Beyer Boulevard Slope and Drainage Improvements Project

Addendum to the Final Mitigated Negative Declaration/Initial Study for the San Ysidro Freight Rail Yard Improvement Project

State Clearinghouse No. 2010071032

Prepared for:

401 B Street, Suite 700
San Diego, CA 92101

June 2022

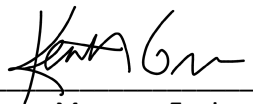
Beyer Boulevard Slope and Drainage Improvements Project
Addendum to the Final Mitigated Negative Declaration/Initial Study for the
San Ysidro Freight Rail Yard Improvement Project
State Clearinghouse No. 2010071032
June 28, 2022

The San Diego Association of Governments (SANDAG), as the Lead Agency under the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.), adopted a Final Mitigated Negative Declaration/Initial Study (MND/IS) for the San Ysidro Freight Rail Improvements Project (Approved Project) on March 4, 2011. SANDAG also filed a Notice of Determination with the California Office of Planning and Research and County Clerk of San Diego on March 4, 2011.

SANDAG proposes modifications to the Approved Project, including additional slope and drainage improvements, as well as the construction of retaining walls and an access road, within an approximately three-acre area on a slope on the west side of the San Diego Metropolitan Transit System (MTS) Blue Line railroad tracks generally between the East Beyer Boulevard overcrossing and north of the San Ysidro Freight Yard main entrance (Proposed Modifications).

This Addendum has been prepared in accordance with the provisions of CEQA and documents that none of the conditions or circumstances that would require preparation of an Environmental Impact Report (EIR) or subsequent MND, pursuant to CEQA Guidelines Sections 15162 and 15164, exists in connection with the Proposed Modifications. The Proposed Modifications would not result in new significant impacts or a substantial increase in the severity of previously identified impacts. There have been no substantial changes proposed to the Approved Project that would require major revisions to the Final MND/IS due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. There have been no substantial changes with respect to the circumstances under which the Approved Project is undertaken which would require revisions to the Final MND/IS. There is no new information of substantial importance which shows that the Approved Project would have significant environmental effects either not discussed or that would be substantially more severe than discussed in the Final MND/IS. Additionally, there have been no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible, nor are there measures or alternatives considerably different than those analyzed in the Final MND/IS that would reduce identified significant impacts.

Therefore, preparation of an EIR or subsequent MND is not required, and the appropriate CEQA document for the Proposed Modifications is this Addendum to the Final MND/IS for the San Ysidro Freight Rail Yard Improvements. No additional environmental analysis or review is required for the Proposed Modifications.



Keith Greer, Manager Environmental Compliance — July 6, 2022 (Date)

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1. INTRODUCTION

The San Diego Association of Governments (SANDAG), as the Lead Agency under the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.), adopted a Final Mitigated Negative Declaration/Initial Study (MND/IS) for the San Ysidro Freight Rail Improvements Project (herein referred to as Approved Project) on March 4, 2011 (State Clearinghouse [SCH] No. 2010071032). SANDAG also filed a Notice of Determination (NOD) with the California Office of Planning and Research and County Clerk of San Diego on March 4, 2011. Additionally, a Mitigation, Monitoring, and Reporting Program (MMRP) was adopted for the Approved Project in March 2011. The Final MND/IS (in its entirety) is hereby incorporated by reference into this environmental document pursuant to CEQA Guidelines Section 15150.

Potentially significant impacts were identified in the Final MND/IS with respect to biological resources, cultural resources, paleontological resources, and hazards and hazardous materials. All potentially significant impacts would be reduced to less than significant levels with the implementation of mitigation measures identified in the Final MND/IS.

SANDAG proposes modifications to the Approved Project, including additional slope and drainage improvements, as well as the construction of retaining walls and an access road, within an approximately three-acre area on a slope on the west side of the San Diego Metropolitan Transit System (MTS) Blue Line railroad tracks generally between the East Beyer Boulevard overcrossing and north of the San Ysidro Freight Yard main entrance. These changes to the Approved Project, which are described in greater detail in Section 5, are herein referred to as Proposed Modifications.

The purpose of this Addendum is to provide environmental clearance of the Proposed Modifications under CEQA by demonstrating that they would not result in new or substantially more severe significant impacts relative to the Approved Project as described in the Final MND/IS. This Addendum outlines the CEQA requirements for an addendum; describes the environmental setting, Approved Project, and Proposed Modifications; evaluates environmental impacts that would result from the Proposed Modifications in comparison with those previously identified for the Approved Project, and makes a determination that an addendum is the appropriate level of CEQA documentation for the Proposed Modifications.

2. CEQA REQUIREMENTS FOR AN ADDENDUM

CEQA Guidelines Sections 15162 and 15164 set forth criteria to assess which CEQA environmental compliance document is appropriate for modifications to an approved project: a subsequent Environmental Impact Report (EIR), subsequent MND, addendum, or no further CEQA documentation.

An addendum to the Final MND/IS is permitted under CEQA Guidelines Sections 15162 and 15164 for projects where there are no substantial changes to the project, or in circumstances surrounding the project, and where the project would not have new significant impacts or substantially more severe impacts than those disclosed in the previously approved negative declaration. To summarize, Sections 15162 and 15164 of the CEQA Guidelines state that an addendum to a previously approved negative declaration can be prepared for a project if the criteria and conditions summarized below are satisfied:

- **No Substantial Changes**. There are no substantial changes proposed in the project that will require major revisions to the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- **No Substantial Change in Circumstances**. No substantial changes to the circumstances regarding the project have taken place that would require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- **No Substantial New Information**. There is no new information of substantial importance that was not known or could not have been known at the time of the previous negative declaration that shows: (1) the project would have one or more significant effects not discussed in the previous negative declaration; (2) significant effects previously examined would be substantially more severe than shown in the previous negative declaration; (3) 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 (4) mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

An addendum need not be circulated for public review but can be included in or attached to the adopted negative declaration (CEQA Guidelines Section 15164(c)). The decision-making body shall consider the addendum with the adopted negative declaration prior to making a decision on the project (CEQA Guidelines Section 15164(d)).

Environmental analysis of the Proposed Modifications is included in Section 6 of this Addendum and forms the basis to support the environmental determination contained in Section 7 of this Addendum. Based on the information presented in Section 7, none of the conditions identified in CEQA Guidelines Section 15162(a) requiring a subsequent MND or EIR would occur. As such, an addendum was prepared for the Proposed Modifications.

3. ENVIRONMENTAL SETTING

The location of the Approved Project and Proposed Modifications occur within the southeast portion of the City of San Diego community of San Ysidro. The Approved Project evaluated in the Final MND/IS comprised an approximately 59-acre area along the San Diego & Arizona Eastern (SD&AE) Railway South Line and MTS Blue Line consisting of an approximately one-mile long northwest/southeast trending railroad/trolley corridor, as well as undeveloped land, in the vicinity of the San Ysidro Freight Rail Yard. The Proposed Modifications would encompass an approximately three-acre area entirely within the limits of the Approved Project site evaluated in the Final MND/IS. Specifically, the Proposed Modifications are located along a slope between the railroad/trolley tracks to the east, residential properties and roadway along Hill Street and East Beyer Boulevard to the west, East Beyer Boulevard on the north, and the main entrance to San Ysidro Freight Rail Yard on the south. Figure 1, *Regional Location*, and Figure 2, *Project Location*, show the regional and site-specific location of the Approved Project and Proposed Modifications and their spatial relation to one another.

The Proposed Modifications site is characterized by undeveloped terrain that slopes downward to the west and is partially covered with disturbed or non-native vegetation. The northern half of the site consists of imported gravel, highly disturbed soils, and vegetation. The southern half of the site consists of developed land with disturbed soils and scattered vegetation and weeds. Elevations range from approximately 85 to 105 feet above mean sea level. The site is located as close as approximately 200 feet east of Interstate 805 (I-805), approximately 0.4 mile north of the U.S. – Mexico border, and approximately five miles east of the Pacific Ocean. Surrounding land uses include railroad/trolley right-of-way, the San Ysidro Freight Rail Yard, and undeveloped land to the east, and residential and commercial developments to the west.

4. DESCRIPTION OF THE APPROVED PROJECT

The Approved Project, as described in the Final MND/IS entailed improvements at the San Ysidro Rail Yard (Rail Yard), including construction of two new track extensions and revisions to track alignment for additional rail car storage, a new truck access road, and drainage improvements. These components are briefly described below.

4.1 Rail Yard Improvements

The Approved Project included two new track extensions to the north to provide additional storage capacity, as well as the ability to switch rail cars outside of the constrained operating windows without interrupting the trolley line. The improved truck access to the Rail Yard provides additional opportunities for cargo transfer (transloading) and eliminates some regional truck traffic trips on freeways in the region. Truck access to the Rail Yard is provided from East Beyer Boulevard via a new one-way, entrance-only driveway that connects to an internal access road that parallels the railroad tracks to the east. Trucks exit the Rail Yard utilizing the existing driveway off East Beyer Boulevard, north of East San Ysidro Boulevard. Other improvements, such lighting and fencing, were installed for improved safety and security.

4.2 Drainage Improvements

The Approved Project included drainage improvements to alleviate flooding and siltation that occurred at the Rail Yard. Because of the Rail Yard's adjacency to steeper topography of the undeveloped hillsides to the east, it is subject to inundation by water and silt during storm events. The Approved Project corrected the drainage deficiencies by constructing storm drain facilities to accommodate flows during storm events, including detention and desiltation basins, grated catch basins, drainage ditches and storm drain pipelines.

4.3 Construction

Construction of these Approved Project components was completed in fall 2016.

5. DESCRIPTION OF THE PROPOSED MODIFICATIONS

The Proposed Modifications, which are the subject of and evaluated in this Addendum, include additional slope and drainage improvements, as well as retaining walls to provide increased slope support for the MTS Blue Line trolley tracks and to minimize slope drainage onto adjacent residential properties. In addition, a new access road is also proposed to provide for maintenance of existing and

proposed new drainage facilities. Figures 3a through 3c, *Proposed Modifications*, show the design plans of the improvements of the Proposed Modifications.

5.1 Slope Improvements

Proposed slope improvements entail the grading of a portion of the slope between the railroad/trolley tracks to the east and residential properties and roadway along Hill Street and East Beyer Boulevard to the west. An approximately three-acre area of the slope would be cleared and graded to create a 2:1 slope.

A total of four retaining walls are also proposed in areas where space is restricted to allow for 2:1 slopes:

- Retaining wall 1A: 82.5-foot long concrete gravity block wall between wall stations 400+00 and 400+82.5
- Retaining wall 1B: 85-foot long cast in drilled hole (CIDH) soldier pile wall between wall stations 400+82.5 and 401+67.48. This wall would include 12 steel soldier piles with concrete panel lagging.
- Retaining wall 2: 84-foot long cast-in-place gravity wall between wall stations 500+00 and 500+83.82.
- Retaining wall 3: 465-foot long concrete gravity block wall between wall stations 600+00 and 604+50.

