



San Diego Unified Port District
3165 Pacific Highway San Diego, California 92101
(619) 686-6254

NOTICE OF PREPARATION
of a
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: Wetlands Mitigation Bank at Pond 20 and Port Master Plan Amendment (UPD #EIR-2019-010)
APPLICANT: San Diego Unified Port District
LOCATION: Palm Avenue (State Route 75) between 13th Street and 16th Street, San Diego, in San Diego County, California
REFERENCE: California Code of Regulations, Title 14, Sections 15082(a), 15103, 15375

The San Diego Unified Port District (District) will be the Lead Agency in preparing an Environmental Impact Report (EIR) for the project (proposed project or project) identified above. The District is soliciting input and feedback from various agencies, stakeholders, and the public pertaining to the scope and content of the environmental information that will be included in the EIR. For certain agencies, this may be germane to statutory responsibilities in connection with the proposed project. An agency may need to use the proposed project's EIR when considering its permit or other approval for the project. The project description, location, and possible environmental effects of the proposed project are contained in the attached materials.

Due to the time limits mandated by state law, your comments must be sent at the earliest possible date but no later than 30 days after receiving this notice. **Comments regarding environmental concerns will be accepted until 5:00 p.m. on July 22, 2019** and should be mailed to Ashley Wright, San Diego Unified Port District, Planning Department, 3165 Pacific Highway, San Diego, CA 92101 or emailed to awright@portofsandiego.org.

A public scoping meeting regarding the proposed EIR will be held on Wednesday July 10, 2019 at 6:00 p.m. at the Dempsey Center at 950 Ocean Lane, Imperial Beach, CA, 91932.

For questions on this Notice of Preparation, please contact Ashley Wright, Senior Planner, Planning Department, at 619-686-6549.

Signature
Lesley Nishihira
Director, Planning Department

6/12/2019

Date:

This page is intentionally blank.



San Diego Unified Port District
3165 Pacific Highway
San Diego, California 92101

NOTICE OF PREPARATION

for the

WETLAND MITIGATION BANK AT POND 20 AND PORT MASTER PLAN AMENDMENT

(UPD #EIR-2019-010)

Publication of this Notice of Preparation (NOP) initiates the San Diego Unified Port District's (District's) compliance with the California Environmental Quality Act for the proposed project. The NOP is the first step in the Environmental Impact Report (EIR) process and will, in most cases, establish the baseline for the environmental setting. It describes the proposed project and is distributed to responsible agencies, trustee agencies, cooperating federal agencies, and the general public. As stated in California Environmental Quality Act Guidelines Section 15375, the purpose of the NOP is "to solicit guidance from those agencies as to the scope and content of the environmental information to be included" in the EIR. The NOP provides an opportunity for agencies and the general public to comment on the scope and content of the environmental review of a project.

Project Summary

The Wetland Mitigation Bank at Pond 20 and Port Master Plan Amendment (PMPA) includes two primary components: "project-level" and "program-level" environmental evaluation.

1. The District is proposing the creation of a wetland mitigation bank within a portion of District-owned property, which was historically used as salt evaporation pond (Bank Parcel). The project includes associated construction and long-term operation and maintenance activities of the mitigation bank. The District is proposing a PMPA to incorporate the Bank Parcel into the District's Port Master Plan (PMP), and assign a land use designation of "wetlands". The creation of the wetland mitigation bank, as well as the incorporation and land use designation of the Bank Parcel into the PMP through a PMPA, will be evaluated at a "project level" in the EIR.
2. As part of the PMPA, the District is proposing to incorporate Parcels A, B, and C into the District's PMP, and assign land use designations. Parcels A, B, and C are District-owned property; however, currently these areas are not formally incorporated into the PMP. Parcels A, B, and C would be assigned a "commercial recreation" and/or "wetlands" land use designation. Incorporation of Parcels A, B, and C into the PMP will be evaluated at a "program level" in the EIR.

Project Location

The project site consists of approximately 95 acres, which comprises a combination of District-owned and federally-managed land located in the City of San Diego, east of the City of Imperial Beach and south of the confluences of Otay River and San Diego Bay. The District- and federally-managed land is leased from the California State Lands Commission. The project site is located within the Imperial Beach United States Geological Survey 7.5-minute quadrangle and entirely within the Coastal Zone.

There is no official address for the project site; however, it is located immediately north of Palm Avenue (State Route 75), south of the San Diego Bay National Wildlife Refuge South San Diego Bay Unit managed by U.S. Fish and Wildlife Service, east of 13th Street, west of 16th Street, and southwest of Refuge's Otay Valley Regional Park. Interstate-5 (I-5) is located approximately one mile east of the project site (Figure 1). Surrounding land uses include the San Diego Bay National Wildlife Refuge and Otay River Estuary Restoration Project site to the north and commercial and residential developments to the south, east, and west.

Project Description

The project site is divided into two main areas, as shown on Figure 2: (1) the Bank Parcel and (2) Parcels A, B, and C. The Bank Parcel comprises 83.5 acres and contains the southern portion of the former salt evaporation pond, known as Pond 20. The Bank Parcel extends beyond the existing salt pond berms to also include Nestor Creek and the Otay River Tributary. The wetland mitigation bank, or Bank Site, would be developed entirely within the existing Pond 20 berms in the Bank Parcel and would be up to 80 acres. Parcels A, B, and C are located immediately adjacent to the Bank Parcel but entirely outside of the Bank Site berms. Parcels A, B, and C comprise approximately 11.7 acres of land.

Wetland Mitigation Bank at Pond 20

The proposed Bank Site (within the Bank Parcel) involves the creation, restoration, enhancement, and on-going maintenance and monitoring of tidal wetland habitat and upland buffer habitat. Project implementation would result in the creation of high marsh, mid marsh, low marsh, intertidal mudflat, transitional habitat, and subtidal eelgrass habitat mitigation credits that could compensate for future off-site impacts to marine, wetland, and transitional habitat from other public and private development projects under Section 404 of the Clean Water Act, the California Coastal Act, the Porter-Cologne Water Quality Control Act, Fish and Game Code Section 1600, and the California Eelgrass Mitigation Policy. The credits would be available to mitigate impacts within a proposed service area.

The Bank Site would be constructed entirely within the existing berms of Pond 20, which leaves the surrounding features, Nestor Creek and the Otay River Tributary, as natural buffers. The proposed Bank Site is currently isolated from tidal flow. To reconnect tidal hydrology to the Bank Site, the proposed project would require a berm breach of approximately 75 feet in the northwest corner of the project site. The berm breach would partially be located within the San Diego Bay National Wildlife Refuge. This component would be subject to a U.S. Fish and Wildlife Service Refuge Special Use Permit and would require compliance with the National Environmental Policy Act.

Bank Site construction would involve excavation, grading, and soil export activities to establish appropriate topographical conditions and tidal flows to support target marsh-plain elevations. Construction staging areas would be located in the adjacent District-owned parcels. Construction is anticipated to take approximately 17 months.

Operation and maintenance of the Bank Site will be financed by the District's operational funds, a stable source of revenue for the District dedicated to specific uses for the benefit of the state tidelands under its stewardship. A functional assessment will be conducted to document the pre- and post-restoration differences for wetland site conditions. The functional assessment methodology will be reviewed by an Interagency Review Team and approved by the U.S. Army Corps of Engineers, and will be used to set the restoration goals success criteria for the proposed project. Performance standards will cover each type of credit established by the project, including establishment of subtidal eelgrass habitat, tidal and intertidal marsh wetland habitat, and upland buffer/transitional habitat. A 5-year monitoring schedule will be established, but, if all performance standards are met prior to the fifth year of monitoring, all bank credits would be released.

