THE CITY OF SAN DIEGO

ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

Project No. 646353
Addendum to EIR
(SCH No. 1984030708 and SCH No. 2019060003)

SUBJECT: **Addendum to Environmental Impact Report**: *SeaWorld 2020 Master Plan Update Project;* APPLICANT: SeaWorld LLC d/b/a SeaWorld San Diego.

I. SUMMARY OF PROPOSED PROJECT

The project consists of the 2020 Sea World Master Plan Update (2020 Master Plan), which sets forth the long-range conceptual development program, development parameters, and project review procedures for the future renovation of the entire leasehold area for SeaWorld Adventure Park (SeaWorld) for the next 20 to 25 years. The project is a comprehensive update and revision to the previous 2002 Sea World Master Plan Update, which has largely been implemented. The 2002 Master Plan was the subject of a Final Environmental Impact Report dated June 5, 2001, LDR No. 99-0618, SCH No. 1984030708.

The project contains land use and development criteria for the entire leasehold and retains five planning areas that were established in the 2002 SeaWorld Master Plan. Planning area boundaries are shown in Figure 2-1, Planning Area Boundaries, of the 2020 SeaWorld Master Plan. The project serves as the "Development Plan" described in the lease between SeaWorld and the City. The project is also part of the City's Local Coastal Program for Mission Bay Park.

The project would require the approval of a Community Plan Amendment, a Local Coastal Program amendment, and the 2020 Master Plan as the Development Plan referenced in the SeaWorld lease with the City.

An important goal of the 2020 Master Plan is to transition from a "site-specific" development paradigm to an "area-specific" development paradigm that more closely matches SeaWorld's future renovation needs. In meeting this goal, the objectives are (1) to maintain the same level of environmental and coastal resource protection provided under the 2002 Master Plan, (2) to ensure that the concerns identified in the community outreach process continue to be addressed, and (3) to address any new environmental concerns.

A general description of the five planning areas is provided as follows:

Area 1: SeaWorld Theme Park

The SeaWorld Theme Park area consists of approximately 97.2 acres of land area, which is slightly larger (by approximately 8.6 acres) than the SeaWorld Theme Park area defined in the 2002 Master Plan because this area has been expanded to the south and west. The area is bounded by the South Pacific Passage channel of Mission Bay to the north, the Administration and Support area to the west, the South Shores area of Mission Bay Park to the east, and the Guest Parking area to the south. An additional 7 acres of open water area are used for shows at Waterfront Stadium.

The SeaWorld Theme Park area is developed with a variety of marine-related attractions and support facilities. SeaWorld Tower, at 320 feet tall, is a prominent landmark and focal point for all of Mission Bay Park and beyond. Within the SeaWorld Theme Park, existing facilities reflect the marine animal, education, and conservation themes set forth in SeaWorld's vision statement.

Area 1 provides opportunities for development, redevelopment, renovation, and expansion. Application submittals for individual development projects will be made as needed, pursuant to the 2020 Master Plan. A variety of attractions will be considered for development. Consistent with this Master Plan, no single attraction type will predominate. Future development and redevelopment consistent with the land use and development criteria of the 2020 Master Plan will be allowed throughout Area 1.

The Development Criteria are defined in section B, Land Use and Development Criteria, of the 2020 Master Plan and include a maximum height of 160 feet, provided not more than four attractions, except those preceding the 2002 Master Plan, exceed 100 feet in height, as well as a minimum 50-foot wide shoreline setback required of all future development except for water- or shoreline-dependent uses such as marina facilities, water intake and discharge facilities, or park attractions oriented toward open water use (the Waterfront Stadium or Skyride being examples). The shoreline setback shall begin at the top edge of the existing rip-rap revetment or the bluff edge, whichever elevation is greater. Additionally, all new development shall be set back behind a bulk plane line beginning at the perimeter landscaped area (20 feet from the perimeter on the eastern and southern leasehold perimeter boundaries) at a height of 30 feet, and inclined at a one-to-one angle (45°) until the 160-foot height limit is reached. The perimeter bulk plane setback and buildable area shall be as depicted in Figure 2-3 of the 2020 Master Plan (Section BB detail).

Design Criteria for Area 1 is as follows:

1. The bulk of the building shall be 30 feet in height with allowance for roof articulation to a height of 40 feet to avoid a flat roof effect. (note: this design criteria is carried over from the 2002 master plan)
2. One icon structure shall be permitted to a maximum height of 60 feet above ground level with a maximum footprint of 400 square feet. (note: this design criteria is carried over from the 2002 master plan)
3. Prior to completion of the project, SeaWorld will construct a 10-foot-wide landscaped pathway along the waterfront beginning at the northeast corner of the leasehold and extending westward for a distance of 500 feet. When not required for a special event, this

pathway would be open to the public. (note: this design criteria is carried over from the 2002 master plan)

4. The least amount and intensity of external lighting shall be used on the exterior of the structure and waterfront pathway to meet safety and security needs. Emphasis shall be placed on ground level lighting using motion-activated lights that do not exceed 3000 Kelvin and are shielded and aimed downward. (note: this is an additional design criteria beyond the 2002 master plan).

Area 2: Guest Parking

The Guest Parking area is approximately 56 acres along the south side of the leasehold area between the SeaWorld Theme Park and Sea World Drive. This area is slightly smaller (by approximately 6.6 acres) than the Guest Parking area defined in the 2002 Master Plan because of the expansion of Area 1 as previously described. There are approximately 6,134 paved parking spaces currently available within the area; the number varies depending on how the parking lot is striped and managed. The main vehicular entryway to the SeaWorld site is located in the southwest corner of the Guest Parking area. The main exit is located near the middle of the area at a signalized intersection with Sea World Drive. Bus, taxi, and ridesharing services are also available within the area.

As provided in the 2002 Master Plan and previously analyzed in the certified 2001 EIR (LDR No. 99-0618), the 2020 Master Plan retains the potential future four-level parking garage within the existing parking lot. The parking garage will not be needed until SeaWorld attendance justifies the need for this additional parking. Half of the first level will be below grade.

Design criteria for Area 2 is as follows pertaining to the potential development of the parking garage, if needed in the future. (Note: all of these design criteria are carried forward from the 2002 master plan):

1. The maximum height of the structure shall not exceed 45 feet above the finished grade.
2. The edges of buildings shall be softened with landscaping features such as screen trees, a roof top trellis, or hanging vines.

Area 3: Administration and Support

The Administration and Support area consists of approximately 6.8 acres of land located immediately to the west of the SeaWorld Theme Park (Area 1) between the SeaWorld Marina and the Guest Parking area. This area is slightly smaller (by approximately 1.7 acres) than the Administrative Support area defined in the 2002 Master Plan because of the expansion of Area 1 as previously described This area contains many of the support facilities needed for the operation of SeaWorld. These include administrative offices, security, water treatment, storage, and other facilities. A reserved parking lot is also located in the south portion of the area.

Future allowed uses in Area 3 may include offices, water treatment, storage, maintenance, parking, and similar types of theme park support facilities.

There are no design criteria specific to Area 3.

Area 4: SeaWorld Marina

The SeaWorld Marina contains a small shoreline land area of approximately 1 acre and an open water area of 10 acres. The water area contains a 200-slip marina operated by SeaWorld. Restroom, shower, and lounge facilities are provided for marina guests. On the east side of the marina is the water intake platform, one of two intake areas that provide sea water for SeaWorld's marine animals. The filter plant for the intake is located just to the south in Area 3.

As provided in the 2002 Master Plan and previously analyzed in the certified 2001 EIR (LDR No. 99-0618), the 2020 Master Plan retains the future expansion of the existing marina, although there are no plans to construct this expansion at this time.

Design criteria for Area 4 is as follows pertaining to the potential development of the parking garage, if needed in the future:

1. A minimum 10-foot-wide landscaped public shoreline walkway (lateral shoreline access) along the waterfront shall be incorporated into the marina expansion design. (note: this design criteria is carried over from the 2002 master plan)
2. Adequate parking and access for the marina shall be provided as a condition of marina expansion plans. (note: this design criteria is carried over from the 2002 master plan)
3. Any future expansion shall be designed to avoid impacts to the marine habitat, namely eel grass, to the maximum extent feasible. (note: this is an additional design criteria beyond the 2002 master plan).

Area 5: Perez Cove Shoreline

The Perez Cove Shoreline area consists of approximately 11.4 acres of land between the Perez Cove shoreline on the east and Perez Cove Way on the west. The northern portion of the area contains the Hubbs-SeaWorld Research Institute and parking lot. Additional asphalt parking areas and landscaping cover the remaining area. The parking area serves marina guests and is an auxiliary lot for SeaWorld employees.

As provided in the 2002 Master Plan and previously analyzed in the certified 2001 EIR (LDR No. 99-0618), the 2020 Master Plan retains the future potential site of a 300-room hotel, although there are no plans to construct a hotel at this time.

Design criteria for Area 5 is as follows pertaining to the potential development of the parking garage, if needed in the future:

1. The height of the hotel shall not exceed 30 feet above the finished grade. (note: this design criteria is carried over from the 2002 master plan)
2. A minimum 10-foot-wide public accessway (vertical access) from Perez Cove Way to the shoreline shall be provided somewhere between the existing Skyride station and the driveway/aisle at the southern end of the north employee parking lot (a distance of approximately 550 feet), with the final location to be determined when final plans are submitted for review. The accessway shall be located and designed to facilitate connection with the existing bikeway and pedestrian path

along Perez Cove Way. (note: this design criteria is carried over from the 2002 master plan)

3. A minimum 10-foot-wide landscaped public shoreline walkway (lateral shoreline access) along the waterfront shall be incorporated into the hotel design. (note: this design criteria is carried over from the 2002 master plan)
4. Adequate parking and access for the marina shall be provided as a condition of the hotel expansion plans. (note: this design criteria is carried over from the 2002 master plan)
5. A signage program for the hotel and public accessways shall be drafted in order to inform the public of their right of access to and along the water. (note: this is an additional design criteria beyond the 2002 master plan).
6. A minimum 50-foot public use zone (as defined in the MBPMP Chapter 2, Site Design, Section 9 Public Use Zones) width at bulkhead/rip-rap conditions. (note: this is an additional design criteria beyond the 2002 master plan).
7. A minimum 25-foot building setback (including parking structure), in addition to the public use zone. (note: this is an additional design criteria beyond the 2002 master plan).
8. A 17-foot minimum combined pedestrian and bicycle path within public use zone from the public right-of-way on Perez Cove Way at the southeast corner of the potential hotel—northward to and along the waterfront—connecting to the Perez Cove right-of-way at the existing Hubbs Research Building. (note: this is an additional design criteria beyond the 2002 master plan).

Access

Under existing conditions, access to the project area is provided via three roadways that branch off SeaWorld Drive. W. Mission Bay Drive is on the west side of the project area, SeaWorld Drive provides access to the main entrance to the theme park via Oceangate Way and Perez Cove Way which both run along the western boundary of the project area. W. Mission Bay Drive currently provides access to the guest parking areas via Perez Cove Way to S. Shores Road. SeaWorld Drive provides access to all project areas, and Perez Cove Way provides more direct access to Area 5. The access would remain the same in the 2020 Master Plan.