5.2 Drainage Improvements

Proposed drainage improvements include a series of concrete drainage ditches and swales to collect and convey slope drainage into the connected municipal storm drain system. Under existing conditions, slope drainage causes flooding of the adjacent residential properties during storm events and increases the risk of undermining the tracks on top of the slope. Drainage ditches would generally be constructed on the slope behind the top of proposed retaining walls, and drainage swales would generally be constructed at the base of proposed retaining walls. These ditches and swales would lead to inlets, down drains, and storm drain pipelines and connect to existing drainage facilities.

5.3 Access Road

An approximately 500-foot long new maintenance access road would be constructed at the northern end of the site that would extend from the existing gated access road off East Beyer Boulevard. The new access road would be nine feet wide except for the southern portion where it terminates and widens to accommodate vehicle turnaround. The access road would be surfaced with an aggregate base on a compacted subgrade.

5.4 Right-of-way Encroachment

In addition to the slope and drainage improvements and new access road, the Proposed Modifications also include minor demolition activities within areas of the existing rail ROW where encroachments associated with abutting residential properties have occurred. Some residential properties along Hill Street and East Beyer Boulevard have constructed fences, retaining walls, patios, and other improvements in the back yards that encroach into the rail ROW. Existing elements that extend into the ROW would be removed if they would conflict with the Proposed Modifications.

5.5 Construction

It is anticipated that construction of the Proposed Modifications would be completed in an approximately eight-month time period.

6. ENVIRONMENTAL ANALYSIS

This section evaluates the environmental effects of the Proposed Modifications relative to the environmental issue areas that were previously examined in the Final MND/IS, as well as additional issue areas contained in CEQA Guidelines Appendix G. Energy, Tribal Cultural Resources, and Wildfire were added as new topical areas in CEQA Guidelines Appendix G of the CEQA Guidelines after approval of the Final MND/IS. These CEQA topics are also addressed in this section. For each CEQA topic, the conclusions of the Final MND/IS are briefly summarized followed by a discussion of the environmental effects resulting from the Proposed Modifications. The analysis evaluates whether the Proposed Modifications would result in any new significant environmental effects or a substantial increase in the severity of previously identified environmental effects.

6.1 Aesthetics

6.1.1 Scenic Vistas

The Final MND/IS concluded that no impacts to scenic vistas would occur resulting from the Approved Project. The Rail Yard is located at the eastern edge of the developed San Ysidro community with urbanized commercial and residential development to the west. Although the area to the immediate east is undeveloped land, no designated scenic vistas or resources occur in the project area. Additionally, the Approved Project did not involve construction of any new structures at a bulk or scale that would obstruct existing views to off-site scenic visual elements.

The site of the Proposed Modifications currently consists of developed land, gravel, and generally disturbed vegetation with some debris scattered throughout. As with the Approved Project, the Proposed Modifications would not impact any designated scenic vistas or resources. Proposed grading of the slope, installation of drainage improvements, and construction of the new access road would primarily consist of surface improvements and would not block views of off-site scenic visual elements from public vantagepoints. The Proposed Modifications would include the construction of retaining walls; however, there are no designated scenic views or vistas in the surrounding area that could potentially be obstructed by the proposed retaining walls. Therefore, impacts to scenic vistas would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for scenic vistas identified in the Final MND/IS.

6.1.2 Scenic Resources within a State Scenic Highway

The Final MND/IS concluded that the Approved Project would not result in impacts to scenic resources within a state scenic highway. The project site is located near I-5 and I-805; however, neither of these freeways in this location is designated a state scenic highway. As stated above, no designated scenic resources occur in the project area. Construction of the Approved Project occurred mostly within the railroad ROW, which also does not contain scenic resources.

The Proposed Modifications would occur within the railroad ROW that is characterized by developed land and generally disturbed vegetation. No trees, rock outcroppings, historic buildings, or other scenic

resources are present. As with the Approved Project, this area is not located near any designated state scenic highway. Therefore, no impacts to scenic resources within a State Scenic Highway would occur, and the Proposed Modifications are consistent with the impact conclusions for scenic resources identified in the Final MND/IS.

6.1.3 Visual Character and Quality

The Final/IS concluded no impacts to visual character and quality would occur as a result of the Approved Project. Components of the Approved Project included expansion of rail-related facilities at the existing Rail Yard, which is mostly developed and within the railroad ROW. The construction of additional rail facilities would not result in a substantial change to the visual character or quality of the site and surrounding area.

The northern half of the Proposed Modifications site consists of imported gravel, disturbed soils, and some low-lying vegetation. The southern half of the site consists of highly developed land with disturbed soils and scattered vegetation and weeds. There is also trash and debris scattered throughout the site of the Proposed Modifications. Components of the Proposed Modifications would include slope and drainage improvements, retaining walls, and an on-site maintenance access road. The construction of these features would primarily consist of surface improvements that would not introduce new and/or prominent visual elements. They would be visually consistent with existing surrounding elements both in terms of form and scale. As a result, the Proposed Modifications would not substantially change or degrade the existing visual character of quality of the site or surrounding area. Therefore, no impacts to visual character and quality would occur, and the Proposed Modifications are consistent with the impact conclusions for visual character and quality identified in the Final MND/IS.

6.1.4 Light and Glare

The Final MND/IS concluded that the Approved Project would result in less than significant impacts associated with new sources of light or glare. Most of the site evaluated in the Final MND/IS is developed with railroad facilities, with lighting already present at the Rail Yard. The lighting installed as part of the Approved Project is directional to minimize spillover onto surrounding areas. Additionally, the Approved Project components that were constructed did not include any large reflective surfaces that could cause glare effects either on site or at off-site locations.

The Proposed Modifications consist of slope and drainage improvements, retaining walls, and a maintenance access road. These improvements do not entail the addition of new permanent sources of light or glare. No additional permanent lighting is proposed, and no nighttime construction activities are planned. Additionally, no structures or other features with highly reflective surfaces are proposed that could create glare effects. Therefore, consistent with the impact conclusions for light and glare identified in the Final MND/IS, light and glare impacts resulting from the Proposed Modifications would be less than significant.

6.1.5 Conclusion

The Proposed Modifications would not alter the conclusions of aesthetics impacts identified in the Final MND/IS. No new potentially significant or substantially increased aesthetics impacts would occur as a result of the Proposed Modifications.

6.2 Agriculture and Forestry Resources

The Final MND/IS determined that the Approved Project would not impact agriculture and forestry resources because no agriculture resources, farmland, or forest land exist within the project vicinity. The Proposed Modifications are located within the same area that was evaluated in the Final MND/IS and no agriculture and forestry uses have been established in the area since adoption of the Final MND/IS. Therefore, no impacts to agriculture and forestry resources would occur, and the Proposed Modifications are consistent with the impact conclusions for agriculture and forestry resources identified in the Final MND/IS.

6.3 Air Quality

6.3.1 Air Quality Plan Consistency

The Final MND/IS concluded that no impacts to consistency with air quality plans would occur resulting from the Approved Project. As described in the Final MND/IS, projects that are consistent with applicable general plan(s) would therefore be consistent with the State Implementation Plan (SIP) and Regional Air Quality Standards (RAQS). Additionally, transportation projects that are listed in the Regional Transportation Plan (RTP) would have their emissions consistent with the SIP and RAQS. The Approved Project was listed in applicable RTP (2030 San Diego RTP) and thus, was consistent with the RAQS and SIP.

The RAQS was the applicable air quality plan for San Diego at the time the Final MND/IS was adopted. The RAQS has since been superseded by the San Diego Air Pollution Control District's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan). The Attainment Plan relies on information from the California Air Resources Board (CARB) and SANDAG, including projected growth in the County, mobile, area, and all other source emissions in order to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans would be consistent with the Attainment Plan. Because the Proposed Modifications would not generate population growth beyond the levels assumed for the region, they would not conflict with any population projections for the region and would, therefore, be consistent with the Attainment Plan and SIP. Furthermore, the Proposed Modifications are included in the 2021 Regional Transportation Improvement Program (RTIP) as components of MPO ID SAN 27 (San Ysidro Intermodal Freight Facility/South Line Rail on page 74 of the 2021 RTIP).

In addition, as discussed below, the Proposed Modifications would not result in any new significant air quality impact with regards to emissions of ozone precursors or criteria air pollutants. Therefore, the Proposed Modifications would not conflict with or obstruct implementation of the Attainment Plan or SIP, and are consistent with the impact conclusions for air quality plan consistency identified in the Final MND/IS.

6.3.2 Air Quality Standards

As described in the Final MND/IS, the Approved Project would generate emissions of criteria air pollutants (carbon monoxide [CO], sulfur dioxide [SO_2], nitrogen dioxide [NO_2], ozone [O_3], particulate matter of less than 10 microns in size [PM_{10}], particulate matter of less than 2.5 microns in size [$PM_{2.5}$],

and lead [Pb]) during construction and operation but would not exceed applicable air quality standards. Thus, air quality impacts resulting from the Approved Project were assessed as less than significant.

The Proposed Modifications include slope and drainage improvements, retaining walls, and an access road. These components would generate minimal emissions during construction compared to the Approved Project and would occur on a site that is entirely within the boundaries of the Approved Project. Once constructed, these improvements would not generate operational emissions except for the infrequent operation of maintenance vehicles along the new access road. Such emissions would be negligible. Because the Proposed Modifications would generate less emissions than the Approved Project, which was determined to have less than significant emission impacts during construction and operation, associated air quality impacts resulting from the Proposed Modifications would also be less than significant. Therefore, the Proposed Modifications are consistent with the impact conclusions for air quality standards identified in the Final MND/IS.

6.3.3 Sensitive Receptors

The Final MND/IS concluded that air quality impacts related to sensitive receptors resulting from the Approved Project would be less than significant. This determination was based on a Health Risk Assessment that analyzed concentrations of toxic air contaminants (TACs), including diesel particulate matter from project-related truck trips at nearby sensitive receptors.

The Proposed Modifications would occur within the area analyzed in the Final MND/IS and thus, the sensitive receptors previously considered would be the same. There are no new sensitive receptors in the vicinity. Construction of the Proposed Modifications would generate TAC emissions from construction equipment, albeit emissions are expected to be less than those generated by the Approved Project given the smaller construction area and extent of construction activities. Additionally, TAC emissions during construction would be temporary and once construction is completed, the Proposed Modifications would not generate TAC emissions. As with the Approved Project, the Proposed Modifications would not occur at a magnitude to generate substantial amounts of TACs. Therefore, the Proposed Modifications would not expose sensitive receptors to substantial pollutant concentrations, and associated air quality impacts would be less than significant. The Proposed Modifications are therefore consistent with the impact conclusions for sensitive receptors identified in the Final MND/IS.

6.3.4 Odors

The Final MND/IS concluded that the potential for adverse odor impacts associated with the Approved Project would be less than significant. It was noted that construction and operation could result in minor amounts of odor compounds associated with diesel emissions. Prevailing winds in the area are from the west which would tend to transport odors from the site away from receptors (including residents, school children and staff, and commercial patrons and employees) located to the west.