Once all performance standards have been met, the Bank Site is anticipated to be self-sustaining. However, because of the urban surroundings, long-term management may be needed for maintenance of invasive species monitoring and removal, trash removal, maintenance of site control measures (e.g., fencing), and restoration of any damage from human or natural phenomenon.

Establishment of the Bank Site would be completed using the process outlined by the United States Environmental Protection Agency and U.S. Army Corps of Engineers *Draft Compensatory Mitigation Rule Timeline for Bank for ILF Instrument Approval*. A bank-enabling instrument would be prepared using the appropriate template and, following the completion of the public notice comment period, the bank-enabling instrument would be submitted for review to the Interagency Review Team. Operation of the mitigation bank includes offering compensatory mitigation credits for impacts within the service area.

Port Master Plan Amendment

Bank Parcel

The PMP provides the official planning policies, consistent with a general statewide purpose, for the physical development of the tide and submerged lands conveyed and granted in trust to the District. The Bank Parcel is not currently in the PMP and, therefore, does not currently have a land use designation. As a result, a PMPA would be processed and approved by the California Coastal Commission to incorporate the Bank Parcel into the PMP that would allow for the District to issue a non-appealable Coastal Development Permit for the wetland mitigation bank. To provide long-term assurance, the District proposes to designate the proposed Bank Parcel as a "wetlands" land use in the PMP through the PMPA process.

District-Owned Parcels A, B, and C

District-owned Parcels A, B, and C are located outside the berms along the western, southern, and eastern borders of the Bank Parcel. Parcels A and C are separated from the berms by Nestor Creek and the Otay River Tributary, respectively. These three parcels are not currently in the PMP and would be incorporated and assigned a "commercial recreation" and/or "wetlands" land use designation as part of the PMPA process. No specific project-level analysis with regard to potential future uses will be analyzed on Parcels A, B, and C at this time. Development of these parcels would require preparation of a project-level California Environmental Quality Act document(s).

Environmental Considerations

Probable Environmental Effects to be addressed in the EIR

Based on the initial review of the proposed project, the EIR would address the probable project-related and cumulative effects associated with the implementation of the proposed project for the following resource areas:

- Aesthetics
- Air quality
- Biological resources
- Cultural resources
- Energy
- Geology/soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology/water quality
- Land use/planning
- Noise
- Public services
- Transportation
- Tribal cultural resources
- Utilities/service systems
- Mandatory findings of significance

Resources Eliminated From Further Discussion in the EIR

Based on the existing conditions present at the proposed project site and a review of the proposed project, it has been determined that implementation of the proposed project would not result in impacts on several resource areas and, therefore, these issues would be summarized in the Effects Found Not to Be Significant section of the EIR. Those resource areas are listed below. See the attached Initial Study/Environmental Checklist for a detailed explanation.

- Agriculture and forestry resources
- Mineral resources
- Population and housing
- Recreation
- Wildfire

Comments

The NOP is available for a 30-day public review period that **starts on Thursday, June 20, 2019 and ends at 5:00 p.m. on Monday, July 22, 2019**. Comments regarding the scope and content of the environmental information that should be included in the EIR and other environmental concerns should be mailed to:

San Diego Unified Port District
Planning Department
Attn: Ashley Wright, Senior Planner
3165 Pacific Highway
San Diego, CA 92101
or emailed to: awright@portofsandiego.org

Public Scoping Meeting

A scoping meeting to solicit comments on the scope and content of the EIR for the proposed project will be held on **Wednesday July 10, 2019, at 6:00 p.m. at the Dempsey Center at 950 Ocean Lane, Imperial Beach, CA, 91932**.

The District, as Lead Agency pursuant to the California Environmental Quality Act, will review the public comments on the NOP to determine what issues should be addressed in the EIR.

Other opportunities for the public to comment on the environmental effects of the proposed project include:

- A minimum 45-day public review and comment period for the Draft EIR
- A public heading for the Board of Port Commissioners to consider certification of the EIR

For questions regarding this NOP, please contact Ashley Wright, Senior Planner, Planning Department, at 619-686-6549.

Attachments

Figure 1. Regional Location and Project Vicinity

Figure 2. Project Site Characteristics

Initial Study/Environmental Checklist

Figure 1. Regional Location and Project Vicinity

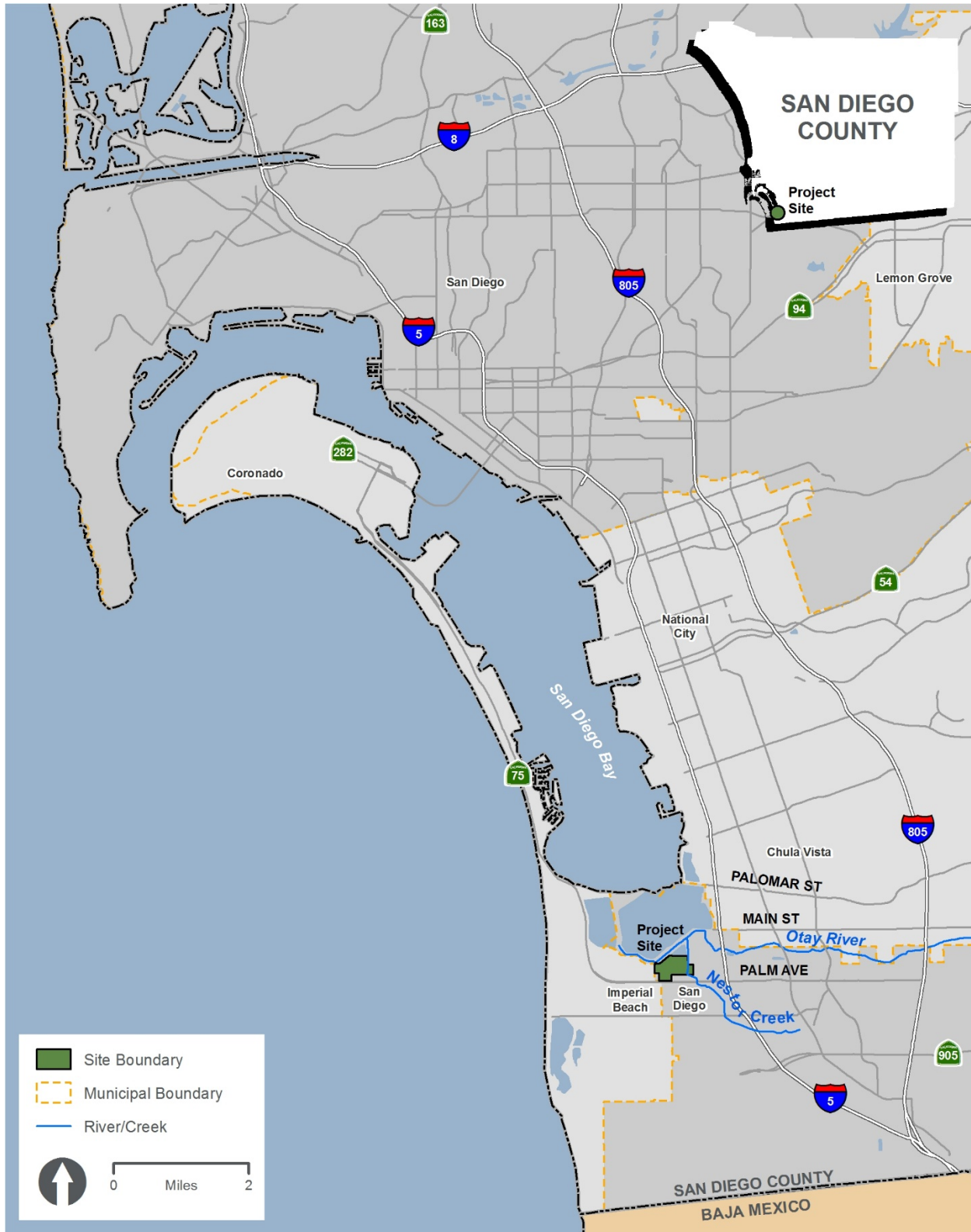


Figure 2. Project Site Characteristics



This page is intentionally blank.