Discretionary Actions The project would require the approval of the following discretionary actions:

- Approval of a 2020 Master Plan as an amendment to the MBPMP as both the community plan and LCP
- Approval of the 2020 Master Plan as the Development Plan referenced in the SeaWorld lease
- Certification of Addendum to the previous EIR in accordance with CEQA
- Approval of Coastal Development Permits for implementation of any individual projects set forth in and consistent with the new Master Plan
- Approval of a site development permit at the time SeaWorld proceeds with the future marina expansion.

In addition, depending on the nature of the proposed development, the following permits may be required:

- General Construction Activity Stormwater Permit (Regional Water Quality Control Board)
- Section 404 Permit (U.S. Army Corps of Engineers)
- Section 10 of the Rivers and Harbors Act (U.S. Army Corps of Engineers)
- Section 1603 Streambed Alteration Agreement (California Department of Fish and Wildlife)
- Encroachment permit for Caltrans to implement transportation impacts DS-5 and DS-6

II. ENVIRONMENTAL SETTING

The proposed SeaWorld 2020 Master Plan Update (2020 Master Plan or project) is located in Mission Bay Park, within the city limits of the City of San Diego (City). The project site is approximately 8 miles northwest of the downtown/civic center area (see Figure 1-1, Regional Map). The boundaries of Mission Bay Park are Interstate 5 on the east, the Pacific Ocean on the west, Interstate 8 and the San Diego River Floodway on the south, and Grand Avenue on the north (Figure 1-2, Project Location). The SeaWorld San Diego (SeaWorld) leasehold comprises approximately 172 acres of land and 17 acres of water in Mission Bay Park, which is owned by the City.

III. SUMMARY OF ORIGINAL PROJECT

The SeaWorld Master Plan Update sets forth the long-range conceptual development program, development parameters, and project review procedure to the future renovation of the SeaWorld Adventure Park. The goal of this plan is to ensure that the potential environmental impacts of future planning decisions are taken into account and that the basic parameters to achieve this goal are clarified. In June 1999, SeaWorld Inc. submitted an application to the City of San Diego for the SeaWorld Master Plan Update, and associated amendments to the Mission Bay Park Master Plan Update/Local Coastal Program Land Use Plan, and the City of San Diego Progress Guide and General Plan. A public hearing was conducted in July 2001 and the Council of the City of San Diego certified that the 2001 SeaWorld Master Plan Update Environmental Impact Report (2001 EIR) was complete and in compliance with the California Environmental Quality Act of 1970 (California Public Resources Code section 21000 et seq.) and the State guidelines thereto (California Code of Regulations section 15000 et seq.).

The SeaWorld Master Plan Update project objectives are guided by the SeaWorld vision statement which is "To be recognized globally for achieving new levels of distinction and respect by leading the industry with live marine animal experience, innovative entertainment, education, research and conservation that ensures our growth and success."

The plan's major objectives are 1) to establish an updated baseline of existing uses and leasehold entitlements 2) to identify site-specific development proposals 3) to define development criteria for future conceptual development areas and 4) to address the concerns identified in the community outreach process.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the 2002 Master Plan Final Environmental Impact Report dated June 5, 2001, LDR No. 99-0618, SCH No. 1984030708. The certified 2001 EIR evaluated development of the entire SeaWorld Master Plan area. This document tiers from the previously certified 2001 EIR. In addition, for traffic/transportation analysis, this document also tiers from the previously certified Final Program Environmental Impact Report for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003), as permitted by Sections 15152 and 15168 of the California Environmental Quality Act (CEQA) Guidelines. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

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

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

effects; or

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

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

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

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

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

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

V. IMPACT ANALYSIS

The following includes the project-specific environmental review pursuant to the CEQA and tiers from the certified 2002 Master Plan Final Environmental Impact EIR (SCH No. 1984030708), and the certified Final Program Environmental Impact Report for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). More specifically, this analysis evaluates the adequacy of the analysis provided in the certified 2002 Master Plan Final Environmental Impact EIR (SCH No. 1984030708), as well as the certified Final Program Environmental Impact Report for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003) specifically for transportation/traffic issues, relative to the project.

Air Quality
2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update Final EIR (2001 EIR) did not identify any potential significant air quality impacts. The project did discuss that air quality would almost exclusively be impacted through vehicular traffic generated by increased site visitor traffic. Retirement of older cars from the vehicle fleet will offset increased visitor attendance travel emission such that SeaWorld buildout travel emission will be less than from existing site visitor traffic for all pollutants except PM-10. Secondary project-related atmospheric impacts derived from a number of other small, growth-connected emissions sources such as temporary emissions of dusts and fumes during project construction, were small in comparison to the project-related automotive sources so that their impact is negligible. Emissions from construction activities were determined to be below the significant level thresholds. As explained in the 2001 EIR, stationary source emissions were determined to not substantially increase, because any new sources of emissions would be required to be offset by a 120 percent reduction of equivalent emission elsewhere in the air basin. On water activity emissions, such as marina expansion, were determined to not exceed the City of San Diego threshold. Therefore, the 2001 SeaWorld EIR did not identify any significant air quality impacts. Regardless, the EIR provided Mitigation Measure 4.9-1, which includes recommendation for construction management procedure, transportation demand management procedures, and site access/egress capacity criteria (see full description of Mitigation Measure 4.9-1 in Section VI, Mitigation Monitoring, and Reporting Program of this addendum.

Project

Air quality impacts for the 2020 SeaWorld Master Plan Update were evaluated in Dudek's Air Quality and Greenhouse Gas Emissions Technical Memorandum for the 2020 SeaWorld Master Plan Update in November 2021. Proposed construction activities that would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips) associated with criterial air pollutants emissions would be less than significant (Dudek 2021a). Although no potentially significant air quality impacts were identified, the 2001 EIR included Mitigation Measure 4.9-1 to reduce adverse but less than significant emissions of criteria air pollutants during construction and shall be applied to the proposed project.

Operation of the Project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from employee and visitor vehicles, marine vessels, and stationary sources (boilers, generators, spray booths, gasoline dispensing, etc.). The Project would result in a net reduction in daily trips associated with employees and visitors. The Project also has retired eight SDAPCD permitted emissions sources described in the 2001 EIR, including the four cogeneration units, three saltwater ozone treatment units, and marine coating station which would result in a net reduction in emissions associated with the stationary sources. The natural gas fired boiler has since been replaced with a low-NO_x version as well as the gasoline service 10,000-gallon tank being replaced with an 8,000-gallon tank due to a decrease in throughput. Similarly, the marine vessel activity would not increase beyond that evaluated in the 2001 EIR. Finally, the emissions from mobile sources and marine vessels would decrease compared to what was evaluated in the 2001 EIR due to fleet turnover and increases in mobile source and marine vessel efficiency. The 2001 EIR concluded that the Project would result in less than significant air pollutant emissions during operation. Because the Project

would result in fewer air quality emissions than were evaluated in the 2001EIR, the Project would also result in a less than significant impact during operation (Dudek 2021a).

Overall, the proposed project would not have growth inducing effects, would not exceed the San Diego County Air Pollution Control District's mass daily and annual significant thresholds during construction or operation, would not increase emission of air quality pollutants or TACs that would exceed that evaluated within the 2001 EIR, and would result in a less than significant impact of other emissions such as odor. Air quality impacts would be less than significant, and no mitigation would be required, and no new impacts beyond those identified in the 2001 EIR would occur. Mitigation Measure 4.9-1 is still applicable from the 2001 EIR and a full description can be found in Section VI Mitigation, Monitoring, and Reporting Program, of this addendum.

Biological Resources
2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update EIR (2001 EIR) identified the project site to consist of previously filled wetlands with no sensitive or threatened and endangered plant species. The project site has several marine biological resources that are typically found in the water area of the SeaWorld leasehold. Some of those marine resources include bryozoans, sponges, crabs, shrimps, garibaldi, senorita, and kelp bass. The 2001 EIR identified potential significant impacts to the California least tern (*Sterna antillarun browni)* and marine resources of eel grass (*Zostera marina*). The California least tern nesting sites are located in Mission Bay: Mariner's Point, FAA Island, and North Fiesta Island. Two other Mission Bay sites have been used in past years as nesting tern, located at Stony Point (north of SeaWorld, across from Perez Cove and the Flood Control Channel (along the San Diego River channel directly opposite to the Sea World main entrance). Eelgrass surveys of Perez Cover were performed in August 2000 for the 2001 Sea World Master Plan. Additional results from prior eelgrass surveys of all of Mission Bay from the 1997 and 1992 Mission Bay and long-term eelgrass monitoring studies from 1998 and 1999 for the Intensity Games show in Waterfront Stadium on the Sea World leasehold were provided for the evaluation of the 2001 Sea World Master Plan impacts to marine resources.

According to the Mission Bay Park Master Plan Update (adopted August 1994, amended in August 1995, May 1997, and July 2002), no significant impacts were identified to the least tern productivity rates in the Mission Bay area as a result of existing or expanded Sea World fireworks displays. Additionally, no impacts were identified on the foraging behavior within or near the Sea World leasehold. The 2001 EIR determined that a significant impact could occur to the nearby and currently uncolonized Stony Point Least Tern Preserve. Mitigation Measure 4.6-3 was established to reduce significant impacts to California least tern to less than significant levels.

The results of the eelgrass survey determined that a significant impact was identified in areas where expansion and development could create shading impacts adjacent to the shoreline eelgrass habitat. Additionally, a significant impact was determined as the result of uncontrolled sediments entering and interfering with eelgrass habitats. Mitigation Measure

4.6-1 and 4.6-2 were established to reduce significant impact to marine resources to less than significant levels.

With the implementations of Mitigation Measure 4.6-1 through Mitigation Measure 4.6-3, the impacts to biological resources were determined to be less than significant.

Project

A field survey was conducted, and a biological memorandum was prepared by Dudek in November 2021. The memorandum identified three land covers within the project site, including developed land (168.71 acres), disturbed land (5.71 acres), and open water (11.98). In accordance with the City's Biology Guidelines (City of San Diego 2018), any impacts to disturbed or developed land (Tier IV) would not be considered significant. Impacts to open water were previously analyzed and identified in the 2001 SeaWorld EIR, and mitigation would consist of permits from the appropriate resource agency prior to construction of any in-water projects as stated in Section 4.6.5 of the 2001 SeaWorld EIR (City of San Diego 2001b).

A search of USFWS and California Natural Diversity Database records showed that Nuttal's acmispon (*Acmispon prostratus*), and Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*) have known occurrences within the project vicinity, but these are outside the project footprint and these species were not identified during the field reconnaissance survey (CDFW 2018; USFWS 2018). No other sensitive plant species were directly observed within the study area or would have a moderate to high potential to occur, therefore no significant impacts to sensitive plants would be expected in the study area.

A search of USFWS and California Natural Diversity Database records, showed that California least tern and California black rail (*Laterallus jamaicensis coturniculus*) have been recorded within the vicinity of the project (CDFW 2018; USFWS 2018). California least tern breeding has also been documented at the City-designated Stony Point California least tern nesting site, which is approximately 800 feet north of the project location, by CDFW (CDFW 2006, 2009, 2015). The results of these nesting surveys at Stony Point indicated that, while 136 nests were identified in 2006, there were no breeding pairs in 2009, and only one successful pair in 2015(chicks were depredated). Based on analysis conducted under the Mission Bay Park Natural Resource Management Plan (MBNRMP) (City of San Diego 1990) and the Biological Resources Report of the SeaWorld Master Plan Update, this reduction in breeding pairs would not have occurred due to the presence of the SeaWorld leasehold (Dudek 2020a).

