreation.⁶⁰ The National City Community Services department provides Facilities & Amenities including Parks & Fields, Programs, Senior Services, and Events.⁶¹

As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for service planning. Therefore, the Proposed Project would not require the provision of a new or physically altered parks to maintain acceptable service and would result in *less than significant* impacts.

Other Public Facilities

As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for service planning. Therefore, the Proposed Project would not warrant the expansion or alteration of other public facilities, such as libraries or community centers. Therefore, the Proposed Project would result in *less than significant* impacts.

Mitigation Measures: None

⁶⁰ County of San Diego Parks and Recreation. 2023. Home. <https://www.sdparcs.org/content/sdparcs/en/home.html>.
<https://www.sdparcs.org/content/sdparcs/en/home.html> Accessed January 12, 2023.

⁶¹ City of National City. 2023. Community Services Department. <https://www.nationalcityca.gov/government/community-services>.
<https://www.nationalcityca.gov/government/community-services>. Accessed January 12, 2023.

XVI. Recreation

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Impact: Less than Significant Impact

As the Proposed Project is consistent with adopted zoning and general plan land use, the population induced by the Proposed Project is within projections that have been used for service planning. In addition, the increase in population induced by the Proposed Project is not significant enough to warrant substantial physical deterioration of recreational facilities.

Therefore, the Proposed Project would result in *less than significant* impacts.

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Proposed Project is a residential infill project and does not include recreational facilities. As noted in Section XV Public Services under Parks, the Proposed Project would not require the construction of new or expanded recreational facilities. Therefore, the Proposed Project would have *less than significant* impacts.

Mitigation Measures: None

XVII. Transportation

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The Proposed Project would introduce a private road and ingress/egress to Plaza Bonita Center Way in compliance with local roadway standards, replacing an existing unpaved private driveway. No existing or planned bike trails were identified within the project area or along Plaza Bonita Center way⁶². Therefore, there would be *less than significant* impacts from conflicts with a local program, plan, ordinance, or policy addressing the circulation system.

Impact: Less than Significant Impact

Mitigation Measures: None

b) *Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

According to the Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, “Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects

⁶² National City. 2023. Draft Supplemental Program Environmental Impact Report for the National City Focused General Plan Update. <https://fc.nationalcityca.gov/ui/core/index.html?mode=public&shareto=#expl-tab1:SHARED/!2yAGd7IE9m3FHVvx86BTN/cJdt8Im0dD0Rrz4E>. Accessed May 9, 2023.

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that generate or attract fewer than 110 trips per day (i.e. average daily trips [ADT]) generally may be assumed to cause a less-than significant transportation impact.”

Based on ITE trip generation rates, this project is estimated to generate approximately 100 ADT (the total number of trips estimated for each single family detached units equals to 10 trips per dwelling unit multiplied by 10 units).⁶³ This would be less than the < 110 ADT threshold, and therefore, the Proposed Project would have *less than significant* impacts.

Impact: Less than Significant Impact

Mitigation Measures: None

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

The Proposed Project is an infill residential project on a lot with an existing residential use, and therefore would not introduce incompatible uses. The Proposed Project would replace access from an existing private drive with a paved road with ingress/egress to Plaza Bonita Center Way, where there is currently none. To comply with National City emergency access / egress requirements, the private road would second egress point that is gated with a fire department Knox box. The emergency access gated egress will allow fire department to exit out into Plaza Bonita Center Way without conducting a U-turn. This would not significantly increase hazards due to this new intersection, as across from this Project site is an existing roadway into a separate residential development. The Proposed Project would effectively create an unsignalized, 4-way intersection at this location. Therefore, there would be *less than significant* impacts in substantially increasing hazards due to a geometric design feature.

Impact: Less than Significant Impact

Mitigation Measures: None

d) *Result in inadequate emergency access?*

As noted above in (a) and (c) the new driveway to the Project site would increase accessibility to the site from existing conditions. Therefore, there would be *less than significant impacts* to emergency access.

Impact: Less than Significant Impact

Mitigation Measures: None

⁶³ State of California Governor’s Office of Planning and Research. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed January 20, 2023.

XVIII. Tribal Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*

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

Impact: Less than Significant Impact with Mitigation Incorporated

No reservations exist within the City of National City. Local tribes identified by the NAHC to have traditional and cultural affiliation with the geographic area of National City were contacted for consultation by the City via letter in early January 2023 (see Appendix D). Two responses, one from the Viejas Band of Kumeyaay Indians (“Viejas Band”), was received via email on January 19, 2023, and one from Sycuan Band of the Kumeyaay Nation Cultural Resource Center on April 4, 2023.