Construction of the Proposed Modifications would generate similar odors from construction equipment and would be temporary and periodic. The Proposed Modifications are located in the same area analyzed in the Final MND/IS and thus, these temporary construction-related odors would generally be transported away from sensitive receptors to the west. Following construction, the Proposed Modifications may generate negligible odors associated with vehicles along the access road, but no odors would be generated that would affect surrounding land uses. As such, air quality impacts resulting from the Proposed Modifications related to odors would be less than significant. The

Proposed Modifications are therefore consistent with the impact conclusions for odors identified in the Final MND/IS.

6.3.5 Conclusion

The Proposed Modifications would not alter the conclusions of air quality impacts identified in the Final MND/IS. No new potentially significant or substantially increased air quality impacts would occur as a result of the Proposed Modifications.

6.4 Biological Resources

A Biological Resources Memorandum was prepared in support of this Addendum to analyze the potential impacts to biological resources resulting from the Proposed Modifications (HELIX 2020a; Appendix A). A general biological survey of the site of the Proposed Modifications was conducted in December 2020, along with a review of previous maps, databases, and literature pertaining to biological resources known to occur in the project vicinity. In addition, a query of sensitive species and habitat databases was conducted, including the U.S. Fish and Wildlife (USFWS) species records, California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) Electronic Inventory. It should be noted that the site of the Proposed Modifications occurs within the Biological Study Area (BSA) that was evaluated for the Approved Project. Figure 4, *Biological Resources*, shows mapped vegetation communities and observed sensitive species within the Proposed Modifications site.

6.4.1 Special Status Plant and Animal Species

As discussed in the Final MND/IS, five sensitive animal species and nine sensitive plant species were observed in the BSA for the Approved Project, as identified in Table 1 below. The Approved Project resulted in impacts to these species, which were considered potentially significant impacts. Mitigation was identified in the Final MND/IS and was implemented to reduce impacts to special status plant and animal species to below a level of significance.

Table 1
SENSITIVE ANIMAL AND PLANT SPECIES OBSERVED WITHIN BSA – APPROVED PROJECT

Species	Status	Description	Impacts
Animal Species			
Coastal California gnatcatcher (*Polioptila californica californica*)	FE/SSC	Observed within and adjacent to BSA during surveys	Direct impacts to occupied habitat
San Diego fairy shrimp (*Branchinecta sandiegonensis*)	FT	Observed within 2 unvegetated basins within BSA during surveys.	Direct impacts to 2 occupied unvegetated basins
Orange-throated whiptail (*Aspidoscelis hyperythra*)	SSC	3 individuals observed during surveys.	Direct impacts to occupied habitat
Cooper's hawk (*Accipiter cooperii*)	CDFG Watch List	Observed flying over BSA during surveys.	Direct impacts to suitable habitat
San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)	SSC	Observed within BSA during surveys.	Direct impacts to occupied habitat
Plant Species			
Snake cholla (*Cylindropuntia californica var. californica*)	CNPS List 1b.1	Observed 14 individual plants within BSA	14 plants
Pacific saltbush (*Atriplex pacifica*)	CNPS List 1b.2	Observed 14 individual plants within BSA	14 plants
Spinebush (*Adolphia californica*)	CNPS List 2.1	Observed 18 individual plants within BSA.	4 plants
San Diego bur-sage (*Ambrosia chenopodiifolia*)	CNPS List 2.1	Observed 1,100 individual plants within BSA.	630 plants
San Diego barrel cactus (*Ferocactus viridescens*)	CNPS List 2.1	Observed 2 individual plants within BSA.	1 plant
Cliff spurge (*Euphorbia misera*)	CNPS List 2.2	Observed 20 individual plants within BSA.	18 plants
California box thorn (*Lycium californicum*)	CNPS List 4.2	Observed 54 individual plants within BSA.	35 plants
San Diego County viguiera (*Viguiera laciniata*)	CNPS List 4.2	Observed 202 individual plants within BSA	123 plants
Orcutt's bird's beak (*Cordylanthus orcuttianus*)	CNPS List 2.1	Observed 2 individual plants within BSA.	1 plant

FE = federally listed endangered; FT = federally listed threatened; SSC = State species of special concern; CNPS = California Native Plant Society
CNPS List 1b.1 = rare, threatened, or endangered in California and elsewhere - seriously endangered in California
CNPS List 1b.2 = rare, threatened or endangered in California but more common elsewhere - fairly endangered in California
CNPS List 2.1 = rare, threatened or endangered in California but more common elsewhere – seriously endangered in California
CNPS List 2.2 = rare, threatened or endangered in California but more common elsewhere – fairly endangered in California
CNPS List 4.2 = a watch list for species of limited distribution - fairly endangered in California

None of the previously identified or additional special status animal species were observed or detected within the Proposed Modifications site during the 2020 biological survey. Habitat suitable for listed species, including quino checkerspot butterfly, San Diego fairy shrimp, coastal California gnatcatcher, or burrowing owl was not observed within the Proposed Modifications site. Habitat that the orange-throated whiptail, Cooper's hawk, and San Diego black-tailed jackrabbit inhabit (non-native grassland) is present in the Proposed Modifications site; however, these species were not previously or currently observed in this specific area and thus, are not expected to be present. No impacts to these species are anticipated.

Suitable nesting habitat is present for several common bird species that are protected under the Migratory Bird Treaty Act (MBTA), including stands of coastal cholla (*Cylindropuntia prolifera*) that may be suitable for coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; federal bird of conservation concern, state species of special concern). Therefore, as with the Approved Project, the Proposed Modifications may result in potentially significant impacts to nesting birds protected under the MBTA. These potentially significant impacts would be mitigated to less than significant levels with the implementation of mitigation measure BIO-6 from the Final MND/IS, which is listed below. This measure has been slightly modified to include nesting birds in addition to raptors; revisions are shown in strikeout/underline format. The changes are minor clarifications and do not affect the impact conclusions in the Final MND/IS, nor do they constitute a new significant impact or a substantial increase in the severity of a previously identified impact.

> **BIO-6** Clearing and grubbing shall occur outside the bird breeding season ~~of raptors~~ (breeding season is February 15 to August 31) to avoid breeding birds. If vegetation clearing and grubbing occur during the ~~raptor~~ breeding season, pre-construction nesting ~~raptor~~ surveys shall be conducted to determine presence or absence of nesting ~~raptors~~ birds. If nesting ~~raptors~~ birds are discovered within 500 feet of proposed construction activities, such activities shall be halted until the young have fledged.

Two of the previously identified special status plant species were observed within the Proposed Modifications site during the December 2020 biological survey: San Diego bur-sage (California Rare Plant Rank [CRPR] 2B.1) and California box-thorn (CRPR 4.2). CRPR list 2 species are considered rare, threatened, or endangered in California but more common elsewhere. CRPR list 4 species are considered watch list species. Both San Diego bur-sage and California box-thorn are not afforded special status or recognition by the USFWS, CDFW, or the City of San Diego. Within the site, two individuals of San Diego bur-sage occur within non-native grassland in the northern portion of the site, and four individuals of California box-thorn occur within non-native grassland in the northern portion of the site. As with the Approved Project, the Proposed Modifications would result in potentially significant impacts to these sensitive plant species. However, impacts would be mitigated to less than significant levels with the implementation of mitigation measures BIO-4 and BIO-7 from the Final MND/IS, which are listed below.

> **BIO-4** Prior to construction, individual sensitive plant species that would be impacted by the project shall be salvaged and replanted at off-site mitigation areas, where practicable.

> **BIO-7** All sensitive habitats outside the proposed impact area shall be designated as Environmentally Sensitive Areas (ESAs). These ESAs shall be fenced with orange plastic exclusionary fencing and no personnel, debris, or equipment shall be allowed within the ESAs. The ESAs shall be monitored during construction activities.

Based on the above analysis, the Proposed Modifications are consistent with the impact conclusions for special status species identified in the Final MND/IS. No new potentially significant or substantially increased impacts to special status species would occur as a result of the Proposed Modifications.

6.4.2 Sensitive Vegetation Communities

As discussed in the Final MND/IS, the Approved Project BSA contained developed land, unvegetated basins, and the following five vegetation communities: mule fat scrub, maritime succulent scrub (including disturbed), saltbush scrub, non-native grassland (including disturbed), and disturbed habitat. Of these, mule fat scrub, maritime succulent scrub (including disturbed), saltbush scrub, and non-native grassland (including disturbed) are considered sensitive vegetation communities. The Approved Project resulted in impacts to these sensitive vegetation communities, which were assessed as potentially significant impacts. Mitigation was identified in the Final MND/IS and was implemented to reduce impacts to sensitive vegetation communities to below a level of significance.

Three vegetation communities/land use types occur within the Proposed Modifications site, including non-native grassland, disturbed habitat, and developed lands. The site provides mainly low-quality habitat due to previous and ongoing disturbance associated with railroad operations; steep erosive slopes; extensive non-native vegetation; and constrained location between urban development and the railroad tracks. The Proposed Modifications would impact 1.2 acres of non-native grassland, 1.6 acres of disturbed habitat, and 0.8 acre of developed land. Of these, only non-native grassland is considered a sensitive vegetation community. Therefore, as with the Approved Project, implementation of the Proposed Modifications would result in significant impacts to sensitive vegetation communities, including non-native grassland. These potentially significant impacts would be mitigated to less than significant levels with the implementation of mitigation measure BIO-5a. The Final MND/IS identified Mitigation Measure BIO-5, which addressed compensatory mitigation for impacts to non-native grassland resulting from the Approved Project. Mitigation Measure BIO-5 was implemented prior to construction of the Approved Project. Mitigation Measure 5a, which is listed below, is specific to the Proposed Modifications and addresses the additional impacts to non-native grassland resulting from the Proposed Modifications.

> **BIO-5a** Impacts to 1.2 acres of non-native grassland shall be mitigated at a 0.5:1 ratio through acquisition of 0.6 acre of suitable upland habitat within the Otay Mesa Parcel A mitigation site.

While this is a new mitigation measure, it does not represent a new significant impact or substantial increase in the severity of a previously identified impact. The Final MND/IS identified similar impacts (albeit greater at 5.0 acres) to non-native grassland and included mitigation that was implemented to mitigate impacts to non-native grassland. The additional impact of 1.2 acres of low-quality non-native grassland does not constitute a substantial increase in the severity of previously identified impacts to this sensitive vegetation community. As such, the Proposed Modifications are consistent with the impact conclusions for sensitive vegetation communities identified in the Final MND/IS. No new potentially significant or substantially increased impacts to sensitive vegetation communities would occur as a result of the Proposed Modifications.

6.4.3 Wetlands

As identified in the Final MND/IS, the Approved Project BSA contained wetlands and waters under the jurisdiction of the U.S. Army Corps of Engineers (USACE), California Department of Fish and Wildlife

(CDFW), and Regional Water Quality Control Board (RWQCB). Implementation of the Approved Project resulted in potentially significant impacts to jurisdictional wetlands and waters. Compensatory mitigation was implemented as part of regulatory permits that were obtained for the Approved Project, including a federal Clean Water Act Section 404 Permit from the USACE, a Section 401 Water Quality Certification from the RWQCB, and a 1602 Streambed Alteration Agreement from the CDFW.