Other special-status species with a moderate potential to occur on the site include Cooper's hawk (*Accipiter cooperii*) and American peregrine falcon (*Falcoperegrinus anatum).* Given the developed nature of the study area and since the study area is more than 500 feet from the Stony Point City-designated California least tern nesting site (Dudek 2021b - Figure 2, Attachment A), any potentially significant direct impacts to the sensitive species would be avoided through compliance with the MBTA, California Fish and Game Code Sections 3503 and 3503.5, the City's Biology Guidelines (City of San Diego 2018), the MBNRMP (City of San Diego 1990), the Mission Bay Park Master Plan Update (MBMPU) (City of San Diego 2002), the 2020 Master Plan, as well as through implementation of the City's current regulations

including the Outdoor Lighting Regulations per San Diego Land Development Code (LDC) Section 142.0740 and Mitigation Measure 4.6-3 in the 2001 SeaWorld EIR (Dudek 2021b).

Based on the analysis of the provided by Dudek's Biological Memo for 2020 SeaWorld Master Plan Update, the proposed project would not result in any potentially significant impacts beyond those already identified in the 2001 SeaWorld Master Plan Update. Mitigation measures 4.6-1 to 4.6.3 are still applicable from the 2001 EIR and a full description can be found in Section VI Mitigation, Monitoring, and Reporting Program, of this addendum.

Cultural Resources

2001 SeaWorld Master Plan Update EIR

As was stated in the 2001 SeaWorld Master Plan Update EIR, historically, Mission Bay Park was a little used, unnavigable backwater made up of tidal basins, sand dunes, salt marshes, swamps and salt flats, as well as upload through extensive dredging and filling operations. Mission Bay was converted from an open coastal estuary with extensive salt marsh and mud flats, to a small boat harbor and public recreational resource. The project site is fully developed, and no record of cultural resources were discovered or identified as being associated with the project site. With the development of the project site, which included extensive dredge and fill operations, any cultural resources within the project site would have been covered or removed. Therefore, the FEIR does not identify any significant direct or cumulative cultural resources impacts, and no mitigation measures were recommended.

Project

A Cultural Resource Inventory was conducted by Dudek in February 2020 to determine if the implementation of the proposed project has the potential to impact archaeological resources and/or tribal cultural resources beyond those already identified in the 2001 SeaWorld EIR. A search of records housed at the SCIC identified no resources within the proposed project APE. A search of the Sacred Lands File by the NAHC was positive for tribal resources within 1 mile of the proposed project APE, but no Native American correspondence has indicated the presence of cultural resources within the APE specifically. A review of historical topographic maps and aerial photographs reveal that the proposed project APE was located within wetlands and partially under bay water until the 1940s and 1950s. The land on which the proposed project APE now rests was constructed with the introduction of soils dredged from the bottom of Mission Bay and imported from off site (Dudek 2020b). The proposed project site is fully developed and no record of cultural resources discovered or identified as being associated with the proposed project site were available, it is not likely that intact cultural resource deposits will be identified on or near the surface of the proposed project. Therefore, implementation of the proposed project would result in no impacts to archeological resources and/or tribal cultural resources that would require mitigation measures, as was concluded in the previous 2001 SeaWorld EIR.

The Cultural Resource Inventory (Dudek 2020) was developed in accordance with the City's Historical Resources Regulations. The intent of the guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation, and development. Compliance with the City's regulations begins with the determination of the need for a site-specific survey for a project. Pursuant to the San Diego Municipal Code (SDMC) Section 143.0212(a), a historic property (built-environment) survey can be required for any parcel containing a structure that is over 45

years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. If records show an archaeological site exists on or immediately adjacent to a subject property, the City will require a survey. In general, archaeological surveys are required when a proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located. The Historical Resources Guidelines establish a development review process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA. These guidelines are designed to implement the City's Historical Resources Regulations contained in the Land Development Code (SDMC Chapter 14, Division 3, Article 2) in compliance with applicable local, state and federal policies and mandates, including, but not limited to, the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966.

Energy

2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update Final EIR (2001 EIR) stated that there would be no impacts relative to energy conservation. However, in an effort to continually develop programs to increase energy efficiency, SeaWorld identified an energy conservation mitigation measure (Mitigation Measure 4.12-1) to apply existing energy conservation programs and consider implementation of project-specific energy conservation programs prior to operation of any new attraction. Such programs help to minimize electrical fuel, and/or natural gas consumption associated with the new attraction. Therefore, implementation of the proposed project would result in no significant impacts, as was concluded in the previous 2001 SeaWorld EIR.

Project

Although the proposed project would result in increases in energy consumption, SeaWorld would continue to develop, exercise, and implement energy conservation programs to minimize energy consumption. SeaWorld would also continue its partnership with San Diego Gas and Electric Energy Conservation Group in developing ways to reduce energy consumption associated with the operation of new attractions. Consequently, the proposed project would not result in the use of excessive amounts of energy. SeaWorld employs state-of-the-art energy conservation programs. Continuance of these programs and implementation of future programs would ensure that no significant impacts associated with energy would result from the proposed project. Similar to the 2001 EIR, because no significant impacts are identified, no mitigation is required. However, in an effort to continually develop programs to increase energy efficiency, SeaWorld would implement the following Mitigation Measure 4.12-1 (see full description of Mitigation Measure 4.12-1 in Section VI, Mitigation Monitoring, and Reporting Program of this addendum).

Geology/Soils
2001 SeaWorld Master Plan Update EIR
A geotechnical study for the proposed project (Christian Wheeler Engineering) was prepared for the project as part of the 2001 EIR. The 2001 EIR determined that the project would result in significant and mitigable impacts to geology/soils.

Liquification
The subject site is located in specific Hazard category Zones 31 and the site is underlain by fill soils and bay deposits that are characterized as relatively loose and cohesionless. Therefore, the impacts associated with liquefaction are considered significant. Implementation of Mitigation Measure 4.8-1 (Section VI Mitigation, Monitoring, and Reporting Program provides a full description) would reduce the geologic impacts to below a level of significance, and was identified in the 2001 EIR and is still applicable to the Master Plan update.

Erosion/Slumping
The proposed project would have potentially significant but mitigable impacts associated with soil erosion during construction and shoreline rip rap slumping. Implementation of the landscape plan would reduce the long-term erosion and sedimentation impacts of the project to below a level of significance. Erosion and sedimentation during construction would be reduced to below a level of significance through implementation of the following mitigation measure. Implementation of Mitigation Measure 4.8-2 (Section VI Mitigation, Monitoring, and Reporting Program provides a full description) would reduce the erosion and sedimentation to below a level of significance, and was identified in the 2001 EIR and is still applicable to the Master Plan update.

Unstable Geologic or Soil Conditions
The 2001 EIR also identified constraints on development of the site as potentially significant but mitigable provided the recommendations of a qualified geotechnical engineer are followed for site preparation, and building and pool foundations. Implementation of Mitigation Measure 4.8-3 and 4.8-4 (Section VI Mitigation, Monitoring, and Reporting Program provides a full description) would reduce the geologic impacts associated with unstable geologic or soil conditions that would constrain development, and was identified in the 2001 EIR and is still applicable to the Master Plan Update.

Project
Similar to the 2001 EIR, implementation of Mitigation Measures 4.8-1 through 4.8-4 (see full description of each mitigation measure in Section VI, Mitigation Monitoring, and Reporting Program of this addendum) would reduce potentially significant impacts associated with unstable geologic or soil conditions that would constrain development to below a level of significance. Additionally, since the 2001 EIR, Tier 1 and Tier 2 projects have been constructed, meaning the site is largely graded and therefore, minimal impacts are associated with the proposed project as part of the Master Plan Update.

Human Health and Safety
2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update EIR analyzed three potential sources of significant impacts to human health and public safety, including (1) hazardous materials, (2) the inactive Mission Bay Landfill, and (3) sediments in Mission Bay.

The use of hazardous materials was analyzed in the 2001 EIR and established protocols for safe storage, labeling, access controls, inventory, and emergency procedure in the event of hazardous materials spills, fire, or other emergency situation. As a result, no significant impacts were identified and no mitigation measures were recommended.

When the 2001 EIR was prepared the Mission Bay Landfill was designated as "inactive" and five project areas were identified as having the potential to be impacted by the closed Mission Bay Landfill: The proposed site of the Splashdown Ride, the site of the educational facility, special events center expansion project site, project site I-2 and the parking garage site. The 2001 EIR determined the impacts to these sites from the closed landfill would be insignificant due to the implementation of monitoring during construction which would ensure that any hazardous materials and/or wastes detected in the soils or groundwater would be remediated during site preparation in conformance with local, state, and federal regulations. No mitigation measures for the Mission Bay Landfill were included.

The 2001 EIR used the results of a 1996 study on the chemistry, toxicity, and benthic community conditions in sediments of the San Diego Bay region to assess the impact of SeaWorld operations on the surrounding sediments. Two sampling stations were located in the Southern Pacific Passage, north of the leasehold. The sampling results showed the sediments at these stations were below the threshold effect level and had a· nontoxic concentration for Rhepoxynius (amphipod). The benthic community at both sites was not considered transitional or degraded, and the sampling stations were not placed on the priority list for future investigation. Construction of the future marina expansion site was identified in the 2001 EIR as having the potential to disrupt Mission Bay sediments. No significant impacts or mitigation measures were assigned to the potential disruption of sediments because the Regional Water Quality Control Board (RWQCB) and other agencies would regulate and monitor sediment conditions through their permitting processes (Brown and Caldwell 2019).

Therefore, no significant impact were identified and no mitigation measures were recommended in the 2001 EIR.

Project

Brown and Caldwell prepared a Human Health and Public Safety Report for SeaWorld on December 12, 2019. The report provided information regarding the applicable health and safety regulations for, and existing condition related to, Mission Bay and SeaWorld, and the potential health and safety impacts from implementing SeaWorld's 2020 Master Plan. As stated in the report, SeaWorld hazardous materials operations do not present a significant impact based on the San Diego County established *Guidelines for Determining Significance Hazardous Materials and Existing Contamination* (San Diego County 2007). Guideline 4.1 from these guidelines specifies that businesses that have and follow a hazardous materials business plan do not exceed the significance guidelines. SeaWorld use of hazardous materials is in compliance with the Hazardous Materials Business Plan and Emergency Contingency

Plan, thus the project would result in no significant impact regarding release of hazardous materials.

The project site is not located in a wildland fire area. With the exception of the closed Mission Bay Landfill, the project site is not located on a hazardous materials site. The closest schools (Correia Middle School and Urban Corps of San Diego County Charter) are approximately 1 mile from the SeaWorld leasehold boundary. SeaWorld is not within the AIA of any airports in San Diego County. The proposed changes in the SeaWorld 2020 Master Plan will not impair or interfere with the San Diego County Operational Area Emergency Operations Plan. SeaWorld's current operations include the use of pesticides and herbicides for landscaping purposes; however, best management practices (BMPs) are in place to minimize the release of these materials, as described in SeaWorld's Stormwater Pollution Prevention Plan (SWPPP).

Assuming continued compliance with regulations, permits, and agreements, the 2020 Master Plan does not present significant impacts to human health and safety, and no mitigation measures are recommended.