Initial Study/ Environmental Checklist

Wetland Mitigation Bank at Pond 20 and Port Master Plan Amendment

San Diego, California

June 2019

Prepared for:

San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Prepared by:

HDR Engineering, Inc.
591 Camino de la Reina,
Suite 300
San Diego, CA 92108

This page is intentionally blank.



Contents

Initial Study/Environmental Checklist Form	1
Environmental Factors Potentially Affected	3
Determination (To be completed by the Lead Agency).....	4
Evaluation of Environmental Impacts.....	5
I. Aesthetics	7
II. Agricultural Resources	9
III. Air Quality	11
IV. Biological Resources	13
V. Cultural Resources	17
VI. Energy	19
VII. Geology and Soils	21
VIII. Greenhouse Gas Emissions	25
IX. Hazards and Hazardous Materials	26
X. Hydrology and Water Quality	30
XI. Land Use and Planning	34
XII. Mineral Resources	36
XIII. Noise	37
XIV. Population and Housing	39
XV. Public Services	40
XVI. Recreation	43
XVII. Transportation	44
XVIII. Tribal Cultural Resources.....	46
XIX. Utilities and Service Systems	48
XX. Wildfire	51
Mandatory Findings of Significance	53
References	55

Acronyms and Abbreviations

CEQA	California Environmental Quality Act
District	San Diego Unified Port District
EIR	environmental impact report
GHG	greenhouse gas
PMP	Port Master Plan
PMPA	Port Master Plan Amendment
project	Wetlands Mitigation Bank at Pond 20 and Port Master Plan Amendment
SDFD	San Diego Fire-Rescue Department
Spindrift	Spindrift Archaeological Consulting, LLC

Initial Study/Environmental Checklist Form

1. Project Title: Wetland Mitigation Bank at Pond 20 and Port Master Plan Amendment
2. Lead Agency and Address: San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101
3. Contact Person and Phone Number: Ashley Wright, Planning Department
(619) 686-6549
4. Project Location: The Wetland Mitigation Bank at Pond 20 and Port Master Plan Amendment Project (project) is located in the City of San Diego, east of the City of Imperial Beach and south of the confluences of Nestor Creek, the Otay River, and San Diego Bay. The project site is located immediately north of Palm Avenue (State Route 75), south of the San Diego Bay National Wildlife Refuge South San Diego Bay Unit managed by U.S. Fish and Wildlife Service, east of 13th Street, and west of Otay Valley Regional Park.
5. Project Sponsor's Name and Address: San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101
6. Description of Project: The Wetland Mitigation Bank at Pond 20 and Port Master Plan Amendment (PMPA) Project includes two primary components: 1) the creation of a wetland mitigation bank within a portion of a former salt pond currently known as Pond 20 (Bank Site); and, 2) a PMPA to incorporate the Bank Site and three adjacent San Diego Unified Port District- (District) owned parcels (Parcels A, B, and C) into the District's Port Master Plan (PMP). The Bank Site would be up to 80 acres and constructed within the 83.5-acre District-owned Bank Parcel. Parcels A, B, and C are outside the Bank Site and encompass 11.7 acres. The environmental impact report (EIR) will evaluate the creation and incorporation of the wetland mitigation bank into the PMP at a "project-level" and the incorporation of the District-owned parcels at a "program-level."

7. Surrounding Land Uses and Setting: The project site is surrounded by the South San Diego Bay National Wildlife Refuge and Otay River to the north and residential, commercial, and infrastructure development to the south, west, and east.
8. Other Public Agencies whose Approval is Required (e.g., permits, financing approval, or participation agreement.):
- U.S. Fish and Wildlife Service – Special Use Permit
 - U.S. Army Corps of Engineers – Clean Water Act Section 404 Permit
 - U.S. Coast Guard – General Bridge Act of 1946 Bridge Permit
 - California Coastal Commission – Coastal Consistency Analysis, Port Master Plan Amendment, and Federal Coastal Consistency Certification
 - State Water Resources Control Board – Construction General Permit and Clean Water Act Section 401 Permit
9. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?
- No tribes have contacted the District to request notification of projects under Assembly Bill 52; therefore, no tribal consultation has begun.

Note: Conducting consultation early in the California Environmental Quality Act (CEQA) process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “potentially significant impact” as indicated by the checklist on the following pages.

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

Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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




Signature

6/12/2019

Date:

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

- 
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.



I. Aesthetics

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

Except as provided in Public Resources Code Section 21099, would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site is located immediately adjacent to the San Diego Bay National Wildlife Refuge and Silver Strand Bikeway. Construction of the Wetland Mitigation Bank is expected to last approximately 17 months. During project construction, soil stock piles, large equipment, and general excavation activities would temporarily impact a scenic vista, which would be significant. However, once the project is complete, the project site would be visually improved. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on a scenic vista. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The southern boundary of the project site is Palm Avenue, which is also State Highway 75. State Highway 75 is an Officially Designated State Scenic Highway along the Silver Strand Highway and the Coronado Bridge, according to the California Scenic Highway Mapping System (California Department of Transportation 2011). While the portion of the highway that borders the project site is not officially designated, it is a main access point to the scenic highway. Additionally, construction may be visible from the state scenic highway. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project is located in an urbanized area. During project construction, the existing visual character of the site would be disrupted, which would be potentially significant. However, once construction is complete, the visual character of the site would be improved. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on a scenic vista. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. No new light sources or structures that could produce glare would be installed or used during construction. Thus, no impact is anticipated for this criterion, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation wetlands. If these parcels are developed, there could be a potentially significant impact due to new sources of light or glare. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.



II. Agricultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.</i></p> <p><i>Would the project:</i></p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

No Impact. According to the California Department of Conservation, the project site is not designated for agriculture use. Thus, no impact is anticipated for this criterion, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site is not zoned or designated for agriculture use and is not subject to a Williamson Act contract. Thus, no impact is anticipated for this criterion, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. There are no existing forest lands, timberlands, or timberland zoned “Timberland Production” either on site or in the immediate vicinity that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. There are no existing forest lands either on site or in the immediate vicinity of the project site. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. According to the California Department of Conservation, the project site is not designated for agriculture use, and there is no forest land on the project site or in the immediate vicinity. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.