Based on the 2020 biological survey, the Proposed Modifications site does not contain jurisdictional wetlands and waters. A storm drain inlet was observed, but this feature is not a jurisdictional resource. Therefore, implementation of the Proposed Modifications would not result in any direct or indirect impacts to state or federally protected wetlands. No new or substantially increased impacts to jurisdictional wetlands and waters would occur.

6.4.4 Wildlife Movement and Migratory Species

The Final MND/IS concluded that no impacts to wildlife movement or migratory species would occur as a result of the Approved Project. The Approved Project BSA was described as within a developed setting and although a large area of undeveloped land occurs to the east of the Rail Yard, the immediate setting includes railroad tracks and associated infrastructure, residential uses and freeways to the west, development to the north, and the border fence to the south. As a result, the Approved Project BSA is not anticipated to support wildlife corridors.

The Proposed Modifications site is located entirely within the boundaries of the original BSA and therefore is not anticipated to support viable wildlife corridors as well. Further, the 2020 biological survey completed for the Proposed Modifications found that the site is highly disturbed by rail operations and rail ROW maintenance. As such, the Proposed Modifications site is not suitable to serve as a wildlife corridor. No impacts would occur, and the Proposed Modifications are therefore consistent with the impact for wildlife movement and migratory species identified in the Final MND/IS.

6.4.5 Local Policies and Ordinances

The Final MND/IS concluded that no impacts to local policies and ordinances protecting biological resources would occur as a result of the Approved Project. Applicable policies and ordinances include the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan, and the Final MND/IS determined that the Approved Project would not conflict with the conservation goals of the MSCP.

Similarly, the Proposed Modifications would not conflict with local policies or ordinances protecting biological resources, including the City of San Diego's MSCP Subarea Plan. The Proposed Modifications site is not located within or adjacent to the Multi-Habitat Planning Area (MHPA), which is the City's preserve area, and thus the Proposed Modifications would not result in any direct or indirect impacts on the MHPA. No impacts related consistency with local policies and ordinances would occur. The Proposed Modifications are therefore consistent with the impact conclusions for local polices and ordinances protecting biological resources identified in the Final MND/IS.

6.4.6 Habitat Conservation Plans

The Final MND/IS concluded that impacts to adopted habitat conservation plans resulting from the Approved Project would be potentially significant. A small portion of the Approved Project BSA occurs within the MHPA and while no permanent impacts to MHPA lands occurred as a result of the Approved

Project, potentially significant indirect impacts related to noise on sensitive species and non-native plant colonization were assessed and mitigation was identified in the Final MND/IS that was implemented during construction of the Approved Project.

As noted above under Local Policies and Ordinances, the Proposed Modifications site is not located within or adjacent to MHPA lands and thus no direct or indirect impacts to the MHPA would occur. No new or substantially increased impacts to habitat conservation plans would occur.

6.4.7 Conclusion

The Proposed Modifications would not alter the conclusions of biological resources impacts identified in the Final MND/IS related to sensitive status plant and animal species, wildlife movement and migratory species, and local policies and ordinances. While the Proposed Modifications would increase the amount of impacts to non-native grassland, the additional impacts would not be a new impact because impacts to non-native grassland were previously identified in the Final MND/IS. The additional impacts also would not be considered a substantial increase in the severity of impacts to this resource that was identified in the Final MND/IS. Consequently, no new potentially significant or substantially increased impacts to sensitive vegetation communities would occur as a result of the Proposed Modifications. Impacts associated with wetlands were assessed as potentially significant in the Final MND/IS; however, implementation of the Proposed Modifications would not result in impacts to wetlands because none occur in the Proposed Modifications site. Impacts associated with habitat conservation plans were also assessed as potentially significant in the Final MND/IS, but implementation of the Proposed Modifications would not result in impacts to habitat conservation plans because no MHPA lands occur within or adjacent to the Proposed Modifications site. No new potentially significant or substantially increased impacts to biological resources would occur as a result of the Proposed Modifications.

6.5 Cultural Resources

A Cultural Resources Memorandum was prepared in support of this Addendum to analyze the potential impacts to cultural resources resulting from the Proposed Modifications (HELIX 2020b; Appendix B). A field survey of the Area of Potential Effect (APE) for the Proposed Modifications was conducted in December 2020 to identify previously recorded resources and to determine if additional resources are present. The APE for the Proposed Modifications occurs within the APE that was evaluated for the Approved Project.

6.5.1 Historic Resources

As identified in the Final MND/IS, one historic site was identified during the records search and one additional historic site was identified during the field survey completed for the Approved Project. The previously recorded historic site (P-37-025680) included the SD&AE railroad line, and the Final MND/IS concluded that impacts to this resource were potentially significant. Mitigation was identified in the Final MND/IS and implemented as part of the Approved Project. The additional historic resource (SDI-19751/P-37-031175) consisted of the remains of a cattle pen and feed lot associated with a San Ysidro cattle ranch generally between the early 1900s and 1960s. Impacts to this resource resulting from implementation of the Approved Project were assessed as less than significant.

While the delineated boundary for the SD&AE railroad line (historic site P-37-025680) extends into the APE for the Proposed Modifications, the tracks occur on the top of the slope to the east and are not

within the APE. The Proposed Modifications would not impact the tracks and thus, no impacts to this previously recorded historic site would occur as a result of the Proposed Modifications. The other previously recorded historic site (SDI-19751/P-37-031175) is located outside of the APE for the Proposed Modifications and would not be impacted. No additional historic resources were identified during the field survey. The Proposed Modifications therefore would not result in new or substantially increased impacts to historic resources.

6.5.2 Archaeological Resources

As identified in the Final MND/IS, two prehistoric archaeological resources were identified during the records search and two additional prehistoric archaeological resources were identified during the field survey completed for the Approved Project. These resources consisted of lithic scatter and/or isolates, and the Final MND/IS concluded impacts to these resources due to the Approved Project were less than significant.

Three of the four previously identified archaeological resources are located outside of the APE for the Proposed Modifications. The boundary for one resource extends into a small portion of the southern end of the APE, but none of the recorded artifacts associated with the resource are located in the APE. Even so, impacts to this resource were assessed as less than significant and thus, if additional artifacts of this resources are unearthed during construction of the Proposed Modifications, impacts to them would be less than significant. Furthermore, no additional archaeological resources were identified during the field survey. The Proposed Modifications therefore would not result in new or substantially increased impacts to archaeological resources.

6.5.3 Paleontological Resources

The Final MND/IS concluded that impacts to paleontological resources were potentially significant based on the resource sensitivity of underlying formation materials on portions of the Approved Project site. Mitigation was identified in the Final MND/IS and was implemented during construction of the Approved Project.

The Proposed Modifications would occur in mostly developed or disturbed areas. As with the Approved Project, there is potential to encounter unknown paleontological resources during ground disturbing activities for the Proposed Modifications due to the presence of terrace deposits underlying portions of the site, which exhibit moderate potential for paleontological resources. As with the Approved Project, the Proposed Modifications would result in potentially significant impacts to paleontological resources. This impact would be mitigated to less than significant levels with the implementation of mitigation measure PAL-1 from the Final MND/IS, which is listed below.

> **PAL-1** Prior to and during construction, a paleontological monitoring plan shall be prepared and implemented and shall include the following:
>
> - A qualified paleontologist shall attend a pre-construction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology, who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of San Diego County, and who has worked as a paleontological mitigation project supervisor in the County for at least one year.

- A paleontological monitor shall be on site on a full-time basis during the original cutting of previously undisturbed deposits with high or moderate paleontological resource potential (i.e., the Otay formation and terrace deposits) to inspect exposures for contained fossils. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor shall work under the direction of the qualified paleontologist. As grading progresses, the qualified paleontologist and paleontological monitor shall have the authority to reduce the scope of the monitoring program to an appropriate level if it is determined that the potential for impacts to paleontological resources is lower than anticipated.

- If fossils are discovered, the paleontologist (or paleontological monitor) shall recover them. In most cases, this fossil salvage can be completed in a short period of time, although if necessary the paleontologist (or paleontological monitor) shall be allowed to briefly redirect, divert, or halt grading. Certain fossil specimens, however (e.g., a complete large mammal skeleton), may require an extended salvage period. In these instances, the paleontologist (or paleontological monitor) shall be allowed to redirect, divert, or halt grading to allow recovery of fossil remains in a timely manner.

- Fossil remains collected during monitoring and salvage shall be cleaned (removal of extraneous enclosing sedimentary rock material), repaired (consolidation of fragile fossils and gluing together of broken pieces), sorted (separating fossils of different species), and cataloged (scientific identification of species, assignment of inventory tracking numbers, and recording of these numbers in a computerized collection database). Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in an accredited scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum.

- A final summary report shall be prepared that outlines the results of the monitoring program.

Therefore, the Proposed Modifications are consistent with the impact conclusions for paleontological resources identified in the Final MND/IS. No new potentially significant or substantially increased impacts to paleontological resources would occur as a result of the Proposed Modifications.

6.5.4 Human Remains

The Final MND/IS concluded that no impacts to human remains would occur as a result of the Approved Project. The site is not located within or near a formal cemetery and is not known to be located on a burial ground. Given the mostly developed setting of the project site, the potential to encounter human remains was assessed as extremely low.

The Proposed Modifications occur within the site of the Approved Project that was evaluated in the Final MND/IS. As with the Approved Project, the site of the Proposed Modifications is mostly developed and/or disturbed and is not located within or near a formal cemetery or known to be located on a burial ground. No impacts to human remains would occur, and the Proposed Modifications are consistent with the impact conclusions for disturbance of human remains identified in the Final

MND/IS. No new potentially significant or substantially increased impacts to disturbance of human remains would occur as a result of the Proposed Modifications.

6.5.5 Conclusion

The Proposed Modifications would not alter the conclusions of cultural resources impacts identified in the Final MND/IS related to paleontological resources and human remains. Impacts associated with historic and archaeological resources were assessed as potentially significant in the Final MND/IS; however, implementation of the Proposed Modifications would not result in impacts to historic or archaeological resources because the identified resources would not be impacted. No new potentially significant or substantially increased cultural resources impacts would occur as a result of the Proposed Modifications.

6.6 Energy

The topic of Energy was added to the CEQA Guidelines Appendix G in 2019, and therefore was not addressed in the Final MND/IS that evaluated the Approved Project. As such, potential energy impacts due to the Proposed Modifications are addressed in this section.

6.6.1 Energy Consumption

The Proposed Modifications would not involve expansion of rail capacity or train operations, nor would it result in a permanent increase in population or employees at the site. The project involves slope and drainage improvements, retaining walls, and a maintenance access road. As is typical of any construction, the Proposed Modifications would temporarily consume energy for the operation of construction equipment and vehicles. During construction, standard methods of excavation, grading, and site development are planned. Construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. Additionally, the Proposed Modifications would not result in long-term energy consumption except for minimal fuel consumption associated with maintenance vehicles periodically utilizing the access road. Therefore, the Proposed Modifications would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

6.6.2 Renewable Energy or Energy Efficiency Plans

The Proposed Modifications do not conflict with any state or local plans for renewable energy efficiency. The Proposed Modifications would employ standard methods of construction and do not propose to create a condition post construction whereby increased energy demand would be created. Thus, no impacts would occur.