Land Use
2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update Final EIR (2001 EIR) states that the City's General Plan and Mission Bay Park Master Plan Update recognize Sea World as an existing theme park and tourist attraction and is compatible with the commercial recreational component of these plans. Impacts relatives to issues topics of transportation/ circulation, biological resources, and neighborhood characteristics/aesthetics are summarized in this section, but analyzed and mitigated in those respective sections of the EIR. Therefore, the EIR states that the reduction of any land use compatibility impacts would be achieved through implementation of activity-specific mitigation measures associated with transportation/ circulation, biological resources, and neighborhood characteristics/aesthetics (see full description of Mitigation Measures 4.2-1, 4.2-2, 4.4-1-11, 4.6-1, 4.6-2, 4.6-3, in Section VI, Mitigation Monitoring, and Reporting Program of this addendum.

Project
The project is a continuation of the existing land use, which as stated in the 2001 EIR is consistent with the City's General Plan and Mission Bay Park Master Plan Update. It should be noted that in 1962 the City Council adopted Ordinance 8628 which stated that Mission Bay Park was "dedicated in perpetuity as a public park" to be developed and maintained for public park purposes. In addition, City Charter section 55 requires that dedicated park land be developed only for park purposes. The California Coastal Commission has certified the Mission Bay Park Master Plan Update and the 2002 SeaWorld Master Plan as the Land Use element of the Local Coastal Program. Ordinance 213 adopted by the City Council in 1933 applied a residential zone to land that later became portions of Mission Bay Park and SeaWorld. However, any residential uses or regulations resulting from that 1933 zone ordinance are superseded by park dedication Ordinance 8628, City Charter section 55 and the Coastal Commission's certification of the Mission Bay Park Master Plan Update and the SeaWorld Master Plan. As a result, only development uses and regulations in the Mission Bay Park Master Plan Update and SeaWorld Master Plan govern development in the Park and SeaWorld leasehold. Thus, the SeaWorld land uses are consistent with the governing plans for the area.

The mitigation measures associated with land use from the 2001 EIR are relative to other issue topics such as transportation/ circulation, biological resources, and neighborhood characteristics/aesthetics. These mitigation measures [Mitigation Measures 4.2-1, 4.2-2, 4.4-1-11, 4.6-1, 4.6-2, 4.6-3, are still applicable from the 2001 EIR and a full description can be found in Section VI Mitigation, Monitoring, and Reporting Program, of this addendum.

Light, Glare and Shading
2001 SeaWorld Master Plan Update EIR

The 2001 SeaWorld Master Plan Update Final EIR (2001 EIR) states that there would be no impacts relative to light, glare and shading. Therefore, no significant impacts were identified, and no mitigation measures were recommended in the 2001 EIR.

Project
The project would not result in any deviation to the design guidelines that would cause any additional light, glare or shading beyond what was analyzed in the 2001 EIR. The design guidelines, as described in Section I, Summary of Proposed Project, are largely carried over from the previous master plan. One additional design guideline has been added for Area I, which would further reduce any potential lighting impacts. This design guideline states that "the least amount and intensity of external lighting shall be used on the exterior of the structure and waterfront pathway to meet safety and security needs. Emphasis shall be placed on ground level lighting using motion-activated lights that do not exceed 3000 Kelvin and are shielded and aimed downward." Therefore, as with the 2001 EIR, no mitigation measures are recommended.

Neighborhood Character/Aesthetics
2001 SeaWorld Master Plan Update EIR
The 2001 EIR identified two significant impacts related to neighborhood character/aesthetics: one related to the Splashdown Ride, and the other related to Tier 1, Tier 2 and Special Projects identified through the Master Plan Update. Mitigation Measures 4.2-1 and 4.2-2 were identified in response (a full description can be found in Section VI Mitigation, Monitoring, and Reporting Program, of this addendum) and require the preparation and implementation of a site plan that is compliant with the landscape buffer and bulk/plane setbacks, along with the Mast Plan Update Design Guidelines for landscaping, lighting, signs, and architectural guidelines. The 2001 EIR identified that these issue areas would create a lessened significant impact, but not below a level of significance.

Project
Since the 2001 EIR, the Splashdown Ride has been constructed and a compliant site plan was prepared and implemented in accordance with mitigation measure 4.2-1. Similarly, projects within Tier 1 and Tier 2 have also been constructed as it relates to mitigation measure 4.2-2; Special projects within the project will still comply with mitigation measure 4.2-2. The project would not result in any deviation to the design guidelines that would cause any neighborhood character/aesthetics impacts beyond what was analyzed in the 2001 EIR.

Noise

2001 SeaWorld Master Plan Update EIR

A noise impacts analysis and technical noise report (Gordon Bricken & Associates 2000) was prepared for the project as part of the 2001 EIR. The noise impacts analysis and 2001 EIR determined that construction noise from any future renovations or development would not result in significant noise impacts upon adherence to the construction noise limits imposed by the City's Noise Ordinance.

The noise impacts analysis found that the proposed "Splash-Down" ride may (theoretically) periodically increase ambient noise by 3 dB(A) and may be audible out to a distance of approximately 7,000 feet from the theme park. However, because the measured average ambient noise levels are relatively high due to traffic and aircraft, there would in fact be no substantial noise increase. Because the ride would not create a significant noise impact, no mitigation was required. The noise impacts analysis also found that future rides and shows may result in significant noise impacts. As identified in mitigation measures 4.7-1 and 4.7-2 (see section VI Mitigation, Monitoring, and Reporting Program for a full description of applicable mitigation measures), a project-specific noise study prepared by a qualified acoustician would be required for any new ride attraction or performance show prior to issuance of a Coastal Development Permit; the noise study must demonstrate that sensitive receptors would not be exposed to noise levels in excess of applicable standards. The noise impacts analysis also determined that the future hotel project would be subject to exterior traffic noise levels that may result in a significant noise impact to hotel patrons, depending on the hotel design. As mitigation, an interior noise study prepared by a qualified acoustician would be required prior to issuance of building permits for the future hotel, verifying that the guest room interiors will meet the 45 dB CNEL interior noise standard, either with the hotel's architectural details as provided or through upgraded windows, doors or other structural modifications as mitigation measures.

Project

The consultants (Navcon) who carried out the noise surveys of the 2001 EIR selected seven noise measurement locations from the list of 22 locations monitored during the 2000 noise analysis. Noise measurements were conducted at the seven locations in February 2017, and in November 2018. Location L1 was on SeaWorld property; Locations L2, L3 & L4 were in nearby parks, and Locations L5, L6 and L7 were in the nearest residential neighborhoods to SeaWorld. The resultant ambient noise measurements from these more recent noise measurement surveys are summarized below (Table 1).

Table 1 – Ambient Noise Measurement Data Summary

Location Noise Metric	February 23-24, 2017	November 2- 3, 2018
L1 - Guard Gate near South Shore Boat Launch		
1-Hour Leq range:	48 - 60	50 - 60
Lmax range:	60 - 80	60 - 80
L90 range:	46 - 55	46 - 57

L2 - Mission Point Park		
1-Hour Leq range:	54 - 64 dBA Leq	55 - 61
Lmax range:	66 - 79	65 - 74
L90 range:	45 - 50	46 - 52
L3 - Vacation Island		
1-Hour Leq range:	52 - 56 dBA Leq	52 - 57
Lmax range:	65 - 73	62 - 70
L90 range:	45 - 50	46 - 50
L4 - Fiesta Island		
1-Hour Leq range:	58 - 65 dBA Leq	59 - 63
Lmax range:	72 - 89	71 - 84
L90 range:	43 - 47	45 - 55
L5 - Mariners Cove Apartments		
1-Hour Leq range:	65 - 72 dBA Leq	66 - 69
Lmax range:	74 - 88	76 - 88
L90 range:	57 - 63	56 - 61
L6 - Clovis Street & Temecula Street		
1-Hour Leq range:	61 - 68 dBA Leq	56 - 66
Lmax range:	75 - 84	71 - 84
L90 range:	48- 54	50- 53
L7 - Orchard Apartments		
1-Hour Leq range:	68 - 73 dBA Leq	68 - 73
Lmax range:	76 - 84	75 - 96
L90 range:	62- 70	63- 67

Source: Navcon 2017, 2019a, 2019b

The City certified the EIR for the SeaWorld Master Plan in 2001 (SCH No. 1984030708). The certified 2001 EIR evaluated development of the entire SeaWorld Master Plan area, or project area, including noise impacts. This document tiers from the previously certified 2001 PEIR as permitted by Sections 15152 and 15168 of the California Environmental Quality Act (CEQA) Guidelines. Thus, this report only evaluates the potential noise impacts from implementation of the 2020 Master Plan beyond what was analyzed in the 2001 PEIR. Additionally, in April 2019, Dudek noise technicians conducted a technical memorandum which details the results of four studied scenarios for the predictive modeling of outdoor noise propagation of a

planned aerial display of unmanned aerial systems (UAS, or "drones") proximate to the SeaWorld site.

Construction Noise: Noise from construction activities associated with implementation of the 2020 Master Plan EIR would be similar to those assessed in the previously certified 2001 EIR. Construction activities would take place within the same proximate locations as previously assessed. Furthermore, the same construction noise limits and permit application requirements as discussed in the 2001 EIR would apply, ensuring that construction noise would not create a significant noise impact.

Operational Noise: On-site operational noise associated with implementation of the 2020 Master Plan EIR would be similar to noise assessed in the previously certified 2001 EIR, as well as subsequent detailed analyses of potential noise impacts for specific attractions (i.e., Attraction 2018 - Electric Eel Roller Coaster (Navcon 2017), Attraction 2020 – Dive Coaster (Navcon 2019a), and Attraction 2021 – Snowski Coaster (Navcon 2019b). Additionally, an analysis of a proposed drone show was conducted, using 4 potential operational scenarios (Dudek 2019). The drone show, if implemented, would serve as an alternative to fireworks shows (which were addressed in the 2001 EIR, approved by the City and remain a current component of existing operations).

The results of all of the subsequent noise studies concluded that the attractions would not represent a significant noise impact to the community. As part of implementation of the 2020 Master Plan EIR, future attractions or performance shows would continue to be subject to a project-specific noise study prepared by a qualified acoustician prior to issuance of a Coastal Development Permit; the noise study must demonstrate that sensitive receptors would not be exposed to noise levels in excess of applicable standards.

Traffic Noise: Project-related traffic noise was assessed in the previously certified 2001 EIR, where it was determined that Year 2020 traffic noise levels at key roadway segments[1] would not experience a significant noise increase as a result of the implementation of the proposed plan. Traffic noise levels were predicted to increase by no more than 0.1 dB CNEL with the proposed project compared to without the proposed project. In the context of community noise (i.e., outside of controlled conditions such as a listening room), a change in noise level of 1 dB or less is typically not audible. Subsequently, traffic noise levels for the years 2025 and 2040 were assessed as part of the 2020 Master Plan EIR; the results of the updated traffic noise assessment show that similar to the analysis conducted for the 2001 EIR, project-related traffic noise would not increase significantly; the maximum predicted noise level increase would be approximately 0.4 dB CNEL or less. Thus, consistent with the results for the 2001 EIR there would not be a significant traffic noise impact.