The Viejas Band noted that cultural resources of import to the tribe are within or located in proximity to the Project site. The Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

The Sycuan Band of the Kumeyaay Nation Cultural Resource Center identified that the project is not within the boundaries of the recognized Sycuan Indian Reservation however it is within the Kumeyaay Nation’s traditional territory. As detailed in the April 4 letter, additional materials and requests to contact the Kumeyaay Tribes have been conducted by the City of National City and is included in Appendix D.

The Proposed Project would comply with all relevant sections of the Public Resources Code (PRC) as it relates to Tribal Cultural Resources.

Section 5097.5 of the PRC states that “No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.”

Section 5097.9 of the PRC specifies the procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of NAHC.

Section 5097.98 further defines the standards for handling Native American human remains. Section 5097.993 sets requirements for the unlawful and malicious excavation, removal, destruction, injury, or defacing of a Native American historic, cultural, or sacred site, which is listed or may be eligible for listing in the California Register of Historical Resources (CRHR).

In addition, Section 7050.5 requires that construction or excavation halt in the vicinity of discovered human remains until the coroner can determine whether the remains are

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those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

With a monitor present during ground disturbance and with compliance with the regulatory context identified above, impacts to tribal cultural resources would be *less than significant with mitigation incorporated*.

Mitigation Measures:

CUL-1 Archaeological and/or Native American Monitoring

XIX. Utilities and Service Systems

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The existing residence on the Project site is served by several utility services including potable water, sewer, communication, electric and natural gas. The site is connected to a 1-inch service lateral connected to a 12-inch water main on Plaza Bonita Center Way. A sewer mainline located under Plaza Bonita Center Way also services the existing residence.

a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or*

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telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact:

The Proposed Project would connect to existing infrastructure for electrical, natural gas, water, wastewater, storm drain and telecommunication facilities. Since the Proposed Project would increase density on site from one residence to ten, it would require the following easements from service providers to expand utilities to adequately serve the additional residences:

- 10-foot telephone/communication easement to Pacific Telephone
- 10-foot SDG&E easement for poles, wires and appurtenances
- 30-foot SDG&E easement for electrical and communication facilities
- 20-foot wide sewer easement

Each of these easements would be located in existing disturbed areas (i.e., roadway and on site) and would not require additional disturbance beyond what is accounted for in the development of the project. Therefore, no additional construction impacts would result from the installation of utilities.

Therefore, the Proposed Project would have *less than significant* impacts.

Mitigation Measures: None

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

Impact:

The Sweetwater Authority responded to the Applicant via letter on July 5, 2022, to the request for annexation of the two parcels including the subject property. Parcel 591-100-31 is already serviced by Sweetwater Authority and parcel 591-100-27 will only require lateral connections for service. As noted above in Section IX. Hydrology and Water Quality, a WSA was completed for the Adopted General Plan area, which includes the area Project site is located within⁶⁴. The WSA concluded that water supplies under the scenarios of normal, single and multi-dry years were adequate to meet the projected demands planned development projects within the SWA service area through 2030. Therefore, the Sweetwater Authority has sufficient water supplies available to serve the Proposed Project and the Proposed Project would have *less than significant* impacts on insufficient water supplies.

Mitigation Measures: None

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

⁶⁴ Sweetwater Authority. 2010. Draft Water Supply Assessment City of National City General Plan Update. <https://www.nationalcityca.gov/home/showpublisheddocument/4445/636090627169130000>. Accessed January 13, 2023.

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Impact: Less Than Significant Impact

The Proposed Project would connect the proposed residential development to the National City operated sewer main located under Plaza Bonita Center Way. The Wastewater Master Plan, which used SANDAG population projections through 2027 to assess future wastewater volume demand, noted that the general area has not been identified as a major contributor to wastewater volumes.⁶⁵ Since the Proposed Project is consistent with the Adopted General Plan, and therefore assessed in the Wastewater Master Plan per SANDAG projections, the Proposed Project is not anticipated to exceed National City's wastewater capacities. Therefore, the Proposed Project would have *less than significant* impacts.

Mitigation Measures: None

- d) *Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Impact: Less Than Significant Impact

Construction debris from demolition of the existing residence and excavation would not generate solid waste in excess state and local standards. Under Municipal Code Section 15.80.050 through 15.80.100, All construction would be required to divert waste from construction and demolition or have their deposit forfeited.