6.6.3 Conclusion

The Proposed Modifications would not result in significant impacts related to energy. Therefore, the Proposed Modifications would not result in new significant impacts.

6.7 Geology and Soils

6.7.1 Seismic Hazards

The Final MND/IS concluded that impacts related to seismic hazards, including earthquake fault rupture, strong seismic ground shaking, liquefaction, and landslides would be less than significant. The site is not located within an earthquake fault zone; no known active or potentially active faults traverse the site. The closest known active fault is the Rose Canyon fault, located approximately seven miles to the northwest. The potentially active La Nacion fault system is located just north of the Rail Yard. Based on the depth of groundwater (approximately 50 feet) and the relatively dense, cohesive nature of the underlying soils, the potential for liquefaction was assessed as negligible. The Final MND/IS also determined that slopes had an adequate factor of safety against landslide failure.

As with the Approved Project, the Proposed Modifications are not located within an Alquist-Priolo earthquake fault zone. Further, the Proposed Modifications do not include the construction of any structures that would introduce new inhabitants to the area such that people or structures would be exposed to potential adverse effects from fault rupture.

Therefore, impacts related to earthquake fault rupture would be less than significant, and the proposed Modifications are consistent with the impact conclusions for rupture of a known earthquake fault identified in the Final MND/IS.

Similar to the Approved Project, the Proposed Modifications are located within seismically active southern California and thus, may be subject to strong ground motion from seismic activity. However, the Proposed Modifications do not include construction of any habitable structures and therefore would not pose a significant risk to people associated with building failure or damage during a seismic event. In addition, the Proposed Modifications would be designed and constructed in compliance with required seismic design parameters. As such, impacts related to strong seismic ground shaking would be less than significant and the Proposed Modifications are consistent with the impacts conclusions for strong seismic ground shaking identified in the Final MND/IS.

Liquefaction effects are susceptible in areas characterized by loose, granular soils, with liquefaction generally restricted to saturated or near-saturated soils at depths of less than 100 feet. The site of the Proposed Modifications is located entirely within the boundaries of the Approved Project that was evaluated in the Final MND/IS. As discussed in the Final MND/IS, the site had relatively dense, cohesive soils and did not have groundwater depths shallower than 50 feet. Therefore, the site of the Proposed Modifications is not anticipated to experience adverse impacts related to liquefaction. Impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for liquefaction identified in the Final MND/IS.

Landslides occur as a type of geologic hazard resulting from slope failure. The site of the Proposed Modifications includes inadequate slope support for the trolley tracks and uncontrolled slope drainage, which could result in a higher risk for landslides at the site. However, the Proposed Modifications include implementation of slope and drainage improvements to provide more stable slope support and minimize slope drainage to adjacent residential properties. Proposed improvements include grading of the slope to create a 2:1 gradient, construction of retaining walls, drainage ditches and swales, and retaining walls. These project components would reduce hazards related to slope failure at the site, including landslides. Therefore, impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for landslides identified in the Final MND/IS.

6.7.2 Soil Erosion

The Final MND/IS concluded that impacts related to soil erosion and loss of topsoil as a result of the Approved Project would be less than significant. While it was noted that on-site soils were susceptible to erosion, topsoil and some fill materials were removed or treated (compacted or moisture conditioned) during construction of the Approved Project. Additionally, manufactured slopes were not steeper than a 2:1 gradient and some were hydroseeded to minimize erosion.

Soil exposed by construction activities, such as grading, could be subject to erosion if exposed to heavy rain, winds, or other storm events. However, a stormwater pollution prevention plan (SWPPP) would be prepared which would identify erosion control and sediment control best management practices (BMPs) that would be implemented to avoid or minimize the occurrence of soil erosion or loss of topsoil during construction of the Proposed Modifications. No long-term erosion effects would occur as the Proposed Modifications include slope and drainage improvements that would further minimize soil erosion at the site. Therefore, impacts from soil erosion would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for soil erosion identified in the Final MND/IS.

6.7.3 Unstable Geologic Units and Soil

The Final MND/IS concluded that impacts related to unstable geologic units or soils resulting from the Approved Project would be less than significant. The potential for liquefaction was determined to be negligible, and slopes were assessed as having an adequate factor of safety against failure. Additionally, topsoil and some fill materials were removed or treated during construction of the Approved Project.

The Proposed Modifications include slope and drainage improvements, as well as retaining walls. The slope and drainage improvements would result in greater soil stability at the site as they would provide for improved support for the rail tracks above the slope and would convey slope runoff into drainage facilities. Erosion control and sediment control BMPs would be implemented during construction activities to avoid or minimize erosion. As discussed earlier, the site of the Proposed Modifications is not anticipated to experience adverse impacts related to liquefaction. Therefore, impacts from unstable geologic units or soil would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for unstable geologic units and soil identified in the Final MND/IS.

6.7.4 Expansive Soil

The Final MND/IS concluded that impacts related expansive soils due to the Approved Project would be less than significant. Fill was generally used during construction of the Approved Project, which consisted of granular soils with a very low to low expansion potential.

The Proposed Modifications involve slope and drainage improvements at the site to improve slope support for the above rail track and to control slope drainage. These improvements would increase geologic stability at the site. Moreover, the Proposed Modifications are located entirely within the footprint of the Approved Project evaluated in the Final MND/IS, which was not determined to have significant impacts related to expansive soil. As stated in the Final MND/IS, imported fill materials would generally be granular soils with a very low to low expansion potential, so the Proposed Modifications would not introduce expansive soil to the site. Therefore, impacts from expansive soil

would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for expansive soil identified in the Final MND/IS.

6.7.5 Wastewater Disposal Systems

As described in the Final MND/IS, the Approved Project does not include wastewater disposal systems and no impacts were assessed. The Proposed Modifications also do not include wastewater disposal systems. Therefore, no impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for wastewater disposal systems identified in the Final MND/IS.

6.7.6 Conclusion

The Proposed Modifications would not alter the conclusions of geology and soils impacts identified in the Final MND/IS. No new or substantially increased impacts related to geology and soils would occur as a result of the Proposed Modifications.

6.8 Greenhouse Gas Emissions

6.8.1 Greenhouse Gas Emissions

The Final MND/IS concluded that impacts related to greenhouse gas (GHG) emissions resulting from construction and operation of the Approved Project were less than significant. GHG emissions were calculated for the construction phase and for operations at the Rail Yard, and the estimated emissions quantity did not exceed the screening threshold used to assess impacts.

Construction of the Proposed Modifications would generate GHG emissions during the construction period mainly from vehicle exhaust from construction equipment, hauling trucks, and worker commuting trips. The Proposed Modifications would be at a much smaller scale and would require less construction in terms of activities, intensity, and duration compared to the improvements constructed for the Approved Project. As such, the Proposed Modifications would generate less GHG emissions during construction than the Approved Project.

The Proposed Modifications consist of slope and drainage improvements, retaining walls, and a maintenance access road. Once constructed, these improvements would not generate operational emissions except for the infrequent operation of maintenance vehicles along the new access road. Such emissions would be negligible. Because the Proposed Modifications would generate less emissions than the Approved Project, which was determined to have less than significant impacts during construction and operation, associated GHG impacts resulting from the Proposed Modifications would also be less than significant. Therefore, the Proposed Modifications are consistent with the impact conclusions for GHG emissions identified in the Final MND/IS.

6.8.2 Greenhouse Gas Emissions Reduction Plan Consistency

The Final MND/IS concluded the Approved Project would be consistent with the goals of applicable plans, policies, and regulations to reduce GHG emissions, including Assembly Bill 32 (AB 32), low-carbon fuel standard (LCFS), and CARB Scoping Plan measures designed to reduce emissions. No impacts to GHG emissions reduction plan consistency were assessed for the Approved Project.

As discussed above, the Proposed Modifications would not generate substantial quantities of GHG emissions during construction and operation, and emissions would be less than the Approved Project. Therefore, as with the Approved Project, implementation of the Proposed Modifications would also be consistent with GHG emissions reduction plans. No impacts to GHG emissions reduction plans consistency would occur. Thus, the Proposed Modifications are consistent with the impact conclusions for GHG emissions reduction plan consistency identified in the Final MND/IS.

6.8.3 Conclusion

The Proposed Modifications would not alter the conclusions of GHG emissions impacts identified in the Final MND/IS. No new or substantially increased impacts related to GHG emissions would occur as a result of the Proposed Modifications.

6.9 Hazards and Hazardous Materials

6.9.1 Transport, Use, Disposal, or Release of Hazardous Materials

As discussed in the Final MND/IS, hazardous materials used to maintain and operate construction equipment were anticipated to be present during construction of the Approved Project, and operations of the Rail Yard following the construction of Approved Project improvements would include transport, storage, use, and disposal of hazardous materials (fuels, motor oil, and, lubricants). Significant hazards to the public or environment would not occur based on compliance with applicable laws and regulations. In addition, schools and other sensitive receptors are located within 0.25 mile, but the Approved Project would not emit hazardous emissions or handle acutely hazardous materials. Consequently, the Final MND/IS concluded that impacts related to the transport, use, disposal, or release of hazardous materials resulting from the Approved Project would be less than significant.

Hazardous materials would also be used during construction of the Proposed Modifications. The transport, use, and disposal of such hazardous materials would be conducted in accordance with applicable state and federal laws. Once constructed, the Proposed Modifications would not include any facilities that would use or generate hazardous materials or emit hazardous emissions. Therefore, as with the Approved Project, impacts related to the use, storage, transport, or release of hazardous materials resulting from the Proposed Modifications would be less than significant. Thus, the Proposed Modifications are consistent with the impact conclusions for transport, use, disposal, and release of hazardous materials identified in the Final MND/IS.

6.9.2 Listed Hazardous Materials Sites

As discussed in the Final MND/IS, the Approved Project site was listed in several regulatory databases as the site generates hazardous waste (i.e., waste oils and solvents) and has a reported case of diesel fuel release into the underlying soil and groundwater. Underground storage tanks (USTs) occur within the site and several USTs have been removed over time. Contaminated soil was identified on site within shallow soils under former USTs. The Final MND/IS concluded impacts associated with contaminated soils were potentially significant and mitigation identified in the Final MND/IS was implemented during construction of the Approved Project to reduce impacts to below a level of significance. Additionally, the Final MND/IS determined that hazardous building materials and other hazardous substances could potentially be present on site, including asbestos-containing materials (ACM), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). Potential sources of ACM and LBP were observed within existing buildings on site and potential sources of PCBs on site include electrical transformers, railroad

switching ties, and fluorescent light ballasts. Impacts were assessed as potentially significant and mitigation identified in the Final MND/IS was implemented during construction of the Approved Project to reduce impacts to below a level of significance.