Airport Noise: The nearest airport from the project site is San Diego International Airport (SDIA). The project site is located within the Airport Influence Area of the SDIA's Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority 2014). However, the project site is located outside of SDIA's 60 dBA CNEL noise contour. As stated in Policy N.1

[1] Based upon the 2001 EIR, key roadway segments were identified as those roadways which would carry project-related traffic and along which noise-sensitive receivers existed.

of the ALUCP, "Land uses located outside the 60 dB CNEL contour are not subject to the noise compatibility policies and standards of this ALUCP."

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to previous evaluated noise impacts discussed in the 2001 EIR. Therefore, the project would not result in any new significant impacts, nor would there be a substantial increase in the severity of impacts from that described in the 2001 EIR. The mitigation measures associated with noise from the 2001 EIR [Mitigation Measures 4.7-1 and 4.7-2, are still applicable from the 2001 EIR and a full description can be found in Section VI Mitigation, Monitoring, and Reporting Program, of this addendum.

Recreational Resources

2001 SeaWorld Master Plan Update EIR

As analyzed in the 2001 EIR, the proposed project would result in significant impacts to the circulation system in the vicinity of SeaWorld in Mission Bay Park. However, these-SeaWorld's traffic impacts would be mitigated to below a level of significance through fair-share contributions to various traffic improvements. As a result, the proposed project would not result in a significant impact to Mission Bay Park circulation system, and therefore would not discourage park users from frequenting the park. In terms of access, the 2001 EIR found the ingress and egress to SeaWorld to be adequate; the proposed project would not cause a significant impact to traffic conditions that would discourage other Mission Bay Park users from frequenting the Park. The existing pedestrian/bicycle pathway would also not be significantly affected by the proposed project because vehicular circulation would not significantly impede pedestrian/bicycle circulation in the vicinity of SeaWorld.

Project

The proposed project would not result in adverse traffic conditions that would impede vehicular access to, or pedestrian/bicycle usage of, recreational facilities in Mission Bay Park or the Mission Beach area. Therefore, as described in the 2001 EIR, the project would not result in significant impacts relative to recreational facilities access and no mitigation measures are recommended.

Sewer

2001 SeaWorld Master Plan Update EIR

According to the 2001 SeaWorld Master Plan Update EIR implementation of the SeaWorld Master Plan Update would not result in significant impact on sewer and water facilities. Although SeaWorld's water consumption and sewage generation will increase over time, this growth already was contemplated and approved in the 1985 SeaWorld Master Plan and Environmental Impact Report, RQD No. 84-0160, SCH #84030708, dated February 1985.

In addition, the City of San Diego Water Design Guidelines and City of San Diego Sewer Design Guideline contain policies for construction of increased water and sewer facilities to accommodate growth. The policies in the water and sewer design guidelines are implemented as part of every development project in the City to ensure that no project causes significant water and sewer impacts. To ensure adequate sewer facilities, SeaWorld is required to

prepare a Sewer Study in conformance with the City Sewer Design Guidelines. This study will evaluate the existing sewer system from the SeaWorld leasehold to the nearest trunk sewer line (18 inches or longer) to determine whether the existing facilities have sufficient capacity to accommodate new sewage generated by SeaWorld's development. After this study is approved, SeaWorld would be required to construct any facilities to serve its property in conformance with the Sewer Study. Subsequent to implementation of any sewer facilities, SeaWorld would pay for an obtain sewer connections for the new development.

Project

In November 2019, Brown and Caldwell (BC) performed an update to the 2014 Sewer Capacity Study conducted at the SeaWorld. BC completed the 2014 sewer capacity study that included flow monitoring in nine sewer manholes, a manhole invert survey of 16 manholes, observation of manhole and sewer system conditions, flow data analysis, sewer system hydraulic modeling, capacity analysis, and recommendations to increase throughput of the sewer system. The results of the 2014 study identified a bottleneck in the lower portion of the west side sewer with elevated peak flows, causing surcharging into the upstream reaches. Since the 2014 study, BC recognizes that SeaWorld has implemented the following operational changes:

- The East Flamingo habitat was removed in 2017;
- The waterfowl at West Shipwreck were changed from flamingoes to duck in 2016; the significant reduction in number of waterfowl and change in type has led to a 50 percent reduction in backwashing;
- At the Main Plant Recovery, the backwash flow rate was adjusted, and the duration of the backwash operation was extended in 2015;
- In 2015, the cleaning process at Cascades Flamingo was changed from straight dump for cleaning to controlling the flow during the draining process; and
- The Dolphin Amphitheater Recovery stopped receiving backwash from the primary filtration from Journey to Atlantis/Wild Arctic in approximately 2017.

BC's 2019 sewer study found that all four sewer manholes evaluated exhibited changes in their flow regimen, likely due to operational changes enacted since the 2014 study.

- **Location JS.** Location JS was impacted by the reduction in backwash flow rate and duration in backwash operations at the Main Recovery Plant. Although the frequency of surcharging was reduced in comparison to the 2014 study, the typical height of the surcharge at JS was greater in 2019. Reductions in surcharge frequency at this downstream location likely contributed to lower surcharge frequencies observed at upstream manholes. However, this location experiences peak flows from all of the upstream activities, and the 10-inch-diameter main between JX and JS is still a bottle neck in the system. This capacity restriction continues to cause propagation of surcharge upstream, although the impact appears to be somewhat less than it was in 2014.
- **Location JR.** JR was impacted by changes in waterfowl type at West Shipwreck, resulting in a 50 percent reduction in backwashing. Only five surcharge events occurred during the monitoring period, compared with nine events in 2014. These events can be tied to specific operational activities, specifically backwash events occurring at the Main Plant and at Shipwreck.
- **Location JM1.** JM1 was impacted by the change in cleaning process at Cascades

Flamingo changed from a straight dump to a controlled flow during the draining process. Only five surcharge events occurred during the monitoring period, compared with eight events in 2014. These events can be tied to specific operational activities, specifically backwash occurring at the Main Plant and maintenance activities at the Aquarium, Shark and Otter area, Shipwreck, and Cascades. The surcharge event that occurred during the Cascades pool drop was also accompanied by backwash events at the Main Plant and from a facility called ESO#3 in the maintenance logs.

- **Location JL.** JL was impacted by the removal of the East Flamingo habitat and operational changes to the Dolphin Amphitheater Recovery. Only three surcharge events occurred during the monitoring period, compared with six events in 2014.These events can be tied to specific operational activities, specifically backwash events occurring at the Main Plant.
- **Cascade Pool Drops.** The Cascade pool drops caused some of the longest duration surcharging in three of the four study manholes (not JL); however, the level was well below the ground surface and does not pose risk of a sanitary sewer overflow (SSO). Furthermore, these pool drops occur while the park is closed to the public, so any potential odor issues would not be noticed by anyone except SeaWorld staff.

BC makes the following operational recommendations to SeaWorld for implementation to mitigate existing capacity and condition issues in the near-term:

- Backwash events have the potential to overlap with one another, as well as on top of peak visitor-induced flows, and appear to cause some of the highest flow spikes. Continued operational improvements geared towards controlling the magnitude and timing of backwash events, particularly in regard to Cascades and the Main Plant, may be effective tools to reduce the frequency, duration and magnitude of capacity surcharging. These operational improvements could include automation sensors or automation controls in the system to allow sequencing of backwash events.
- Perform maintenance activities at the Main Plant ahead of scheduled inclement weather in order to prevent excessive surcharging or SSOs that could be caused by concurrent backwash and large storm events.
- Install a Smart Cover at Manhole JS. Smart Covers measure remote site water levels in real-time and can give instant feedback about water levels or provide means for automation control to sequence operations, thereby allowing SeaWorld staff to implement measures to prevent SSOs caused by surcharge from maintenance activities on top of storm-induced flows. Consider installing Smart Covers on other manholes as well.
- Notify the City of required repairs to the liner in manhole JZ and to cap the sewer line north of Shark, as noted in the 2014 report.

BC also evaluated additional sewer systems recommendations related to mitigating surcharging at Manhole JS caused by activities at the Main Plant and other facilities; however, these measures are not recommended at this time.

Based on the implementation of BC's 2019 Sewer Capacity Study Update recommendations, as well as the City of San Diego Water Design Guidelines and City of San Diego Sewer Design

Guideline policies, there is no evidence that the project would result in significant sewer impacts.

Transportation/Traffic

2001 SeaWorld Master Plan Update EIR

The 2001 EIR identified significant, but avoidable impacts for both roadway segments and intersections in year 2005, in year 2020, and impacts related to parking. The 2001 EIR includes specific mitigation measures to address transportation and circulation impacts specific to the development of the project. With implementation of the mitigation measures a less than significant impact was identified in the 2001 EIR.

Complete Communities: Housing Solutions and Mobility Choices EIR

The City of San Diego adopted the Complete Communities: Mobility Choices ordinance as part of its implementation of Senate Bill 743 (SB 743) and transition from Level of Service to Vehicle Miles Traveled as the CEQA metric of significance for transportation impacts. Mobility Choices is a programmatic approach to ensure Citywide VMT reductions for both discretionary and ministerial projects. Therefore, relative to transportation/traffic, this addendum also tiers from the Complete Communities: Housing Solutions and Mobility Choices EIR. This EIR discloses that the Complete Communities: Mobility Choices Program would reduce citywide VMT, but since the timing and specific location of improvements is not known, the Complete Communities: Mobility Choices EIR concluded a significant and unavoidable transportation VMT impact. The Complete Communities: Housing Solutions and Mobility Choices EIR was certified by City Council on November 9, 2020 and became effective January 8, 2021.

Project

Linscott Law & Greenspan (LLG) prepared a Local Mobility Analysis (LMA) report, dated June 2022 and a Vehicle Miles Traveled (VMT) report, dated June 2022, for the project. The Local Mobility Analysis (LMA) of the 2020 SeaWorld Master Plan was conducted to review the Project's traffic impacts. Under the previous 2002 Master Plan, SeaWorld had projected an annual growth rate of 1.3 percent resulting in 4.4 million annual attendees by the Year 2020, and a Year 2020 projection of 23,000 average daily trip (ADT) with a maximum traffic generation envelope of 30,300 ADT. The analysis resulted in 18 significant transportation impacts.

While Level of Service (LOS) analysis is no longer used to determine CEQA transportation impact significance, the City still requires LOS analysis to determine whether a project would trigger traffic improvements, according the City's Transportation Study Manual (September 2020) which was adopted by City Council on November 9, 2020 as part of the Complete Communities: Mobility Choices program. As demonstrated in this report, the level of service analysis for the revised Project, would result in no new impacts (under the threshold used in the 2002 report) and in many cases, previously identified impacts would not occur.

In addition, several network improvements have been completed in the study area to reduce congestion or improve traffic conditions off site, many of which are consistent with mitigation measures recommended in the previous 2002 Master Plan EIR, such as the W. Mission Bay Drive bridge.

It was concluded that the additional 6,295 ADT at 2040 buildout anticipated with the proposed 2020 Master Plan would be substantially less than those assessed in the previous 2002 Master Plan EIR (15,300 ADT by 2020 buildout). The analysis presented in this report demonstrates that no new significant level of service-based transportation impacts would result from revisions to the previously adopted 2002 Master Plan and no additional mitigation measures are required.