III. Air Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i>				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site is located within the jurisdiction of the San Diego Air Pollution Control District. The project would involve excavation, grading, and soil export activities to establish appropriate topographical conditions and tidal flows to support target marsh-plain elevations. Construction of the project would create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the San Diego Air Pollution Control District rules and regulations or other state and local mandated plans, such as the *2009 Regional Air Quality Strategy Revision*, San Diego Air Pollution Control District’s 2002 and 2012 ozone maintenance plans, and the California Air Resources Board 2017 *8-Hour Ozone*

Attainment Plan for San Diego County. No stationary source emissions would result from the project; however, temporary construction emissions have the potential to result in a significant air quality impact. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, construction activities could create temporary emissions of dust, fumes, equipment exhaust, and other air contaminants that may conflict with the San Diego Air Pollution Control District rules and regulations. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Construction of the proposed project may result in a cumulatively considerable net increase of one or more criteria pollutants as a result of point and non-point source emissions, for which the project region is in non-attainment under applicable federal and state ambient air quality standards. Thus, a potentially significant impact is identified for this issue area. An air quality impact study that will address the proposed project's potential air quality impacts will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Sensitive receptors in the area are primarily the residences south and west of the project site, in the cities of Imperial Beach and San Diego. An air quality impact study that will address the proposed project's potential air quality impacts will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies (California Air Resources Board 2005). The construction and operation of a wetland mitigation bank is not an odor producer, and the project site is not located near an odor producer. No impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Land uses commonly considered to be potential sources of odorous emissions include wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, and concentrated agricultural feeding operations and dairies (California Air Resources Board 2005). The proposed project would allow for Parcels A, B, and C to be assigned a commercial recreation or wetlands designation. The construction and operation of a commercial recreation or wetlands project would not likely be odor producing, and the project site is not located near an odor producer. However, if these parcels are developed as any of the identified odorous land uses, a potential impact could occur. An air quality impact study that will address the proposed project's potential air quality impacts will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.



IV. Biological Resources

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

IV. Biological Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site is currently disturbed and consists of relatively low-quality habitat. As a result of biological surveys conducted between 2017 and 2018, several special-status and plant species are either known to occur or have the potential to occur in the study area, including the Western snowy plover (federally threatened) and Belding’s savannah sparrow (state endangered). Eight additional special-status wildlife species and one special-status plant species have also been observed (Tierra Data, Inc. 2018). The project would create estuarine wetlands, which would produce a net benefit for coastal and wetland dependent species. While impacts would occur during construction of the mitigation bank, they would be temporary; there will be an increase in functional habitat values once the project is in operation. A biological resources technical study that addresses the proposed project’s potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. Preliminary findings did not identify special-status and plant species known to occur, or have the potential to occur, on Parcels A, B, and C. However, given the proximity to the proposed mitigation bank and surrounding properties that support candidates, sensitive, or special-status species, if these parcels are developed in the future, there would be a potentially significant impact. A biological resources technical study that addresses the proposed project’s potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. See Section IV (a) above. The 2017-2018 biological surveys indicated that previous studies of the project site have documented special-status shorebirds, colonial seabirds, and waterfowl. These species are associated with available foraging opportunities in nearby ocean, estuarine, and intertidal wetlands, and riparian vegetation at the mouth of the Otay River; as well as nesting and roosting opportunities within low-vegetation cover on site (Tierra Data, Inc. 2018). A biological resources technical study that addresses the proposed project’s potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Parcel A is comprised mostly of non-native grassland, with small stands of ice plant and crown daisy. It also contains areas of pickleweed and seablite.

Parcel B is dominated by non-native grasslands. There are several desertbroom baccharis shrubs.

Parcel C is predominantly non-native grasses and forbs divided between semi-natural herbaceous stands, semi-natural herbaceous stand, and semi-natural herbaceous stands. A small area within has native saltgrass as the dominant species. The Nestor Creek stream channel along the western edge of Parcel C also contains pickleweed and alkali heath.

The parcels would be designated as commercial recreation or wetlands. Preliminary findings did not identify riparian habitat or other sensitive natural community on Parcels A, B, and C. However, given the proximity to the proposed mitigation bank and surrounding properties that support riparian habitat and sensitive natural communities, if these parcels are developed, there would be a potentially significant impact. A biological resources technical study that addresses the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The mitigation bank would generate subtidal and intertidal wetland credits to compensate for impacts under Section 404 of the Clean Water Act, the California Coastal Act, the Porter-Cologne Water Quality Control Act, and Section 1600 of the California Fish and Game Code; and for impacts on eelgrass habitat under the California Eelgrass Mitigation Policy Orange County and its watersheds. Although there will be an increase in functional wetland habitat values once the project is in operation, construction of the project may result in significant impacts. A biological resources technical study that addresses the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on federally protected wetlands. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site provides habitats for roosting, foraging, and nesting for many of the resident and migratory birds, which utilize the San Diego Bay and its surroundings. Several species were observed nesting at the project site during avian surveys conducted in 2016-2017, including black-necked stilts, western snowy plovers, burrowing owls, and killdeer (Great Ecology 2018). Additionally, the study area is proximal to San Diego Bay, including the saltworks ponds, which are part of the San Diego Bay National Wildlife Refuge immediately north and the Pacific Ocean. Additional upland habitats exist to the north and east of the project site, and the Otay River basin provides a key linkage to the inland area of southern San Diego. The Tijuana Estuary lies just 1.9 mile (3 kilometers) south. The project site's proximity to key habitats provides foraging opportunities for species that may nest or roost in the study area. Therefore, the restored areas and brine flats within the saltworks and other wetlands adjacent to the project site provide important migratory stopover value and spring/summer nesting and roosting habitats for birds. A biological resources technical study that will address the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Preliminary findings did not identify movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors or use of wildlife nursery sites on Parcels A, B, and C, with the exception of a snowy egret on Parcel C that was identified during the 2016-2017 avian surveys (Great Ecology 2018). However, given the proximity to the mitigation bank and surrounding properties that support habitats and corridors, if these parcels are developed, there would be a potentially significant impact. A biological resources technical study that addresses the proposed project's potential impacts on biological resources will be prepared and included in the EIR analysis. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. Although the proposed project occurs within the boundaries of the City of San Diego Multiple Species Conservation Program and the City of San Diego Multiple Habitat Planning Area (City of San Diego 1997), the Multiple Species Conservation Program and Multiple Habitat Planning Area do not apply to projects within the jurisdiction of the District, including the project. Further, the San Diego Bay Integrated Natural Resources Management Plan is a long-term, collaborative strategy for managing the bay's natural resources and the primary means by which the U.S. Navy and District jointly plan natural resources work in San Diego Bay (Naval Facilities Engineering Command and District 2013). The project site is located within the Integrated Natural Resources Management Plan and would be consistent with its goals and strategies for ensuring the long-term health, restoration, and protection of San Diego Bay's ecosystem. The proposed project would not be in conflict with local policies or ordinances protecting biological resources. Thus, no impact is anticipated for this criterion, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section IV (e) above.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.



V. Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
<i>a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>c) Disturb any human remains, including those interred outside of dedicated cemeteries?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site contains the Western Company Salt Works Historic District, Pond 20A, which was recommended as significant under Criterion A of the National Register of Historic Places for its role in the solar salt industry in Southern California from 1916 to present day. It was also recommended eligible for National Register of Historic Places listing under Criterion C for embodying the distinctive characteristics of a solar salt processing facility of the era (Spindrift Archaeological Consulting, LLC [Spindrift] 2018).