The Proposed Modifications occur primarily on a slope between the railroad tracks and residential development and roadways. No listed hazardous materials sites or existing or former USTs occur in the footprint of the Proposed Modifications. Additionally, no structures or facilities are present that could contain hazardous building materials or other hazardous substances. As such, no impacts related to listed hazardous materials sites would occur. The Proposed Modifications therefore would not result in new or substantially increased impacts related to listed hazardous materials sites.

6.9.3 Airport Hazards

The Final MND/IS concluded no airport hazards impacts would occur resulting from implementation of the Approved Project. The site is not located within the Airport Influence Area (AIA) of any nearby public airport (i.e., Brown Field Municipal Airport) and no private aviation facilities are located in the general vicinity.

The Proposed Modifications are located within the footprint of the Approved Project that was evaluated in the Final MND/IS. Thus, as with the Approved Project, the site of the Proposed Modifications is not located within an AIA of a public airport and no private airstrips occur in the general vicinity. Therefore, no airport hazards impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for airport hazards identified in the Final MND/IS.

6.9.4 Emergency Response and Evacuation Plans

The Final MND/IS concluded that no hazards impacts related to emergency response and evacuation plans would occur as a result of the Approved Project because primary access to all major roads and emergency vehicle access would be maintained during construction of the Approved Project.

Similar to the Approved Project, the Proposed Modifications would not impair or physically interfere with an adopted emergency response or evacuation plan. Primary access to all major roads would be maintained during the construction period of the Proposed Modifications and construction activities would not interfere with access for emergency vehicles. Once constructed, the Proposed Modifications would have no impact on roadways, and therefore would not interfere with an emergency response or evacuation routes. The proposed access road would only be used by authorized vehicles for on-site maintenance. No impacts related to emergency response and evacuation plans would occur, and the Proposed Modifications are consistent with the impact conclusions for emergency response and evacuation plans identified in the Final MND/IS.

6.9.5 Wildland Fire Hazards

As discussed in the Final MND/IS, the Approved Project site occurs at the eastern edge of the developed San Ysidro community, with large areas of undeveloped land to the immediate east. The Final MND/IS determined that the Approved Project would not increase potential hazards associated with wildfires because improvements occur at the existing Rail Yard, which is served by existing public services, including fire protection. Because of the existing rail operations, dense vegetation and other fuel sources are not present. Hazard impacts related to wildland fires were therefore assessed as less than significant for the Approved Project.

The Proposed Modifications occur within the footprint of the Approved Project that was evaluated in the Final MND/IS. As with the Approved Project, the Proposed Modifications would not increase the potential for wildland fires to occur primarily because the Proposed Modifications site is located between the railroad tracks and residential development and roadways and not connected to large undeveloped areas. Most of the site is characterized by disturbed and developed land, but a swathe of low-lying grassland vegetation is also present. Implementation of the Proposed Modifications would clear this existing vegetation, which would reduce the potential for wildland fires to occur at the site. Therefore, impacts related to wildland fires would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for wildland fires identified in the Final MND/IS.

6.9.6 Conclusion

The Proposed Modifications would not alter the conclusions of hazards and hazardous materials impacts identified in the Final MND/IS related to transport, use, disposal, or release of hazardous materials; airport hazards; emergency response and emergency evacuation plans; and wildland fire hazards. Impacts associated with listed hazardous materials sites were assessed as potentially significant in the Final MND/IS; however, implementation of the Proposed Modifications would not result in impacts to listed hazardous materials sites. No new potentially significant or substantially increased hazards and hazardous materials impacts would occur as a result of the Proposed Modifications.

6.10 Hydrology and Water Quality

6.10.1 Water Quality Standards

The Final MND/IS concluded that impacts to water quality standards and waste discharge requirements resulting from the Approved Project would be less than significant. Conformance with applicable requirements and SWPPP implementation and BMPs would ensure that short-term, construction-related and long-term water quality violations would not occur.

Like the Approved Project, the Proposed Modifications would involve construction activities that could result in sediment discharge in stormwater runoff. In addition, construction would involve the use of oil, lubricants, and other chemicals that could be discharged from leaks or accidental spills. A SWPPP would be implemented during construction of the Proposed Modifications that would include water quality BMPs to ensure water quality standards are met. Once constructed, the slope and drainage improvements would not generate pollutants that could potentially affect water quality. Maintenance vehicles would use the new access road, but the frequency and number of vehicles would be nominal. As such, the access road would not generate substantial amounts of pollutants typically associated with vehicles (oils and other fluids) that could be transported to downstream receiving waters and adversely affect water quality. Therefore, impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for water quality standards identified in the Final MND/IS.

6.10.2 Groundwater Supplies

As discussed in the Final MND/IS, the Approved Project did not require the use of groundwater or substantially interfere with groundwater recharge. No impacts related to groundwater supplies were assessed for the Approved Project.

The Proposed Modifications also would not require the use of groundwater and would not substantially interfere with groundwater recharge. The Proposed Modifications entail slope and drainage improvements, retaining walls, and an access road. While some new impervious surfaces would be introduced with drainage ditches/swales, and retaining walls, most of the site of the Proposed Modifications would remain pervious such that water could continue to infiltrate the ground surface. Therefore, the Proposed Modifications would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for groundwater supplies identified in the Final MND/IS.

6.10.3 Drainage Pattern Alteration

The Final MND/IS concluded that the Approved Project would not substantially alter existing drainage patterns of the site or vicinity. The Approved Project included construction of desiltation and detention basins to reduce storm water runoff and sediment volumes such that erosion and/or flooding would not occur. Water quality impacts associated with drainage pattern alteration were assessed as less than significant for the Approved Project.

Implementation of the Proposed Modifications also would not substantially alter existing drainage patterns of the site or vicinity. The Proposed Modifications include slope and drainage improvements to better capture and convey existing slope drainage at the site of the Proposed Modifications. Under existing conditions, slope drainage causes flooding of the adjacent residential properties during storm events and increases the risk of undermining the tracks on top of the slope. As discussed in Section 5, proposed drainage improvements include a series of concrete drainage ditches and swales to collect and convey slope drainage into the connected municipal storm drain system. These new drainage facilities would improve conditions at the site related to erosion and flooding. Therefore, impacts related to drainage pattern alteration would be less than significant. The Proposed Modifications are consistent with the impact conclusions for drainage pattern alteration identified in the Final MND/IS.

6.10.4 Runoff

As discussed in the Final MND/IS, the Approved Project included the construction of desiltation and detention basins, drainage ditches, catch basins, and storm drain pipes to adequately collect and convey runoff at the site into the storm drain system. With these improvements, runoff collected at the site would not exceed the capacity of the storm drain system. As discussed above in Section 6.10.1, the Approved Project could result in polluted runoff; however, the potential for water quality impacts would be minimized through compliance with applicable regulatory requirements. Therefore, the Final MND/IS concluded that water quality impacts related to storm water capacity and polluted runoff resulting from the Approved Project would be less than significant.

As discussed above in Section 6.10.3, the Proposed Modifications include slope and drainage improvements to better capture and convey runoff at the site of the Proposed Modifications. Proposed drainage improvements include a series of concrete drainage ditches and swales to collect and convey runoff into the connected municipal storm drain system, and would result in improved conditions related to runoff. Additionally, a SWPPP would be implemented during construction, which would identify construction BMPs to control runoff during construction. Therefore, water quality impacts related to runoff resulting from the Proposed Modifications would be less than significant. The

Proposed Modifications are consistent with the impact conclusions for runoff identified in the Final MND/IS.

6.10.5 Flood Hazards

The Final MND/IS concluded that no impacts related to flood hazards would occur as a result of the Approved Project. The site is not located within a mapped floodplain or flood hazard area and no reservoir dam structures are located in the vicinity that could result in inundation at the site due to a dam failure.

The Proposed Modifications are located within the footprint of the Approved Project that was evaluated in the Final MND/IS. Thus, as with the Approved Project, the site of the Proposed Modifications is not located within a mapped floodplain or flood hazard area and would not be subject to inundation in the event of a failure of a dam structure. Furthermore, the Proposed Modifications do not involve the construction of residential units or any other structures that would subject inhabitants to flooding. The Proposed Modifications include slope and drainage improvements that would prevent flooding conditions at the site and adjacent residences. Therefore, the Proposed Modifications would not expose people or structures to a significant risk of loss, injury, or death due to flooding and no impacts would occur. The Proposed Modifications are consistent with the impact conclusions for flood hazards identified in the Final MND/IS.

6.10.6 Tsunami, Seiche, or Mudflow Hazards

The Final MND/IS concluded that no impacts related to tsunami, seiche, or mudflow hazards would occur as a result of the Approved Project due to the site's inland location, distance from water bodies, and construction of desiltation and detention basins.

The Proposed Modifications are located within the footprint of the Approved Project that was evaluated in the Final MND/IS. Thus, as with the Approved Project, the site of the Proposed Modifications is approximately five miles inland from the Pacific Ocean. Given the distance from the coast, the potential for the site to be inundated in the event of a large tsunami is extremely low. The nearest body of water, the Tijuana River, is located approximately 0.5 mile to the southwest. Given the distance from the river and the relatively small size of the Tijuana River, the site does not have the potential to experience seiche hazards. The Proposed Modifications involve slope and drainage improvements, which would minimize flood and siltation conditions at the site, thereby reducing the risk for mudflow inundation at the site. Impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for tsunami, seiche, and mudflow hazards identified in the Final MND/IS.

6.10.7 Conclusion

The Proposed Modifications would not alter the conclusions of hydrology and water quality impacts identified in the Final MND/IS. No new or substantially increased impacts related to hydrology or water quality would occur as a result of the Proposed Modifications.

6.11 Land Use and Planning

6.11.1 Community Division

The Final MND/IS concluded that no impacts related to community division would occur as a result of the Approved Project because it entailed improvement and expansion of an existing rail facility on the eastern edge of the San Ysidro community and did not include the construction of public roads, structures, or other improvements that would physically divide or separate neighborhoods within the established community.

The Proposed Modifications are located within the footprint of the Approved Project that was evaluated in the Final MND/IS and thus, the geographic location occurs in the same general vicinity. As with the Approved Project, no new roads, structures, or other infrastructure would be built that would physically divide the community. No impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for community division identified in the Final MND/IS.

6.11.2 Adopted Land Use Plan Consistency

The Final MND/IS concluded that the Approved Project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding environmental impacts. The Approved Project was determined to be consistent with the 2030 RTP (the adopted RTP at the time of the Final MND/IS), the City of San Diego General Plan, the San Ysidro Community Plan, and the San Diego Zoning Ordinance.