A VMT Analysis for 2020 SeaWorld Master Plan was prepared to evaluate the transportation impacts of the Project using Vehicle Miles Traveled (VMT), as proposed by the California Governor's Office of Planning and Research (OPR) to implement California State Law Senate Bill (SB) 743. The analysis methodology contained in this report utilizes an approach from the City's Transportation Study Manual (TSM), dated September 2022, which generally follows the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA, dated December 2018. The analysis concluded that project components would be expected to add 62,605 VMT to the region before accounting for Project Design Features. Project Design Features, as described below, would reduce the project's added VMT to the region by 30,172.

For the Project Hotel component, LLG used the SANDAG Series 14 Base Year 2016 online screening map to obtain the Project's Employee VMT per Employee at the Census Tract level, which was then compared to the regional average Employee VMT per Employee, also taken from the SANDAG Series 14 Base Year 2016 data. Based on the screening map, the Project VMT per Employee would be 27.9, or 102.6% of the regional average of 27.2. After including proposed Project Design Features the Project Employee VMT per Employee is 22.9, or 84.2% of the regional average. The threshold of significance for commercial employment projects is 85% of the regional average Employee VMT per Employee, or 23.1 The Project Hotel component is therefore below the threshold of significance and is calculated to result in no significant transportation VMT impact with the required design features in place (LLG 2020a).

The VMT reducing project design features regarding pedestrian, bicycle, transit and TDM improvements are incorporated as development and design criteria in the 2020 Master Plan. The implementation of these features will be assured through the project review process for individual development projects proposed under the 2020 Master Plan. The project design features are listed below; items labelled PI, BI, TI, CTR are project design features required through the City's CAP consistency checklist, and those labelled OS are additional off-site measures.

Pedestrian Network Improvements

- **PI-1:** Provide a minimum 10-foot wide public accessway (vertical access) from Perez Cove Way to shoreline somewhere between the existing Skyride station and the driveway/aisle at the southern end of the north employee parking lot (approximately 550 feet), with the final location to be determined when the final plans for the hotel are submitted for review.
- **PI-2:** Enhance the existing pedestrian paths along the Perez Cove shoreline by providing a minimum 10-foot-wide landscaped public walkway (lateral shoreline access) incorporated into the marina expansion design.

- **PI-3:** Enhance the shoreline access by providing a minimum 10-foot-wide landscaped public shoreline walkway (lateral shoreline access) along the waterfront that shall be incorporated into the hotel plans.
- **PI-4:** Continue to provide ongoing maintenance of the existing pedestrian/bicycle pathways within the project site.

Bicycle and Micromobility Improvements

- **BI-1:** Maintain the bicycle racks provided on-site (currently 27 spaces) at the main entrance. Monitor demand for bicycle parking and provide additional spaces as demand increases. This is a CAP Consistency Checklist item.
- **BI-2:** Maintain the employee bicycle racks at both the west security (currently 18 spaces) and east security (currently 10 spaces) employee entrances. Monitor demand for employee bicycle parking and provide additional spaces as demand increases. This is a CAP Consistency Checklist item.
- **BI-3:** Enhance the shoreline access with future expansion of the marina and hotel development by providing a minimum 10-foot-wide landscaped public shoreline walkway (lateral shoreline access) along the waterfront.
- **BI-4:** Provide plug-in stations at the bicycle storage area for electric bikes or other micro mobility vehicles, as demand warrants it.
- **BI-5:** Reserve space for parking alternative and micromobility vehicles such as shared use bikes, scooters, and similar services. The space will be publicly accessible, provide electricity, and be provided for free to one or more micromobility service providers. If space set aside for micromobility devices is not utilized by micromobility devices/services, this space will be used to provide additional bicycle racks as demand increases.
- **BI-6:** Continue to provide ongoing maintenance of the existing pedestrian/bicycle pathways within the project site.

Transit System Improvements

- **TI-1:** Improve the amenities at the existing SeaWorld bus stop (Stop ID: 13059) to meet all standard MTS design criteria for 201-500 passenger boardings, which will include the following amenities not currently provided:
  - Passenger Shelter
  - Route Map
- **TI-2:** Coordinate with MTS regarding Route 9 service to the SeaWorld bus stop to extend the existing span of service, currently 9:06 AM to 4:08 PM, to match SeaWorld's hours of operation.
- **TI-3:** Coordinate with SANDAG, City of San Diego, and MTS to accommodate a Transit Station within the Area 2 parking lot per the terms of the SeaWorld Lease, when the

opportunity arises. Design of the future parking structure, if necessary, would accommodate a transit station.

Commute Trip Reduction Measures

- **CTR-1:** CAPCOA TRT-3: Provide Ride-Sharing Program – The Project will promote ride-sharing programs through a multi-faceted approach to include: designating up to five percent of employee parking spaces for ride-sharing vehicles depending on demand, designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles, and providing a web site or message board for coordinating rides. This is a CAP Consistency Checklist item.
- **CTR-2:** CAPCOA TRT-7: Implement Commute Trip Reduction Marketing – The Project shall promote the use of the bike share/micro mobility fleet and educate employees on the non-SOV transportation options in the area through participation in SANDAG's iCommute program. To realize the VMT reduction associated with CTR-2/TRT-7, the TDM Plan identified in this report must be marketed to new and existing employees through a website maintained by the employer, monthly email newsletter blasts, promotional materials made publicly visible in common areas, and through an information packet that will accompany new hire documentation, including all part-time employees. This is a CAP Consistency Checklist requirement item.
- **CTR-3:** As part of the TDM Plan, the Project will dedicate an employee within the park to the role of "Transportation Coordinator (TC)." The TC would be responsible for developing, marketing, implementing, and evaluating the commute VMT reduction measures offered through the TDM Plan.
- **CTR-4**: As part of the TDM Plan, the Project will implement an updated employee transit pass program, which will include a 25 % employee transit pass subsidy for all full- time, part-time, and temporary/seasonal employees working on the property. The subsidy value will be limited to the equivalent value of 25% of the cost of an MTS "Regional Adult Monthly/30-Day Pass" (currently $72 for a subsidy value of $18 per month). The program will also include a ticket discount of $5 to guests who show their bus pass.

Off-Site Active Transportation Measures

- **OS-1:** Complete sidewalk along the north side of Sea World Drive from E. Mission Bay Drive-Pacific Highway to the I-5 freeway southbound ramps. This improvement is consistent with the Fiesta Island / MBPMP Amendment.
- **OS-2:** Complete sidewalk along the north side of SeaWorld Drive from Friars Road to E. Mission Bay Drive-Pacific Highway. Construct ADA compliant curb ramps on the northeast and southeast corners at Sea World Drive/E. Mission Bay Drive-Pacific Highway. Install current City of San Diego standard crosswalks and pedestrian countdown signal heads on all legs of this intersection. This improvement is consistent with the Fiesta Island / MBPMP Amendment.
- **OS-3:** Complete sidewalk along the north side of SeaWorld Drive from South Shores Parkway to Friars Road. Construct ADA compliant curb ramps on the northwest and

northeast corners of SeaWorld Drive / South Shores Parkway. Install current City of San Diego standard crosswalks and pedestrian countdown signal heads on all legs of this intersection.

- **OS-4:** Restripe existing Class II bicycle lanes SeaWorld Drive from E. Mission Bay Drive to Friars Road to include a minimum three (3) foot buffer between the travel lane and the bicycle lane. Provide bicycle detection and painted bicycle detection location indicators at the signalized intersections of Sea World Drive and E. Mission Bay Drive/Pacific Highway and Sea World Drive and Friars Road if bicycle detection is not currently present. This improvement is consistent with the Fiesta Island / MBPMP Amendment.
- **OS-5:** Restripe existing Class II bicycle lanes on SeaWorld Drive from Friars Road to South Shores Parkway (Class I Bicycle Path entrance) to include a minimum three (3) foot buffer between the travel lane and the bicycle lane. Provide bicycle detection and painted bicycle detection location indicators at the signalized intersection of Sea World Drive/South Shores Parkway if bicycle detection is not currently present. This improvement is consistent with the Fiesta Island / MBPMP Amendment and will require an Encroachment Permit from Caltrans.
- **OS-6:** Provide loop detection for vehicles and bikes in both directions of travel onSeaWorld Drive at the I-5 interchange. This improvement is being provided as a countermeasure for study area intersections that meet the Systemic Safety hotspot criteria per the City's Transportation Study Manual and Local Mobility Analysis requirements. This improvement will require an Encroachment Permit from Caltrans.
- **OS-7:** Provide loop detection for vehicles and bikes in both directions of travel on Ingraham Street at Riviera Drive (Systemic Safety). This improvement is being provided as a countermeasure for study area intersections that meet the Systemic Safety hotspot criteria per the City's *Transportation Study Manual* and Local Mobility Analysis requirements.

Projects that utilize the City's Complete Communities: Mobility Choices Program to provide mitigation for VMT transportation impacts are able to rely upon the findings and statement of overriding considerations from the City's EIR, which was certified on November 9, 2020 by the City Council. The Mobility Choices Program allows a project that has significant VMT impacts to use compliance with the Program regulations as mitigation measures along with any other available mitigation measures "to the extent feasible." However, full compliance with these regulations still results in a significant and unavoidable transportation VMT impact, as explained in the City's Complete Communities: Housing Solutions and Mobility Choices EIR.

The Complete Communities: Mobility Choices regulations in SDMC section 143.1103(a) divide the City into four (4) Mobility Zones. SeaWorld is in Mobility Zone 2 which corresponds to any premises located either partially or entirely in a Transit Priority Area outside of the Downtown Community Planning Area. To satisfy the requirements set forth in SDMC section 143.1103(b), the Mobility Choices implementation guidelines include a list of VMT Reducing Measures and corresponding point values. Development in Mobility Zone 2 shall include VMT Reduction Measures totaling at least 5 points.

The previously described measures would result in a total of nine (9) points within the Mobility Choices framework, while off-site measures would result in an additional seven (7) points. The total sixteen (16) points exceeds the minimum of five (5) required in Mobility Zone 2 and the

project satisfies the requirements of the Mobility Choices Regulations. Therefore, the proposed project would not result in a new significant traffic/transportation impact, nor a substantial increase in the severity of any traffic/transportation impacts, beyond those described in the 2001 EIR and Complete Communities: Housing Solutions and Mobility Choices EIR.

Water Conservation

2001 SeaWorld Master Plan Update EIR

The 2001 EIR identified that although the project would increase water consumption, SeaWorld would continue to develop, exercise, and implement water conservation programs. Because no significant impacts were identified in the 2001 EIR, no mitigation is required. However, in an effort to continually develop programs to decrease water consumption, SeaWorld would implement mitigation measure 4.13-1 (see full description of Mitigation Measure 4.13-1 in Section VI, Mitigation Monitoring, and Reporting Program of this addendum) in which SeaWorld will continue to apply its existing water conservation programs and consider implementation of water conservation programs to minimize water consumption associated with the new attraction or facility.

Project

Special projects including the hotel, marina, and parking garage would result in an increase in water consumption. However, the amount of water consumption associated with the Special Projects would not result in the use of excessive amounts of water given the nature of these land uses. SeaWorld implements state-of-the-art water conservation programs which reduce park-wide water consumption. Continuance of these programs and implementation of future programs would ensure that no significant impacts associated with water conservation would result from the proposed project. Because no significant impacts are identified, no mitigation is required. However, in an effort to continually develop programs to decrease water consumption, SeaWorld will implement Mitigation Measure 4.13-1 (see full description of Mitigation Measure 4.13-1 in Section VI, Mitigation Monitoring, and Reporting Program of this addendum) in which SeaWorld will continue to apply its existing water conservation programs and consider implementation of water conservation programs to minimize water consumption associated with the new attraction or facility. As with the 2001 EIR, no significant impacts were identified.