Operational residential solid waste generation would not exceed the capacity of local infrastructure as it is a relatively low-density development. General Plan Land Use Element Policy LU-8.1 describes the requirement that new development, including infill projects, provide fair share contributions toward the costs of the public facilities, services, and infrastructure necessary to serve the development, including solid waste. As noted in the 2011 EIR for the Adopted General Plan, local landfills have adequate capacity to serve the community through 2030.

Therefore, the Proposed Project would have *less than significant* impacts on solid waste capacities and the impairment of solid waste reduction goals.

Mitigation Measures: None

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

Impact: Less Than Significant Impact

National City has adopted a Source Reduction and Recycling Element, a Household Hazardous Waste Element, and a Non-Disposal Facility Element in compliance with Assembly Bill 939, the California Integrated Waste Management Act of 1989. As noted above in threshold (d), construction of the Proposed Project would be in compliance with disposal regulations. The Proposed Project would not conflict with state or local regulations on waste reduction and therefore would have *less than significant* impacts.

⁶⁵ National City. 2023. Sewer and Wastewater. <https://www.nationalcityca.gov/government/engineering-public-works/public-works/sewer-waste-water>. Accessed January 12, 2023.

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Mitigation Measures: None

XX. Wildfire

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Impact: Less than Significant Impact

The Proposed Project proposes infill residential development on an existing residential site and would increase accessibility to the site with the construction of a road with access to Plaza Bonita Center Way. It would not interfere or impair existing emergency response or evacuation plans.

Mitigation Measures: None

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

Impact: Less than Significant Impact

As stated in Hazards and Hazardous Materials, the Proposed Project is subject to review by the Fire Department for consistency with Title 15, Chapter 15.28 California Fire Code prior to issuance of development permits. The project has been determined to meet all Fire Code requirements. The Proposed Project proposes infill residential developments on an existing residential site and would not exacerbate wildfire risks. Therefore, there would be a *less than significant* impact.

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Proposed Project proposes the construction of a private street connecting the residential development to Plaza Bonita Center Way. However, the installation and maintenance of this roadway and ingress/egress would not exacerbate fire risks or result in temporary or ongoing impacts to the environment as this is located within an existing urbanized community.

Mitigation Measures: None

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

Impact: Less than Significant Impact

The Proposed Project proposes infill residential developments on an existing residential site and would not substantially change runoff or drainage on site in a way that would increase these risks. Surface runoff would discharge to the existing discharge points and would therefore not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

Therefore, there would be a *less than significant* impact.

Mitigation Measures: None

XXI. Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Impact: Less than Significant Impact with Mitigation Incorporated

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The Proposed Project would not have the potential to substantially degrade the quality of the environment or substantially impact biological or cultural resources with implementation of the mitigation measures identified below. The Proposed Project would implement mitigation measures to protect species through pre-construction surveys and through protection of the drainage, which supports riparian and non-wetland habitat. In addition, the presence of a monitor during ground disturbance will reduce potential impacts to unanticipated discovery of archaeological resources.

Mitigation Measures:

MM BIO-1: Pre-construction Avian Survey

MM BIO-2: Construction Fencing

MM BIO-3: Permanent Open Space Easement

CUL-1 Archaeological and/or Native American Monitoring

CUL-2 Unanticipated Discovery of Archaeological Resources

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

Impact: Less than Significant Impact

CEQA Guidelines Section 15065(a) states that a Lead Agency shall consider whether the cumulative impact of a project is significant and whether the effects of the project are cumulatively considerable. The assessment of the significance of the cumulative effects of a project must, therefore, be conducted in connection with the effects of past projects, other current projects, and probable future projects.

As described in the impact analyses in the sections above, a majority of potential impacts to resources are less than significant and would not require mitigation measures to reduce impacts. To biological and cultural resources, impacts would be less than significant with mitigation incorporated. Due to the nature of the Proposed Project and consistency with environmental policies, incremental contributions to impacts are considered less than cumulatively considerable. The Proposed Project would not contribute substantially to adverse cumulative conditions, or create any substantial indirect impacts (i.e., increase in population could lead to an increased need for housing, increase in traffic, air pollutants, etc.).