The Proposed Modifications are located within the rail ROW associated with the Rail Yard and entail slope and drainage improvements, retaining walls, and an access road that would support rail operations along the trolley and rail corridor. Like the Approved Project, they would be consistent with applicable land use plans. The currently adopted RTP is the 2019 Federal RTP (SANDAG 2019), which identifies improvements to support passenger and freight rail operations and goods movement. Additionally, the Proposed Modifications would not conflict with policies pertaining to freight rail in the Mobility Element (Section J, Goods Movement/Freight) of the City of San Diego General Plan. Specifically, Policy ME-J.1. recommends supporting infrastructure improvements that would facilitate the efficient transfer of goods between truck and rail transportation modes. Policy ME-J.9. recommends supporting efforts to facilitate the efficient movement of goods across the U.S.-Mexico Border. Additionally, the Proposed Modifications would not conflict with existing land use and zoning designations. As such, no impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for land use plan consistency identified in the Final MND/IS.

6.11.3 Habitat Conservation Plan Consistency

The Final MND/IS determined that the Approved Project would not conflict with the subregional MSCP or the City of San Diego's MSCP Subarea Plan. The Approved Project is located within the City's MSCP Subarea Plan, and less than 0.1 acre occurs within the MHPA, the City's preservation area. Implementation of the Approved Project did not result in permanent impacts to the MHPA. Therefore, land use impacts related to habitat conservation plan consistency were assessed as less than significant.

The Proposed Modifications are not located within or adjacent to MHPA lands and thus no impacts to the MHPA would occur and the Proposed Modifications would be consistent with the MSCP Subarea

Plan. No impacts related to habitat conservation plan consistency would occur, and the Proposed Modifications are consistent with the impact conclusions for habitat conservation plan consistency identified in the Final MND/IS.

6.11.4 Conclusion

The Proposed Modifications would not alter the conclusions of land use and planning impacts identified in the Final MND/IS. No new or substantially increased impacts related to land use and planning would occur as a result of the Proposed Modifications.

6.12 Mineral Resources

The Final MND/IS determined that the Approved Project would not impact mineral resources because the Approved Project site or surrounding area has not been used for mineral resource recovery and is not delineated as a mineral resource recovery site on any land use plans. Because the Approved Project site does not contain any known significant mineral resources and is not currently used (or planned for use) as a mineral resource recovery site, no impacts to mineral resources were assessed for the Approved Project.

The Proposed Modifications are located within the same area that was evaluated in the Final MND/IS and no mineral resource extraction uses have been established in the area since adoption of the Final MND/IS. Therefore, no impacts to mineral resources would occur, and the Proposed Modifications are consistent with the impact conclusions for mineral resources identified in the Final MND/IS.

6.13 Noise

6.13.1 Temporary and Permanent Increases in Noise

Temporary Construction-related Noise

The Final MND/IS concluded that temporary increases in noise generated during construction of the Approved Project would be less than significant based on compliance with City of San Diego Construction Noise Ordinance (Section 21.04 of the San Diego Municipal Code) requirements, which limits construction noise levels to an average of 75 decibels (dB) at residential uses during a 12-hour period between 7:00 a.m. and 7:00 p.m. Based on anticipated construction activities and associated equipment/machinery, the Final MND/IS determined that noise levels during construction would not exceed this standard, and construction-related noise impacts were assessed as less than significant.

As with the Approved Project, temporary noise would be generated from construction equipment during construction of the Proposed Modifications. Construction activities associated with the Proposed Modifications would occur between the hours of 7:00 AM and 7:00 PM, in adherence to the City of San Diego Construction Noise Ordinance, and generally would be less intense compared to the Approved Project due to the nature of proposed improvements. Although some construction activities would occur in close proximity to residential uses adjacent to the slope, such equipment would not require extensive work in one area for extended periods of time. Based on use of typical construction equipment, maximum single-event noise levels may be up to approximately 85 dB at a distance of 50 feet, but hourly and 12-hour average noise levels would be lower when taking into account time averaging and equipment usage factors. Noise levels during construction would increase temporarily above existing ambient conditions, which may be disruptive to nearby residences, but would not be

expected to exceed the 12-hour construction noise limit of 75 dB. Impacts related to temporary increases in noise would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for temporary increases in noise identified in the Final MND/IS.

Permanent Operational Noise

The Final MND/IS concluded that long-term operational noise generated by the Approved Project would be less than significant. Noise level increases due to traffic noise and Rail Yard operations were determined not to exceed applicable noise standards and impacts resulting from the Approved Project were assessed as less than significant.

The Proposed Modifications would not generate long-term operational noise as they consist of slope and drainage improvements, retaining walls, and a maintenance access road. Minor noise may be generated from the occasional vehicle using the proposed on-site maintenance access road; however, such activities would be both brief and infrequent and would not generate substantial noise. Therefore, impacts related to permanent increases in noise would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for permanent increases in noise identified in the Final MND/IS.

6.13.2 Groundborne Noise and Vibration

The Final MND/IS concluded that noise impacts related to groundborne noise and vibration would be less than significant. Based on the anticipated construction equipment necessary to construct the Approved Project improvements, no excessive groundborne noise or vibration was expected to be generated during construction of the Approved Project.

The Proposed Modifications include slope and drainage improvements, retaining walls, and a maintenance access road. This type of development does not include uses or equipment that generate excessive groundborne vibration. As with the Approved Project, groundborne noise and vibration impacts resulting from the Proposed Modifications would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for groundborne noise and vibration identified in the Final MND/IS.

6.13.3 Airport Noise

The Final MND/IS concluded that no impacts related to airport noise would occur as a result of the Approved Project. The closest airport to the Rail Yard is Brown Field at approximately three miles to the northeast. The Rail Yard lies outside its Airport Influence Area and would not result in exposure to excessive airport noise. Additionally, no private airstrips occur in the vicinity.

The Proposed Modifications are located within the footprint of the Approved Project that was evaluated in the Final MND/IS. Thus, as with the Approved Project, the Proposed Modifications are located outside of the Brown Field Airport Influence Area. In addition, the Proposed Modifications are not within any noise contour identified in the Brown Field Airport Land Use Compatibility Plan (San Diego County Regional Airport Authority 2010). Therefore, the Proposed Modifications would not result in the exposure of excessive airport noise to residents, students, or workers in the area. No impacts related to airport noise would occur, and the Proposed Modifications are consistent with the impact conclusions for airport noise identified in the Final MND/IS.

6.13.4 Conclusion

The Proposed Modifications would not alter the conclusions of noise impacts identified in the Final MND/IS. No new or substantially increased impacts related to noise would occur as a result of the Proposed Modifications.

6.14 Population and Housing

The Final MND/IS concluded that the Approved Project would not directly induce population growth because no housing or new businesses were proposed, nor would it indirectly induce population growth because it did not include the construction or extension of any new roads or infrastructure to previously undeveloped or inaccessible areas that would open up new areas for development. Additionally, the Approved Project did not displace any housing. As such, no impacts to population and housing were assessed for the Approved Project.

The Proposed Modifications also would not directly or indirectly induce population growth or displace housing or people for the same reasons as the Approved Project identified above. Therefore, no impacts to population and housing would occur, and the Proposed Modifications are consistent with the impact conclusions for population and housing identified in the Final MND/IS.

6.15 Public Services

The Final MND/IS concluded that the Approved Project would not generate population growth and therefore, would not substantially increase demand for public services, including fire and police protection, schools, and parks. Additionally, the Approved Project did not include the construction of any new residences or businesses which would generate a service need from police and fire protection agencies. No impacts to public services were assessed as a result of the Approved Project.

The Proposed Modifications consists of slope and drainage improvements, retaining walls, and a maintenance access road. Like the Approved Project, these features would not result in population growth and no increase in demand for public services would occur. Therefore, no impacts to public services would occur, and the Proposed Modifications are consistent with the impact conclusions for public services identified in the Final MND/IS.

6.16 Recreation

The Final MND/IS determined that because the Approved Project did not include a residential component and would not generate population growth, it would not create an increased demand for recreational facilities. Furthermore, the Approved Project did not require construction or expansion of recreational facilities. No impacts related to recreation were assessed as a result of the Approved Project.

The Proposed Modifications also would not generate population growth, nor would it include or require construction or expansion of recreational facilities. No impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for recreation identified in the Final MND/IS.

6.17 Transportation/Traffic

6.17.1 Circulation System Performance

As discussed in the Final MND/IS, a traffic study was conducted to evaluate impacts to roadway segments and intersections in the vicinity of the Rail Yard with implementation of the Approved Project and associated traffic. The Final MND/IS concluded traffic impacts on the surrounding circulation system were less than significant.

The Proposed Modifications consist of slope and drainage improvements, retaining walls, and a maintenance access road. Traffic associated with the construction of these features would be minimal and would not cause a significant increase in congestion that would substantially affect local roadways and intersections. Additionally, operation of the Proposed Modifications would not substantially increase traffic. The proposed access road would be used infrequently by maintenance vehicles, and would not support traffic from the general public. The traffic associated with the construction and operation of the Proposed Modifications would be minimal and would not interfere with any plan, ordinance, or policy addressing the circulation system. Therefore, traffic circulation impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for circulation system performance identified in the Final MND/IS.

6.17.2 Air Traffic Patterns

As discussed in the Final MND/IS, the Approved Project did not include any aviation components or structures where height would be an aviation concern and therefore, it was concluded that air traffic patterns would not be affected. No associated impacts to air traffic patterns were assessed for the Approved Project.

The Proposed Modifications also do not include any aviation components or tall structures that would affect air traffic patterns. Therefore, no impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for air traffic patterns identified in the Final MND/IS.

6.17.3 Traffic Design Hazards

The Final MND/IS determined that the Approved Project would not increase hazards due to a design feature or incompatible uses. A new access road was constructed that extends from East Beyer Boulevard but the intersection of the access road with East Beyer Boulevard was designed so that no traffic hazards occur with respect to intersection geometry or sight distance requirements. Additionally, the Approved Project maintained primary access to the Rail Yard via the entrance off East Beyer Boulevard and did not introduce any new design hazards. Impacts were assessed as less than significant for the Approved Project.

There would be no hazardous design features or incompatible uses introduced upon implementation of the Proposed Modifications. A new maintenance access road at the northern end of the site would be constructed that extends from the existing access road. The new access road would occur within the rail ROW and would be designed in accordance with applicable engineering standards such that no traffic design hazards would occur. No other components of the Proposed Modifications would create a traffic design hazard. Therefore, impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for traffic design hazards identified in the Final MND/IS.

6.17.4 Emergency Access

The Final MND/IS concluded that no impacts related to emergency access would occur as a result of the Approved Project because temporary construction activities would not hinder access to roadways in the project area by emergency vehicles and emergency access to the Rail Yard would be provided from either the existing primary entrance or the access road.

During construction of the Proposed Modifications, access to roadways in the vicinity by emergency vehicles would not be impeded. Like the Approved Project, emergency access to the site would be provided from the proposed maintenance access road or from the primary access to the Rail Yard. Therefore, as with the Approved Project, no traffic impacts related to emergency access would occur and the Proposed Modifications are consistent with the impact conclusions for emergency access identified in the Final MND/IS.

6.17.5 Alternative Transportation

As discussed in the Final MND/IS, the Approved Project consisted of improvements to an existing rail yard facility that supports freight rail operations. These rail operations are an alternative transportation mode for cross-border goods movement and are consistent with policies that encourage freight rail operations and goods movement. The Final MND/IS concluded that the Approved Project would not conflict with adopted policies, plans, or programs supporting alternative transportation and no impacts were assessed.