Hydrology/Water Quality

2001 SeaWorld Master Plan Update EIR

The 2001 EIR provided a description of the best management practices (BMPs) SeaWorld implemented to comply with its existing National Pollutant Discharge Elimination System (NPDES) Permit No. CA0107336 (NPDES Permit) and proposed measures to minimize water quality impacts from master-planned activities that would also comply with Construction General Permit (CGP) requirements, if a CGP is required. The existing BMP programs at SeaWorld initially identified in the 2001 EIR include:

Non-Structural BMPs

- Good Housekeeping: Waste management and litter control, employees picking up litter, sweeping and vacuuming impervious surfaces, sweeping and periodically pressure washing, keeping dumpsters covered, and recycling.
- Preventative Maintenance: Drain inlet set up and maintenance, drain inlet cleaning, yearly replacement of oil absorbent socks, routing stormwater runoff through catch basin, prohibiting marine habitat and pool draining activities during stormwater bypass discharge events, quarterly maintenance activities at the on-site waste water treatment plants, periodic maintenance and cleaning of roofs and gutters.
- Spill Prevention and Response: Supervise bulk oil and chemical deliveries and transfer, confirming tank liquid levels, using secondary containments during chemical transfer, performing monthly inspections, cleaning up chemical leaks, and locating spill kits in area of potential spillage.
- Material Handling and Storage: Provide proper storage information, encourage recycling and proper disposal of hazardous materials, prohibit uncovered storage of hazardous materials, rainfall protection techniques, prohibit material transfer during storm event, prohibit use of pesticides and herbicides that have been prohibited by the United States Environmental Protection Agency, spill prevention practices, and transporting practices.
- Erosion Control and Site Stabilization: Long-term erosion control measures, vegetation management, and herbicide/pesticide and fertilizer management to minimize stormwater contaminants.
- Public Education: Participate in public education and industrial outreach program to reduce stormwater pollution through public education and raise the level of awareness of water quality issues.

Structural BMPs

- Overhead Coverage: Provide coverage on structures that protect materials, chemicals, and pollutant sources; separated roofed, secondarily contained and locked storage of hazardous materials; and storage lockers with ventilation for flammable material
- Retention Ponds: A concrete retention basin near the northern property boundary was installed to contain stormwater runoff from a 100-year, 24-hour event.
- Secondary Containment Structures and Control Devices: Outdoor storage containers are elevated to precent run-off.
- Inlet Controls: Where feasible, stormwater runoff is routed through catch basin inserts (i.e., Fossil Filter or Drain Pac). These inserts remove sediments, oil and grease, and other pollutants before they enter the storm drain system.
- Oil/Water Separator: A 750-gallon OWS located at the Journey to Atlantis, two 1,000-gallon concrete OWS located at wash rack area, and a 500-gallon OWS located at the Oiled Wildlife Care Center.

Proposed BMPs to minimize Water Quality Impacts from Master-Planned Activities

- Compliance with SeaWorld's SWPPP and NPDES Permit.
- Directing 100 percent of runoff from newly constructed areas into the storm water treatment facilities.

Controls During Construction Activities

- Erosion and Sediment Controls: Perimeter and shoreline controls, daily street sweeping and dry cleanup, covered stockpiles, gravel construction entrances and tire washes, and revegetation.
- BMPs for Oil, Grease and Lubricants: Conduct maintenance, fueling, and washing site in designated areas; properly maintain vehicles and equipment; repair leaks promptly; place drip pans under vehicles or equipment; equip sites with spill control kit; and store fuels, oils, and lubricants in contained storage areas.
- BMPs for Organics, Pesticides, Fertilizers, and Other Materials: Storing materials offsite or inside locked and contained storage; purchasing only what is needed for the job; using fewer toxic materials, equipping sites with spill control kits; and avoiding over-irrigation of newly planted slopes.
- BMPs for Concrete: Performing washout of concrete trucks in designated areas; not washing out concrete trucks into storm drains, open ditches, streets, or stream; washing out trucks in designated facilities; not allowing excess concrete to be dumped on site; locate washout areas at least 50 feet from storm drains, open ditches, or water bodies; please the washout waste into a temporary washout area; and implement washouts in a manner that prevents leaching.

Controls During Long-Term Operation

Over the operating life of the facilities there will be some potential to impact water quality from sources such as equipment maintenance, animal wastes, and intensive visitor use. As part of SeaWorld's SWPPP, controls are evaluated, and additional BMPs will be added as needed.

Permitting Considerations

In accordance with State Water Resources Control Board Order 2009-0009-DWQ (as amended by 2010-2014 DWQ and 2012-0006-DWQ), any construction or demolition activity that results in a land disturbance equal to or greater than 1 acre is subject to the CGP; therefore, if the collective land area to be disturbed by concurrent active projects described in the Master Plan Update will exceed 1 acre, SeaWorld will need to seek coverage under the CGP during construction activities. Compliance with this permit will involve preparing a construction SWPPP that outlines specific BMPs to be implemented to minimize pollutants in runoff from the construction sites.

The CGP SWPPP will be consistent with the types of activities outlined above and will provide more detail, including detailed drawings that illustrate where specific BMPs will be implemented on each site.

In addition, the San Diego Regional Water Quality Control Board updated the NPDES Permit with a new Order No R9-2018-0004 adopted June 20, 2018. As a result, the NPDES Permit contains updated and more stringent discharge and monitoring requirements than the NPDES Permit described in the 2001 EIR. SeaWorld will continue to comply with all requirements of the NPDES Permit pursuant to the 2018 Order.

Mitigation, Monitoring, and Reporting

Mitigation Measure 4.5-1

Mitigation Measure 4.5-1 stated that future expansion activities at SeaWorld Marina shall include the following:

1. Installation of an automatic shutoff on the fuel pump;
2. Regular inspection of the sanitary pumpout on a routine basis;
3. Prohibiting boat hull paint removal and repainting in the marina area; and
4. Prohibiting in-water hull scraping to remove marine growth and collecting and properly disposing of any marine material removed from hulls.

Provisions 1 through 3 of Mitigation Measure 4.5-1 have been fulfilled. Regarding provision 4, routine boat maintenance for tenants occurs, which is typical of all marina operations. Agreements with tenants ensure that vessels are properly maintained. More extensive repair and maintenance activities are typically performed off site or in dry dock.

Mitigation Measure 4.5-2

Mitigation Measure 4.5-2 stated that, within two years of the approval of the SeaWorld Master Plan Update by the Coastal Commission, SeaWorld will install catch basin inserts such as a Fossil Filter, or equivalent, to capture oil and grease in runoff at the point where it enters the storm drain system from parking lots and fueling areas.

The provisions of Mitigation Measure 4.5-2 have been fulfilled.

Mitigation Measure 4.5-3

Mitigation Measure 4.5-3 stated that, in order to reduce cumulative water quality impacts related to construction to below a level of significance, a Master SWPPP shall be prepared and approved by the City Engineer and Regional Water Quality Control Board. This Master SWPPP shall include general as well as specific measures which will be implemented to control water pollution related to construction. At a minimum, the Master SWPPP shall include the following provisions or their equivalent:

<u>Erosion and Sediment Controls</u>

1. Surface runoff shall be directed to the SeaWorld surface runoff treatment collection system except during times of high rainfall;
2. Perimeter and shoreline controls (e.g., straw bales, silt fences) shall be used;
3. Street sweeping and dry cleanup shall be completed daily;
4. Stockpiles shall be covered;
5. Gravel construction entrances and/or tire washes shall be used; and
6. Temporary landscaping shall be used when prolonged exposure may occur.

<u>Oil, Grease, and Lubricants</u>

1. Conduct maintenance, fueling, and washing offsite;
2. Properly maintain vehicles and equipment;
3. Repair leaks promptly;
4. Place drip pans under vehicles or equipment that is parked or stored for long periods;
5. Have spill control kits on the site; and
6. Store fuels, oils, and lubricants in contained storage areas.

Concrete

1. Wash out concrete trucks into earthen pits and remove/dispose of the hardened material;
2. Fill concrete trucks with water and wash them offsite; and
3. Dry and dispose of concrete saw-cut slurry as solid waste.

The provisions included in Mitigation Measure 4.5-3 are superseded by the CGP SWPPP requirements outlined in Section 2.2.3, Water Quality Impacts Associated with Future Shows, of the Water Quality Analysis for the SeaWorld Master Plan Update. Section 2.2.3 outlines a general construction process for Tier 2 projects and potential pollutants and impacts from long-term operation of future shows.

Project

In March 2021, Brown and Caldwell prepared the *Final Water Quality Report for SeaWorld Parks and Entertainment.* This report discussed the potential future impacts relative to potential future construction activities and long-term operation of SeaWorld. After reviewing the proposed master-planned activities and assuming continued compliance with existing BMPs, proposed BMPs under a possible CGP, and the NPDES permit, the SeaWorld 2020 Master Plan does not present significant impacts to water quality, and no mitigation measures are recommended. Thus, the proposed project would not result in a new significant impact, nor would a substantial increase in the severity to water quality impacts from described in the 2001 EIR occur.

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LLG. 2022b. Vehicle Miles Traveled Analysis for 2020 SeaWorld Master Plan. June 10, 2022.Navcon. 2017. *SeaWorld San Diego Attraction 2018 – Electric Eel Noise Study.* March 20, 2017.

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

The project shall be required to comply with the applicable mitigation measures outlined within the MMRP of the previously adopted EIR and those identified with the project-specific subsequent technical studies. The following mitigation measures specifically apply to this project, in addition to any project design features as required in the 2020 Master Plan.

Air Quality:

Mitigation Measure 4.9-1: As a condition of any grading or building permit, construction management procedures shall be implemented to clean up dirt and debris spillage from public roads, and route construction traffic through the least sensitive areas. Use of transportation control measures to encourage carpooling among construction workers and to schedule deliveries to non-peak traffic hours is recommended to reduce adverse, but less than significant impacts from construction-related exhaust emissions.

Biological Resources:

Mitigation Measure 4.6-1: Prior to Coastal Permit application the project proponent shall prepare a project-specific shadow analysis for Tier 2 projects located in future development areas F-2, E-2, G-2 and K-2; and the Future Hotel Special Project to determine the extent of shadow impacts on eelgrass in Pacific Passage, Perez Cove and the Waterfront Stadium lagoon. The shadow analysis shall be performed for the time periods described in Section 4.3, Light, Glare and Shading, in this EIR. If no shadow impact would occur in these areas as a result of the project specific analysis, no further mitigation would be required. If no shadow impact would occur as defined above in these areas as a result of the project specific analysis, no further mitigation would be required. If a shadow impact would occur during this timeframe it would only occur during the eelgrass dormant period as described in the impact analysis above. For shadow impacts that would occur during the eelgrass dormant period, a project specific monitoring program shall be undertaken that includes the provisions described below under eelgrass monitoring program.