All other pending, approved, and completed projects in the vicinity of the Proposed Project would be subject to review in separate environmental documents and required to conform to the National City Municipal Code, mitigate for project-specific impacts, and provide appropriate engineering to ensure the development meets all applicable federal, State, and local regulations and codes. As currently designed, and by complying with applicable codes and regulations, the Proposed Project would not contribute to a cumulative impact. Thus, the cumulative impacts of pending, approved, and completed projects would be less than cumulatively considerable and therefore *less than significant*.

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Mitigation Measures: None

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

Impact: Less than Significant Impact

The analyses of environmental issues contained in this IS/MND indicate that the Proposed Project is not expected to have probable or substantial impacts on human beings, either directly or indirectly, and would therefore have a *less than significant* impact.

Mitigation Measures: None

4.0 LIST OF PREPARERS

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5.0 APPENDICES

APPENDIX A - MITIGATION MONITORING AND REPORTING PROGRAM

Measure No.	Description	Responsibility	Timing	Date	Initial
BIO-1	<p>Pre-construction Avian Survey. If construction occurs within the avian breeding season of February 1 through August 31, a qualified Biologist shall conduct a pre-construction avian nesting survey no more than 3 days prior to the start of construction or grubbing. The pre-construction avian survey shall be conducted with a 300-foot buffer of all areas of disturbance. If the survey finds that there is no nesting activity within the area of potential disturbance, clearing and grading activities shall be allowed to proceed. If the survey finds an active nest, then clearing and grading shall not occur within 300 feet of the active nest until nesting activity has been determined complete by the qualified biologist.</p>	Planning Department	Prior to construction		
BIO-2	<p>Construction Fencing. The drainage shall be protected from direct and indirect impacts by providing a</p>	Planning Department	Prior to construction		

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Measure No.	Description	Responsibility	Timing	Date	Initial
	<p>physical barrier between clearing, grading, and construction.</p> <p>A temporary silt fence shall be installed along the southern edge of Proposed Project impacts prior to clearing and grading.</p>				
BIO-3	<p>Permanent Open Space Easement</p> <p>A permanent open easement shall be recorded over the on-site drainage channel (Open Space Lot C on the Tentative Map) and shall include the following provisions.</p> <p>The open easement area shall be permanently fenced with a three-foot split-rail fence to discourage entry into the drainage.</p> <p>Maintenance of the area, including brush management for wildfires and removal of trash and debris, would be the responsibility of the homeowners' association (HOA) and shall be reflected in the Covenants, Conditions and Restrictions (CC&Rs) for the property.</p>	<p>Planning Department</p>	<p>Prior to construction</p>		

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Measure No.	Description	Responsibility	Timing	Date	Initial
	<p>No vegetative removal within the drainage shall occur during the breeding season without prior consultation of a biologist.</p> <p>The area shall be kept free of trash and debris at all times.</p>				
CUL-1	<p>Archaeological and/or Native American Monitoring. A qualified archaeological and/or Native American monitor shall be present during construction activities that involve subsurface grading and/or excavation involving the disturbance of native soils more than 3 feet in depth. The monitor(s) would ensure that unanticipated finds are not damaged or destroyed.</p>	Planning Department	Prior to construction		
CUL-2	<p>Unanticipated Discovery of Archaeological Resources. In the event of an unanticipated discovery of archaeological resources during construction, construction should stop on the site until a qualified archaeologist can survey the resource and determine potential impacts and</p>	Planning Department	During Construction		

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Measure No.	Description	Responsibility	Timing	Date	Initial
	necessary preservation measures. Any archaeological resources that are found would be identified, adequately documented in the field, and/or preserved, as recommended by a qualified archaeologist.				

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APPENDIX B -- APPLICATION MATERIALS

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APPENDIX C – TECHNICAL STUDIES

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APPENDIX C.1 --AIR MODELING: CALEEMOD RESULTS

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**APPENDIX C.2 –BIOLOGICAL RESOURCE LETTER REPORT FOR THE
VALLEY VIEW PROJECT**

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APPENDIX C.3 – WATER RESOURCES DELINEATION REPORT

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**APPENDIX C.4 – CULTURAL RESOURCES SURVEY FOR THE VALLEY
VIEW DEVELOPMENT PROJECT**

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**APPENDIX C.5 – GEOTECHNICAL INVESTIGATION PROPOSED
RESIDENTIAL SUBDIVISION SITE**

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**APPENDIX C.6 – STORMWATER QUALITY MANAGEMENT PLAN WITH
DRAINAGE STUDY**

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APPENDIX D – AB52 CONSULTATION LETTER AND RESPONSES