The Proposed Modifications would further support freight rail operations at the Rail Yard, as well as trolley operations since the tracks above the slope are utilized by both freight rail and the trolley. As such, the Proposed Modifications would be consistent with adopted plans that support and/or promote alternative transportation modes. No impacts would occur, and the Proposed Modifications are consistent with the impact conclusions for alternative transportation identified in the Final MND/IS.

6.17.6 Conclusion

The Proposed Modifications would not alter the conclusions of transportation/traffic impacts identified in the Final MND/IS. No new or substantially increased impacts related to traffic would occur as a result of the Proposed Modifications.

6.18 Tribal Cultural Resources

The topic of Tribal Cultural Resources was added as a separate topic to the CEQA Guidelines Appendix G in 2016, and therefore was not addressed as a separate topic in the Final MND/IS that evaluated the Approved Project. Tribal Cultural Resources were previously addressed more broadly as part of the Cultural Resources section in the Final MND/IS. Potential impacts to Tribal Cultural Resources due to the Proposed Modifications are addressed in this section.

6.18.1 Tribal Cultural Resources

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, and is either listed or eligible for listing in the

national, state, or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a Tribal Cultural Resource (PRC Section 21074).

As discussed in the Cultural Resources section of the Final MND/IS, the California Native American Heritage Commission (NAHC) was requested to conduct a search of their Sacred Lands files to determine if any traditional cultural properties or Native American heritage sites are located in the site or vicinity of the Approved Project. The NAHC replied that no known resource sites are recorded in the project area. In addition, Native American representatives in the project area were contacted to notify them of the Approved Project and to solicit any concerns. No responses were received. Additionally, the Final MND/IS concluded that the potential to encounter human remains at burial grounds during construction of the Approved Project would be low and no associated impacts were assessed.

The Proposed Modifications are located entirely within the footprint of the Approved Project that was evaluated in the Final MND/IS. Thus, as with the Approved Project, no known tribal cultural resources are present within the site of Proposed Modifications and the potential to encounter tribal cultural resources during construction would also be low. Therefore, no impacts to tribal cultural resources would occur, and the Proposed Modifications are consistent with the impact conclusions for cultural resources identified in the Final MND/IS.

6.18.2 Conclusion

As discussed above, the topic of Tribal Cultural Resources was not addressed as a separate topic in the Final MND/IS but was addressed at a broad level as part of the discussion and analysis of cultural resources. Nonetheless, the Proposed Modifications would not alter the conclusions of impacts to Tribal Cultural Resources identified in the Final MND/IS. No new or substantially increased impacts related to Tribal Cultural Resources would occur as a result of the Proposed Modifications.

6.19 Utilities and Service Systems

6.19.1 Water and Wastewater Facilities

The Final MND/IS concluded that impacts to water and wastewater facilities would be less than significant as a result of the Approved Project. The Approved Project did not include any facilities that would generate a substantial increase in the demand for water or wastewater services and would not require new or expanded facilities.

The Proposed Modifications entail slope and drainage improvements, retaining walls, and a maintenance access road. These features would not generate wastewater or an increased demand for water or wastewater services. No impacts would occur. The Proposed Modifications therefore would not result in new or substantially increased impacts to water and wastewater facilities.

6.19.2 Storm Water Facilities

As discussed in the Final MND/IS, the Approved Project included drainage improvements to alleviate flood and siltation conditions that occurred at the Rail Yard. Drainage improvements were constructed to collect and convey on-site runoff and peak flows into the existing municipal storm water drainage system. Impacts were assessed as less than significant for the Approved Project.

The Proposed Modifications include slope and drainage improvements to better collect and convey existing slope drainage at the site of the Proposed Modifications into the municipal storm drain system. The proposed drainage facilities would accommodate storm water flows, improve overall storm water capture, and would not, in turn, require new or expanded facilities. Therefore, impacts would be less than significant, and the Proposed Modifications are consistent with the impact conclusions for storm water facilities identified in the Final MND/IS.

6.19.3 Water Supply

As discussed in the Final MND/IS, the Approved Project would result in a negligible increased demand for water but would not require construction or expansion of existing water supply facilities or entitlements. No impacts related to water supply as a result of the Approved Project were assessed.

The Proposed Modifications entail slope and drainage improvements, retaining walls, and a maintenance access road. Negligible amounts of water may be used during construction; however, such water usage would be both temporary and minimal. Once constructed, the Proposed Modifications would not require water. Therefore, no impacts related to water supply would occur, and the Proposed Modifications are consistent with the impact conclusions for water supply identified in the Final MND/IS.

6.19.4 Solid Waste Management

The Final MND/IS concluded no impacts related to solid waste management would occur as a result of the Approved Project. Any additional solid waste generated by the Approved Project would be negligible and determined not to substantially affect regional landfill capacities.

Similar to the Approved Project, the Proposed Modifications would not generate a substantial amount of solid waste. Waste would be generated during construction; however, the construction contractor would be required to dispose of solid wastes in accordance with applicable federal, state, and local solid waste disposal requirements, and all non-recyclable solid waste generated during construction would be taken to a landfill with sufficient permitted capacity. Once constructed, the Proposed Modifications would not generate solid waste. Therefore, no impacts related to solid waste management would occur, and the Proposed Modifications are consistent with the impact conclusions for solid waste management identified in the Final MND/IS.

6.19.5 Conclusion

The Proposed Modifications would not alter the conclusions of utilities and service systems impacts identified in the Final MND/IS. No new or substantially increased impacts related to utilities and service systems would occur as a result of the Proposed Modifications.

6.20 Wildfire

The topic of Wildfire was added as a separate topic to the CEQA Guidelines Appendix G in 2019, and therefore was not addressed as a separate topic in the Final MND/IS that evaluated the Approved Project. Wildfire impacts were previously addressed more broadly as part of the Hazards and

Hazardous Materials section in the Final MND/IS. Potential impacts to wildfire due to the Proposed Modifications are addressed in this section.

6.20.1 Emergency Response or Evacuation Plan

As discussed in Section 6.9.4 in this Addendum, the Final MND/IS concluded that no impacts related to emergency response and evacuation plans would occur as a result of the Approved Project because primary access to all major roads and emergency vehicle access would be maintained during construction of the Approved Project.

Similar to the Approved Project, the Proposed Modifications would not impair or physically interfere with an adopted emergency response or evacuation plan. Primary access to all major roads would be maintained during the construction period of the Proposed Modifications and construction activities would not interfere with access for emergency vehicles. Once constructed, the Proposed Modifications would have no impact on roadways, and therefore would not interfere with an emergency response or evacuation routes. The proposed access road would only be used by authorized vehicles for on-site maintenance. Therefore, no wildfire impacts related to emergency response and evacuation plans would occur.

6.20.2 Pollutant Concentrations from a Wildfire

According to the Very High Fire Hazard Severity Zones in Local Responsibility Areas map prepared by the California Department of Forestry and Fire Protection (CAL FIRE) for the City of San Diego, the Proposed Modifications are located within a Very High Fire Hazard Severity Zone (CAL FIRE 2009). However, the Proposed Modifications would not exacerbate fire risk at the site. The Proposed Modifications include slope and drainage improvements, retaining walls, and a maintenance access road. By reducing slope gradients and removing vegetation, wildfire risks at the site would be reduced. Additionally, the Proposed Modifications would not construct any buildings that would be occupied by people. Therefore, impacts related to the exacerbation of wildfire risk and exposure of project occupants to pollutant concentrations from a wildfire would be less than significant.

6.20.3 Installation or Maintenance of Infrastructure

The Proposed Modifications include slope and drainage improvements, retaining walls, and a maintenance access road. The proposed access road would traverse a portion of the site and would only be used to provide vehicular access to the site for infrequent maintenance activities, which would not create or increase wildfire risk. Therefore, impacts related to the exacerbation of fire risk resulting from the installation or maintenance of associated infrastructure due to the Proposed Modifications would be less than significant.

6.20.4 Post-Fire Hazards

The Proposed Modifications would include slope and drainage improvements, which would minimize the potential for runoff, post-fire slope instability, or drainage changes. As stated above, the Proposed Modifications would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and would not expose people to significant levels of pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The risk of people and structures experiencing significant risks such as downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or

drainage changes is negligible. Wildfire impacts due to the Proposed Modifications would be less than significant.

6.20.5 Conclusion

The Proposed Modifications would not result in significant wildfire impacts. Therefore, the Proposed Modifications would not result in new significant impacts.

7. ENVIRONMENTAL DETERMINATION

This Addendum has been prepared in accordance with the provisions of CEQA and documents that none of the conditions or circumstances that would require preparation of a subsequent EIR or MND, pursuant to CEQA Guidelines Sections 15162 and 15164, exists in connection with the Proposed Modifications.

As discussed in Section 6 of this Addendum, the Proposed Modifications would not result in new significant impacts or a substantial increase in the severity of previously identified impacts. There have been no substantial changes proposed to the Approved Project that would require major revisions to the Final MND/IS due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. There have been no substantial changes with respect to the circumstances under which the Approved Project is undertaken which would require revisions to the Final MND/IS. There is no new information of substantial importance which shows that the Approved Project would have significant environmental effects either not discussed or that would be substantially more severe than discussed in the Final MND/IS. Additionally, there have been no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible, nor are there measures or alternatives considerably different than those analyzed in the Final MND/IS that would reduce identified significant impacts.

Therefore, preparation of a subsequent EIR or MND is not required, and the appropriate CEQA document for the Proposed Modifications is this Addendum to the Final Mitigated Negative Declaration/Initial Study for the San Ysidro Freight Rail Yard Improvements. No additional environmental analysis or review is required for the Proposed Modifications. This Addendum will be maintained in the administrative record files at SANDAG offices.

8. REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE)

2009 Very High Fire Hazard Severity Zones in Local Responsibility Areas as Recommended by CAL FIRE – San Diego. June 11.

Federal Emergency Management Agency (FEMA)

2012a National Flood Hazard Layer FIRMette 06073C2166G. May 16.

2012b National Flood Hazard Layer FIRMette 06073C2170G. May 16.

HELIX Environmental Planning, Inc.

2020a Biological Resources Memorandum – Beyer Boulevard Slope and Drainage, Environmental, Final Design, and Support During Construction. December 4.

2020b Cultural Resources Memorandum for the Beyer Boulevard Slope and Drainage Environmental, Final Design, and DSDC. December 2.

City of San Diego

2015 General Plan Mobility Element. June 29.

San Diego Air Pollution Control District (SDAPCD)

2020 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County. October.

San Diego Association of Governments (SANDAG)

2021 2021 Regional Transportation Improvement Program. February 26.

2019 2019 Federal Regional Transportation Plan. October 25.

2011 Final Mitigated Negative Declaration/Initial Study for the San Ysidro Freight Rail Yard Improvement Project. February.

San Diego County Regional Airport Authority

2010 Brown Field Municipal Airport Land Use Compatibility Plan. December 20.

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