Eelgrass Monitoring Program

Once construction is completed at one of the potentially shade impacted sites, three years of eelgrass monitoring shall be conducted, specifically in the early spring (April) and early fall (October) of the three years. These two times of the year would best track the initial growing phase of the eelgrass, in the spring and the post summer peak, and in the early fall, before the dormant period begins. The area to be monitored would be along the shore and out far enough into the water to cover the area where a shadow would be case during the majority of the daylight hours in December. The monitoring program would be initiated once development is completed at each of the sites, and the monitoring schedule at each site would be independent of the other. If the monitoring indicates a reduction in the eelgrass bed coverage, then an eelgrass revegetation program shall be implemented in conformance with the Southern California Eelgrass Mitigation Policy as described below in Mitigation Measure 4.6-2.

Mitigation Measure 4.6-2: Prior to application for development of the Future Hotel project landing dock and the Marina Expansion project, a project-specific shadow analysis shall be conducted as described above in Mitigation Measure 4.6-1 to determine the exact area of impact resulting from docks and boats. For these impacts eelgrass shall be replaced at a 1.2:1 ratio, which is in conformance with the eelgrass replacement ratios outlined in the Southern California Eelgrass Mitigation Policy. Furthermore, a pre- and post-construction eelgrass survey shall be undertaken to determine the area of eelgrass habitat that would be impacted by the shadows. The proposed projects could require the creation of approximately 1.12 to 1.20 acres of eelgrass. This scenario assumes that al of the shading impacts would occur under the pier, dock, and permanent boat placement.

Eelgrass mitigation sites do not appear to be readily available within the water area of the SeaWorld leasehold. Further exploration of options and alternatives for eelgrass transplant in the amount needed to offset the impacts would have to be conducted under an eelgrass mitigation plan study, which would be determined when the marina expansion or landing dock would be developed. The eelgrass mitigation plan study and implementation would be conducted in conformance with the Southern California Eelgrass Mitigation Policy.

Mitigation Measure 4.6-3: Prior to construction of a new development project on the Sea World leasehold, a determination shall be made as to whether the Stony Point Preserve has been recolonized by the California least tern. If it has not been recolonized then implementation of the following mitigation measure would not be required. Should the Preserve be recolonized, a determination shall be made as to whether the new development project would provide a clear line-of-sight from perching opportunities on the proposed structure to the Stony Point Preserve.
If it would not provide a clear line-of-sight then no mitigation would be necessary. Should a clear line-of-sight be available from perching locations on the new structure, then the structure would be required to include appropriate design features to eliminate the perching opportunity.

Energy
Mitigation Measure 4.12-1: Prior to operation of any new attraction, SeaWorld shall apply its existing energy conservation programs and shall consider implementation of project-specific energy conservation programs to minimize electrical fuel, and/or natural gas consumption associated with the new attraction.

Geology/Soils
Mitigation Measure 4.8-1: Prior to issuance of a Grading Permit for each portion of the redevelopment, a soils investigation shall be approved by the City Engineer. Appropriate remedial measures shall be incorporated into the grading plans. These measures shall include, but not be limited to the following: 1) monitoring of differential settlement during construction; 2) proper compaction of surficial soils; and 3) installation of a well-compacted structural fill mat (with possible inclusion of geotextile reinforcing fabrics) above the water table in building areas, and/or continuous foundation systems for the buildings.

Mitigation Measure 4.8-2: Prior to issuance of the grading permits, the applicant shall prepare site-specific erosion control plans for the project in conformance with the City's Grading Ordinance to the satisfaction of the City Engineer. The erosion control plans should be in substantial conformance with the Conceptual Landscape Plan and the Design Guidelines for the Mission Bay Park Master Plan Update and should include temporary and permanent erosion/siltation control measures and/or devices that would be installed both during and after site grading and construction, including, but not limited to, interim and post-development landscaping/hydro-seeding; jute netting (or other approved geotextile material) on manufactured slopes; sandbags, brown ditches, energy dissipaters and desilting detention basins; and any other methods to control short-term and long-term surficial runoff and erosion.
Prior to approval of grading permits, the applicant shall retain a soils engineer to monitor the grading, construction, and installation of runoff control devices and revegetation of the project

site. The soils engineer shall submit in writing to the City Engineer and the Environmental Review Manager of the Planning and Development Review Department certification that the project has complied with the required notes on the grading plan addressing erosion controls.

Mitigation Measure 4.8-3: Prior to approval of grading permits, a complete subsurface geotechnical investigation of the proposed development area shall be performed to evaluate the thickness and/or the in situ condition of the compacted and hydraulic fill materials and bay deposits. The geotechnical investigation would also provide site-specific remedial grading recommendations, foundation design criteria, and recommendations for the design of surficial improvements. The recommendations shall be implemented as part of project construction.

Mitigation Measure 4.8-4: Prior to issuance of a grading permit for the implementation of projects associated with Master Plan Update the disposal of any anticipated construction-related dewatering effluent shall be permitted by either the City of San Diego or the RWQCB. The effluent could either be directed to the Mission Bay or the San Diego sewer system. If the effluent is discharged to Mission Bay, then the discharge shall meet the effluent limits specified by the RWQCB (Order No. 95-25) and Federal National Pollution Discharge Elimination System (NPDES) requirement. Effluent discharged to the City of San Diego sewer system shall meet the City's standards.

Neighborhood Character/Aesthetics

Mitigation Measure 4.2-1: Prior to development the applicant will prepare and implement a site plan for the project, which complies with the Master Plan Update landscape buffer and bulk/plane setbacks. The site plan will also adhere to the Master Plan Update Design Guidelines that pertain to landscaping, lighting, signs and architectural guidelines.

Mitigation Measure 4.2-2: Prior to each future development the applicant will prepare and implement a site plan for the project, which complies with the Master Plan Update landscape buffer and bulk/plane setbacks. The site plan will also adhere to the Master Plan Update Design Guidelines that pertain to landscaping, lighting, signs, and architectural guidelines.

Noise

Mitigation Measure 4.7-1: Prior to issuance of a Coastal Development Permit, a project-specific noise study prepared by a qualified acoustician shall be required for any new ride attraction or performance show and must demonstrate that sensitive receptors would not be exposed to noise levels in excess of applicable standards.

Mitigation Measure 4.7-2: Prior to issuance of building permits for the future hotel, verification that guest room interiors will meet the 45dB CNEL interior standard shall be required through the preparation of an interior noise study by a qualified acoustician. The measures recommended in this study shall be implemented to meet the required 45 dB CNEL interior standard.

Water Conservation

Mitigation Measure 4.13-1: Prior to operation of any new attraction or facility, SeaWorld shall apply its existing water conservation programs and shall consider implementation of project-

specific water conservation programs to minimize water consumption associated with the new attraction or facility.

VII. IMPACT SIGNIFICANCE

This Addendum also identifies that all significant project impacts would be mitigated to below a level of significance, consistent with the previously certified EIR.

VIII. CERTIFICATION

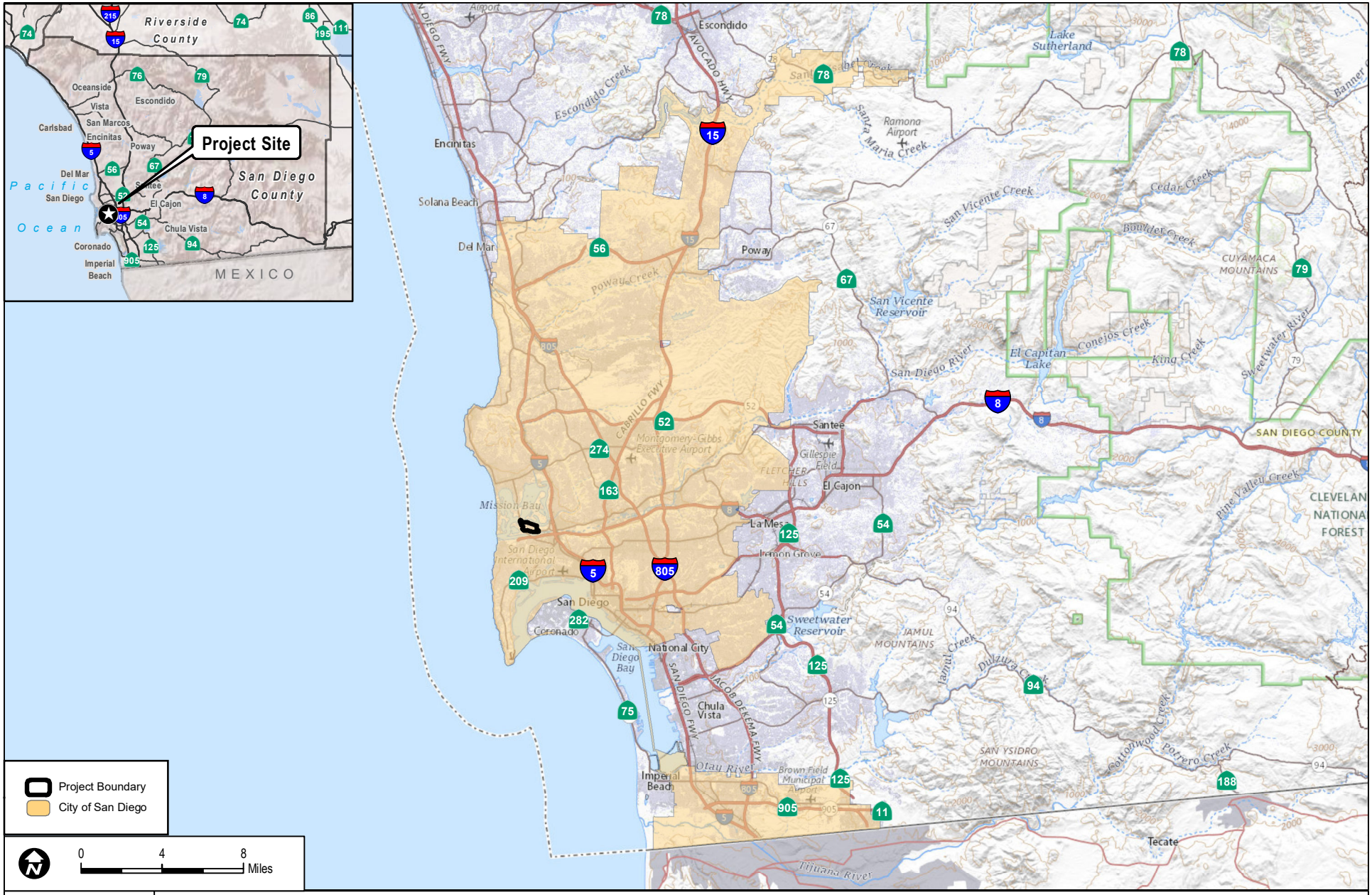
Copies of the addendum, the adopted EIR, the Mitigation Monitoring and Reporting Program and associated project-specific technical appendices, if any, may be reviewed in the office of the Development Services Department, or purchased for the cost of reproduction.

Sara Osborn, Senior Planner
Development Services Department

2/26/2024
Date of Final Report

Analyst: Sara Osborn

Attachments:
Figure 1, Regional Location Map
Figure 2, Project Location



~~R~~Regional Map

Environmental Analysis ~~Section~~ Project No. 646353

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

FIGURE 1

SeaWorld

Project Location

Environmental Analysis Section Project No. 646353

CITY OF SAN DIEGO - DEVELOPMENT SERVICES

FIGURE 2