Therefore, a potentially significant impact is identified for this area, and the proposed project’s potential impacts on historic resources will be prepared and included in the EIR analysis and mitigation will be identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on historical resources. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. A records search performed at the South Coastal Information Center of the California Historic Resource Information System at San Diego State University. The records search results indicated that two archaeological resources have been previously documented within the project area (Spindrift 2018).

The Native American Heritage Commission was contacted on April 11, 2018, to conduct a Sacred Lands File search and received a response on April 17, 2018. The Sacred Lands File Search was negative. The Native American Heritage Commission also provided a list of individuals and organizations in the Native American community that may be able to provide information about unrecorded sites in the project vicinity. No responses were received from tribes as a result of initial scoping (Spindrift 2018).

Given the results of the records search and the moderate to high sensitivity of the project area for buried prehistoric and historic-period resources, as well as the documented presence of cultural materials across most of the project area on the ground surface, archaeological resources could be discovered during ground-disturbing activity. If avoidance of impacts is not possible for previously recorded archaeological resources, further cultural work is recommended (Spindrift 2018). Therefore, a potentially significant impact is identified for this area, and the proposed project's potential impacts on archaeological resources will be evaluated in the EIR and mitigation will be identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on archaeological resources. Potentially significant impacts have been identified, and potential impacts on archaeological resources will be evaluated in the EIR and mitigation will be identified, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. There is a potential for unknown human remains to be unearthed during earthwork activities. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.



VI. Energy

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Construction of the wetland mitigation bank would result in consumption of energy resources, including construction equipment, construction worker vehicle trips, truck haul, and material delivery trips. Operation of the wetland mitigation bank would not result in wasteful, inefficient, or unnecessary consumption of energy sources because no buildings would be constructed as part of the project, and no permanent sources of energy consumption would be constructed. Potentially significant construction impacts have been identified for this issue area, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact due to consumption of energy resources during construction and operation. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The creation of the wetland mitigation bank would not conflict with or obstruct state or local plans for renewable energy. No new sources of energy consumption would be created and, therefore, no conflict or obstruction would occur. Thus, no impact is anticipated for this criterion, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. In 2002, the State of California established its Renewables Portfolio Standard Program, of which the latest addition is Senate Bill 100, which revises the state goal to achieve 60 percent renewable energy target by December 31, 2030. Locally, the Port of San Diego *Climate Action Plan 2013* identifies strategies to reduce greenhouse gas (GHG) emissions, including on-road transportation, off-road transportation, clean and renewable energy, increased use of natural gas, and other strategies (Port of San Diego 2013). The parcels would be designated as commercial recreation or wetlands. If these parcels are developed for commercial use, there would be a potentially significant impact due to consumption of energy resources during construction and operation. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.



VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

VII. Geology and Soils

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site is not located within a State of California Alquist-Priolo Earthquake Fault Zone (City of San Diego 2008). Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

ii. Strong seismic ground shaking?

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project site is located in the seismically active San Diego in Southern California and considered likely to be subjected to moderate to strong ground motion from earthquakes in the region. The project site could be affected by the occurrence of seismic activity to some degree. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

iii. Seismic-related ground failure, including liquefaction?

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The area surrounding San Diego Bay has experienced moderate earthquake activity. The project site is located in an area of “High Potential” for liquefaction due to site characteristics, such as shallow groundwater, major drainages, and hydraulic fills (City of San Diego 2008). Liquefaction occurs when granular soil below the water table is subjected to vibratory motions, such as produced by earthquakes. With strong ground shaking, an increase in pore water pressure develops, as the soil tends to reduce in volume. If the increase in pore water pressure is sufficient to reduce the vertical effective stress (suspending the soil particles in water), the soil strength decreases, and the soil behaves as a liquid (similar to quicksand). Liquefaction can produce excessive settlement, ground rupture, lateral spreading, or failure of shallow bearing foundations. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

iv. Landslides?

Wetland Mitigation Bank – Project-level Review:

No Impact. According to the City of San Diego Seismic Safety Geologic Hazards and Faults Map (City of San Diego 2008), the project site is not located in an area prone to landslide hazards. Furthermore, the project site and surrounding area is relatively flat. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Soil erosion can result during construction, as grading and construction can loosen surface soils and make soils susceptible to wind and water movement across the surface. Erosion of soil or the loss of topsoil would be a significant impact. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Near surface soils within the project site will need to be identified to determine if the soils are unstable. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

- d) ***Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial risk to life or property?***

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Near surface soils within the project site will need to be identified to determine if they consist of soils having expansion potential. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The proposed project would not require any facilities that would necessitate septic tanks or wastewater disposal systems. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, they may require facilities that would necessitate septic tanks or wastewater disposal systems. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Many paleontological fossil sites are recorded by the City of San Diego and have been discovered during construction activities. Paleontological resources are typically impacted when earthwork activities, such as mass excavation, cut into geological deposits (formations) with buried fossils. It is not known if any paleontological resources are located on the project site. The project's potential to impact paleontological resources will be addressed in the EIR and mitigation will be identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.



VIII. Greenhouse Gas Emissions

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The proposed project has the potential to generate GHG emissions during construction, in addition to construction worker trips to and from the project site. A potentially significant impact is identified and will be evaluated in the EIR. In the long term, the project is expected to provide a benefit with respect to reduction of GHG emissions by providing a restored site with native plant material. A GHG emissions/climate change technical report will be prepared for the proposed project, and this issue will be addressed in the EIR. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The proposed project has the potential to generate GHG emissions during construction, in addition to construction worker trips to and from the project site. If these parcels are developed, the operation of commercial facilities may generate GHG emissions. A potentially significant impact is identified and will be evaluated in the EIR. A GHG emissions/climate change technical report will be prepared for the proposed project, and this issue will be addressed in the EIR. Additionally, the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. See Section VIII (a) above.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



IX. Hazards and Hazardous Materials

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. Construction of the project would involve the limited use of hazardous materials, such as fuels and greases, to fuel and service construction equipment. However, no hazardous substances are anticipated to be produced, used, stored, transported, or disposed of as a result of project construction that would pose a potential impact on the environment. The applicant will be required to comply with state laws and county ordinance restrictions, which regulate and control hazardous materials handled on site. Such hazardous wastes would be transported off site for disposal according to applicable state and county restrictions and laws governing the disposal of hazardous waste during construction and operation of the project. While further discussion and justification will be provided in the EIR, impacts are anticipated to be less than significant.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, the construction and operation of the site could involve the use of hazardous materials. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. See Section IX (a) above.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site is not located within 0.25 mile of an existing or proposed school. No impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. Based on a review of the Cortese List, conducted in September 2018, the project site is not listed as a hazardous materials site. No impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site is not located within 2 miles of a public airport. The nearest airport to the project site is the Brown Field Municipal Airport, located approximately 6 miles east of the project site. Therefore, no impact associated with airport hazards would occur with implementation of the proposed project, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The proposed project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The nature of the project as a wetland bank would not require emergency evacuation since it will not be occupied. The proposed project would be required to comply with applicable requirements set forth by County of San Diego Office of Emergency Services Operational Area Emergency Plan, City of San Diego Police Department, San Diego Fire-Rescue Department (SDFD), and San Diego Harbor Police Department. Therefore, the proposed project would result in a less than significant impact associated with the possible impediment to emergency plans. However, the EIR will provide a further discussion and justification.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, the construction and operation of the site is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would be required to comply with applicable requirements set forth by County of San Diego Office of Emergency Services Operational Area Emergency Plan, City of San Diego Police Department, SDFD, and San Diego Harbor Police Department. In addition, local building codes would be followed to minimize flood, seismic, and fire hazards. Therefore, the proposed project would result in a less than significant impact associated with the possible impediment to emergency plans. However, the EIR will provide a further discussion and justification.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The project site is located near the San Diego Bay and comprised of disturbed upland salt flats and isolated hypersaline pools perched on fill material. The project proposes neither occupation of individuals nor structures that would place individuals near wildland fires. Therefore, the proposed project would not result in exposing people or structures to a significant risk of loss, injury, or death involving wildland fires, including those adjacent to urbanized areas and where residences are intermixed. However, the EIR will provide a further discussion and justification.



Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, the construction and operation of the site would be adjacent to already established urban areas and would not expose people or structures to wildland fires. Furthermore, project facilities would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health, and safety requirements. While further discussion and justification will be provided in the EIR, impacts are anticipated to be less than significant.

X. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



X. Hydrology and Water Quality

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
iv. Impede or redirect flood flows?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project would not require waste discharge and would not interfere with ground water quality (see Section X (b) below); however the project would require excavation and dredging of tidal channels during construction. This would occur prior to the site being connected to tidal flow. During construction, measures would be taken to prevent a violation of water quality standards and waste discharge requirements and to avoid or minimize degradation to surface and ground water quality; however impacts could occur. Potentially significant impacts on surface waters will be further addressed in the EIR and mitigation identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, the proposed project has the potential to create urban non-point source discharge (e.g., synthetic/organic chemicals). Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. During construction, potable water would be brought to the site for drinking and domestic needs, while construction water may be brought to the site for uses such as soil conditioning and dust suppression. The majority of the groundwater below the project site is hypersaline and, therefore, not used for drinking water; subsequently, the project would not impact drinking water. Because the project would create a wetland mitigation bank, operation of the proposed project would not impede groundwater recharge or impede

sustainable groundwater management of the basin. Therefore, the impact on groundwater supplies would be less than significant, and no further discussion in the EIR is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, and depending on the type of development, the construction and operation of the developed parcels could potentially result in interference with groundwater recharge, depending whether grading and trenching would occur and depth required, and whether dewatering activities would be necessary. However, because of the proximity to the San Diego Bay, groundwater at the project site is anticipated to be similar to the adjacent proposed mitigation bank site, which is hypersaline from saltwater intrusion, and, therefore, it is not used for drinking water. Impacts related to lowering the groundwater table and groundwater recharge could be potentially significant and will be further addressed in the EIR and identify mitigation, when applicable.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i. Result in substantial erosion or siltation on- or off-site?

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. No impervious surfaces would be added as part of the project. The project proposes channel modification to allow tidal flows to enter the wetland mitigation bank site. During construction, erosion prevention measures would be taken, such as providing a gently sloping transition zone around the marsh perimeter. The project site currently receives its water source solely from precipitation with limited stormwater contributions; however, during operation, the wetland mitigation bank would be exposed to tidal flow and no longer be a closed system. Potentially significant impacts on stormwater drainage systems will be further addressed in the EIR and mitigation identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed as commercial facilities, the construction and operation of the developed parcels could potentially result in an increase in the amount of runoff water due to potentially introducing an increase in impervious surfaces. Potentially significant drainage pattern impacts will be addressed in the EIR and mitigation identified, when applicable.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. See Section X (c)(i) above.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Wetland Mitigation Bank – Project-level Review:

No Impact. The project would not create new impervious surfaces or contribute runoff water to an existing or planned stormwater drainage system. The project site currently receives stormwater runoff from Palm Avenue. The project would result in the creation of a wetland mitigation bank and would not result in a source of polluted runoff. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. See Section X (c)(i) above.

iv. Impede or redirect flood flows?

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. According to the Federal Emergency Management Agency Flood Insurance Rate Map for San Diego, California (Federal Emergency Management Agency 2016), the project site is located in the 100-year floodplain for the Otay River and San Diego Bay. The project has the potential to modify flood flows. Potentially significant flood impacts will be addressed in the EIR and mitigation identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed for commercial use, and depending on the location of development within the parcel, the construction and operation of the developed parcels could potentially result in the placement of structures within a 100-year flood hazard area. Potentially significant flood hazard impacts will be addressed in the EIR and mitigation identified, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The project site is not identified within a risk zone of a potential dam failure; however, the project site is within a designated high-risk zone for a tsunami (County of San Diego 2017). The likelihood that a tsunami event would occur during the 17-month construction period is low. Additionally, the project site is located near the San Diego Bay but is approximately 1.7 mile from the Pacific Ocean. Therefore, the potential for hazards associated with direct wave action in the event of a tsunami is low. Conditions under the proposed project would be similar to the existing conditions and would not increase the potential of site inundation. Although unlikely, if it were to occur during construction, people would be given sufficient warning to evacuate the project site by the West Coast and Alaska Tsunami Warning Centers, which monitor earthquakes and issue tsunami warnings when anticipated to occur. Furthermore, the project does not propose the placement of structures on the project site or pollutant sources. While further discussion and justification will be provided in the EIR, impacts are anticipated to be less than significant.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The project site is not identified within a risk zone of a potential dam failure (County of San Diego 2017). It is highly unlikely that, if these parcels are developed, the proposed project would expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam. The risk of pollutant release due to a tsunami is similar to that discussed above; however, if structures are placed on site, the risk is increased. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. Creation of a wetland mitigation bank would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan as the project would not create a new source of pollutants or impact groundwater. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, and depending on the type of development, the construction and operation of the developed parcels could potentially result in a conflict with a water quality control plan. The project site is not located within one of the four San Diego County designated groundwater basins and therefore, the project is not in conflict with a sustainable groundwater management plan (County of San Diego 2018). Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

XI. Land Use and Planning

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

a) Physically divide an established community?

Wetland Mitigation Bank – Project-level Review:

No Impact. The project would rehabilitate an existing vacant site, which includes a portion of a former salt pond. There are no established residential communities located within the project site. Therefore, implementation of the proposed project would not divide an established community, and no impact would occur. No further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. The project could develop commercial facilities on an existing vacate site. There are no established residential communities located within the project site(s). Therefore, implementation of the proposed project would not divide an established community, and no impact would occur. No further analysis is warranted.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The PMP is the guiding land use policy document for all areas under the District’s jurisdiction. The PMP provides the official planning policies, consistent with a general statewide purpose, for the physical development of the tide and submerged lands conveyed and granted in trust to the District; however, the Bank Site is not currently in the PMP. As part of this project, a PMPA will be processed and approved by the California Coastal Commission to incorporate the Bank Parcel into the PMP, which will allow the District to approve a non-appealable Coastal Development Permit for the Bank Parcel. Further, the San Diego Bay Integrated Natural Resources Management Plan is a long-term collaborative strategy for managing the bay’s natural resources and the primary means by which the U.S. Navy and District jointly plan natural resources work in San Diego Bay. The EIR will address whether the proposed project would conflict with the PMP, California Coastal Act, San Diego Bay Integrated Natural Resources Management Plan, or any other land use document adopted for the purpose of avoiding or mitigating an environmental effect.



Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The project proposes incorporating District-owned Parcels A, B, and C into the PMP and assign land use designations to Parcels A, B, and C. Parcels A, B, and C are owned by the District; however, these areas are not currently formally incorporated into the PMP. The EIR will address whether the proposed project would conflict with the PMP or any other land use document adopted for the purpose of avoiding or mitigation an environmental effect.

XII. Mineral Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site does not contain any known mineral resources. The project site and the surrounding area are not designated or zoned as land with the availability of mineral resources (County of San Diego 2011). Additionally, the project site is not identified on the California Department of Conservation Division of Mines and Geology as containing aggregate resources and is not in a mineral resource zone (California Department of Conservation 2015). Therefore, the proposed project would not result in a loss of mineral resources, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XII (a) above.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.



XIII. Noise

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project result in:</i>				
<i>a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>b) Generation of excessive groundborne vibration or groundborne noise levels?</i>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</i>				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project result in:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. The project would be required to comply with the San Diego Municipal Code Article 9.4 Noise Abatement and Control, sound level limits for construction noise (Section 59.5.0404). Nevertheless, the potential exists for construction activities at the project site to result in significant impacts. This issue will be evaluated in the EIR and mitigation identified, when applicable. No permanent increases in ambient noise are anticipated during operation of the proposed project.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. If these parcels are developed, construction activities would be required to comply with the San Diego Municipal Code Article 9.4 Noise Abatement and Control, sound level limits for construction noise (Section 59.5.0404). Nevertheless, the potential exists for construction activities at the project site to result in significant impacts. Additionally, depending on the type of development, the potential exists for operation activities to result in a permanent increase in ambient noise levels and therefore significant impacts. These issue will be evaluated in the EIR and mitigation identified, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. Groundborne vibration and groundborne noise could originate from earth movement during the construction phase of the proposed project; however, significant vibration is typically associated with activities such as blasting or the use of pile drivers, neither of which would be required during project construction. The project would be expected to comply with all applicable requirements for long-term operation, as well as with measures to reduce excessive groundborne vibration and noise to ensure that the project would not expose persons or structures to excessive groundborne vibration.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, and depending on the type of development within the parcel, the construction of the developed parcels could potentially result in groundborne vibration. Potentially significant noise impacts will be addressed in the EIR and mitigation identified, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The project site is located within 2 miles of the Naval Outlying Landing Field. However, the project is not expected to expose persons to excessive noise levels. While further discussion and justification will be provided in the EIR, impacts are anticipated to be less than significant.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. Same as above.



XIV. Population and Housing

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project site is a former salt pond. Development of housing is not proposed as part of the project. No full-time employees are required to operate the project. Maintenance of the project would involve invasive species monitoring and removal, trash removal, maintenance of site control measures, and restoration of any damage from human or natural phenomenon. Therefore, the proposed project would not result in a substantial growth in the area, as there would not be a permanent number of new employees required to maintain the site. No impact is identified for population and housing, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, it would be unlikely that new businesses in these locations would have a substantial impact on population growth due to the small size of the parcels. Impacts would be less than significant, and no further analysis is warranted.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. No housing exists within the project site and no people reside within the project site. Therefore, the proposed project would not displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere. No impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

XV. Public Services

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire Protection?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police Protection?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

i. **Fire Protection?**

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The project site is located in City of San Diego, and fire protection and emergency medical services in the area are provided by the SDFD. Two SDFD fire stations, including Fire Stations 30 (2265 Coronado Avenue) and 6 (693 Twining Avenue) are located southeast of the project site and could respond in the event of an emergency (City of San Diego 2018). According to the Fire Hazard Severity Zone Map, the potential for a major fire at the project site and vicinity is low (SDFD 2009). Based on these considerations, the project would not result in a need for fire facility expansion. A less than significant impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on fire protection because access roads to the parcels would be required to comply with SDFD's access roadway requirements, as outlined in California Fire Code Section 503. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

ii. **Police Protection?**

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. Police protection services in the project area are provided by City of San Diego Police Department and San Diego Harbor Police Department. Although the potential is low, the proposed project may attract vandals or other security risks; however, the proposed development of a wetland mitigation bank would not require an increase in police protection that would warrant new facilities. This impact would be less than significant, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. As described above, the project site is near existing police protection services and would not result in the need for a new police protection facility or any other physical impacts resulting from providing services to Parcels A, B, and C. If the parcels are developed, they would be within an urban area already serviced by existing facilities. Based on these considerations, the project would not result in a need for police facility expansion. A less than significant impact is identified for this issue area, and no further analysis is warranted.

iii. **Schools?**

Wetland Mitigation Bank – Project-level Review:

No Impact. The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Construction of the proposed project would not result in an increase in student population within the City of San Diego's School District, as it is anticipated that construction workers would commute during construction operations. The proposed project would have no impact on City of San Diego schools. No further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

iv. **Parks?**

Wetland Mitigation Bank – Project-level Review:

No Impact. The project does not propose construction of facilities that would generate the need for park use. Additionally, no full-time employees are required to operate the project. Maintenance of the project would involve invasive species monitoring and removal, trash removal, maintenance of site control measures, and restoration of any damage from human or natural phenomenon. Therefore, substantial permanent increases in population that would impact local parks are not expected. The project is not expected to have an impact on parks. Therefore, no further analysis of these issue areas is warranted.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be negligible effect on population growth, it is unlikely that new recreational facilities would be developed due to new commercial development. The proposed project would have a less than significant impact, and no further analysis in the EIR is warranted.

v. Other public facilities?

Wetland Mitigation Bank – Project-level Review:

No Impact. The project does not propose construction of facilities that would be associated with in-migration and population growth, which typically increases the demand for public services and facilities. Additionally, no full-time employees are required to operate the project. Therefore, substantial permanent increases in population that would adversely affect other public services and facilities are not expected. The project is not expected to have an impact on other public facilities, such as post offices, and libraries. Therefore, no further analysis of these issue areas is warranted.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a negligible effect on population growth, it is unlikely that new public facilities would be developed due to new commercial development. The proposed project would have a less than significant impact, and no further discussion in the EIR is warranted.



XVI. Recreation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The proposed project would not generate new employment on a long-term basis. As such, the project would not significantly increase the use or accelerate the deterioration of regional parks or other recreational facilities. The temporary increase of population during construction that may be caused by an influx of workers would be minimal and not cause a detectable increase in the use of parks. Additionally, the project does not include or require the expansion of recreational facilities. No impact will occur, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, commercial land uses do not typically generate an increase in the use of neighborhood and regional parks or other recreational facilities, such as community centers. This impact would be less than significant, and no further analysis in the EIR is warranted.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XVI (a) above.

Parcels A, B, and C – Program-level Review:

Less than Significant Impact. See Section XVI (a) above.

XVII. Transportation

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?				
Wetland Mitigation Bank – Project-level Review:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Construction of the project would result in a temporary increase of traffic to the area, which may result in a potentially significant impact. While there are no public transit, bicycle, or pedestrian facilities that serve the project site, the Bayshore Bikeway path is immediately adjacent and runs along the Otay River to the west. Additionally, bus stops on Palm Avenue serve the surrounding commercial and residential facilities. The proposed project will be evaluated to determine if its implementation would result in conflicts with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities. This issue will be evaluated in the EIR and mitigation identified, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on traffic in the area during construction and operation, and potentially conflict with adopted plans or policies relating to public transit, bicycle, or pedestrian facilities. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Construction of the project would result in vehicle miles traveled for construction worker vehicles, as well as truck haul and material delivery trips. Operation of the project would not result in an increase or decrease in vehicle miles traveled. The EIR will fully evaluate the vehicle miles traveled compared to applicable thresholds of significance and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact from vehicle miles traveled exceeding an applicable threshold of significance for both construction and operation. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project proposes construction of a wetland mitigation bank, which would not include design features that would increase hazards. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact in increased hazards due to a design feature. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

d) Result in inadequate emergency access?

Wetland Mitigation Bank – Project-level Review:

No Impact. The project is not anticipated to require road improvements and/or road closures that would impact emergency access surrounding the project site. Therefore, no impact is identified for this issue area.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on emergency access. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

XVIII. Tribal Cultural Resources

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
<i>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</i>				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. A records search at the South Coastal Information Center was conducted for to determine if any resources that may qualify as a tribal cultural resources are present within the project site. While no tribal cultural resources that are listed in in the California Register of Historical Resources were identified during the records search, the records search indicated that two archaeological resources have been previously documented within the project area and have not been evaluated (Spindrift 2018). Additionally, a Sacred Lands File Search of the project area was obtained from the Native American Heritage Commission. No Sacred Lands were identified by the Native American Heritage Commission.

Given the results of the records search, tribal cultural resources could be discovered during ground-disturbing activity. If avoidance of impacts is not possible for previously recorded archaeological resources that may qualify as tribal cultural resources, further cultural work is recommended (Spindrift 2018). Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on a tribal cultural resource defined in Public Resource Code Section 21074 that is listed or eligible for listing in the California Register of Historic Resources or in a local register of historical resources. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. A records search at the South Coastal Information Center was conducted for to determine if any resources that may qualify as a tribal cultural resources are present within the project site. While no tribal cultural resources that are listed in in the California Register of Historical Resources were identified during the records search, the records search indicated that two archaeological resources have been previously documented within the project area and have not been evaluated (Spindrift 2018). With further research, these resources may be determined by the lead agency to be significant as a tribal cultural resource. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on a tribal cultural resource as determined by the lead agency. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation in consultation with California Native American tribe(s).

XIX. Utilities and Service Systems

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

Would the project:

- a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?***

Wetland Mitigation Bank – Project-level Review:

No Impact. The project is a wetland mitigation bank that will not require water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact, potentially requiring the construction of new water, stormwater drainage, electric power, natural gas, or telecommunications facilities, depending on the development. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XIX (a) above.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact, potentially requiring water supplies, depending on the development. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. The proposed project would generate a minimal volume of wastewater during construction. During construction activities, wastewater would be contained within portable toilet facilities and disposed of at an approved site. No habitable structures are proposed on the project site; therefore, there would be no wastewater generation from the proposed project. The proposed project would not exceed the wastewater treatment requirements. A less than significant impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on the local wastewater treatment provider. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Approximately 550,000 cubic yards of soil would be excavated and disposed of off site at an appropriate facility of transported offsite for beneficial use. Per District policy and compliance with state and local requirements for waste reduction and recycling, including the 1989 California Integrated Waste Management Act and the 1991 California Solid Waste Reuse and Recycling Access Act of 1991, landfill demands would be minimized by recycling all possible materials during project construction. However, the amount of soil that would be exported to a landfill or redirected for beneficial use would be fully evaluated in the EIR.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. The parcels would be designated as commercial recreation or wetlands. If these parcels are developed, there would be a potentially significant impact on the local landfill provider or conflict with waste reduction goals. Potentially significant impacts have been identified, and the EIR will fully evaluate the potential impact and identify mitigation, when applicable.

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

Wetland Mitigation Bank – Project-level Review:

Less than Significant Impact. See Section XIX (d) above.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

XX. Wildfire

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

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

Wetland Mitigation Bank – Project-level Review:

No Impact. The project is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zone as recommended by the California Department of Forestry and Fire Protection (California Department of Forestry and Fire Protection 2009). Therefore, no impact is identified for this issue area, and no further analysis is warranted.

Parcels A, B, and C – Program-level Review:

No Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XX (a) above.

Parcels A, B, and C – Program-level Review:

No Impact. See Section XX (a) above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XX (a) above.

Parcels A, B, and C – Program-level Review:

No Impact. See Section XX (a) above.

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

Wetland Mitigation Bank – Project-level Review:

No Impact. See Section XX (a) above.

Parcels A, B, and C – Program-level Review:

No Impact. See Section XX (a) above.



Mandatory Findings of Significance

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

Environmental Issue Area:	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?				
Wetland Mitigation Bank – Project-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parcels A, B, and C – Program-level Review:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Construction of the wetland mitigation bank has the potential to temporarily impact habitat of plant and wildlife species. Further evaluation will be provided in the EIR. Additionally, there is a potential for impacts on historic and prehistoric resources, which will be further evaluated in the EIR.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. If Parcels A, B, and C are developed as commercial land use, construction and operation of commercial buildings have the potential to impact habitat of plant and wildlife species. Further evaluation will be provided in the EIR. Additionally, there is a potential for impacts on historic and prehistoric resources, which will be further evaluated in the EIR.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Implementation of the proposed project has the potential to impact several resource sections. Cumulative impacts could occur for a given resource area if closely-related past, present, and reasonably foreseeable probable future projects contribute to an incremental impact. The potential for cumulative impacts from all resource issues will be evaluated in the EIR.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Same as above.

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

Wetland Mitigation Bank – Project-level Review:

Potentially Significant Impact. Implementation of the proposed project has the potential to result in impacts related to: air quality, geology and soils, GHGs/climate change, noise, and transportation and traffic. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

Parcels A, B, and C – Program-level Review:

Potentially Significant Impact. Implementation of the proposed project has the potential to result in impacts related to air quality, geology and soils, GHGs/climate change, hazards and hazardous materials, noise, transportation and traffic, and utilities and service systems. These potential environmental effects could cause substantial adverse effects on human beings. These issues will be further evaluated in the EIR.

References

- California Air Resources Board. 2005. *CEQA Air Quality and Land Use Handbook: A Community Health Perspective*. Available: <https://www.arb.ca.gov/ch/handbook.pdf>
- California Department of Conservation. 2015. Mineral Land Classification. Available: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc> Accessed September 7, 2018
- California Department of Transportation. 2011. California Scenic Highway mapping System. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/. Accessed August 29, 2018
- California Department of Forestry and Fire Protection. 2009. Very High Fire Hazard Severity Zones in Local Responsibility Area. Available: http://frap.fire.ca.gov/webdata/maps/san_diego/fhszl_map.37.pdf. Accessed January 8, 2019
- City of San Diego. 1997. Multiple Species Conservation Program - City of San Diego Multiple Species Conservation Program Subarea Plan.
- 2008. Seismic Safety Study – Geologic Hazards and Faults. Published April 3, 2008. Available: <http://archive.sandiego.gov/development-services/industry/hazards/pdf/geo6.pdf>. Accessed September 7, 2018
- 2018. City of San Diego Fire Stations Map. Available: <https://sandiego.maps.arcgis.com/apps/OnePane/basicviewer/index.html?appid=962bc1e78f6a4473a4844e1badea1896>. Accessed September 7, 2018
- County of San Diego. 2011. General Plan, Chapter 5, Conservation and Open Space Element. Available: <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/ConservationandOpenSpace.pdf>. Accessed September 7, 2018
- 2017. *Multi-Jurisdictional Hazard Mitigation Plan*. Available: https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2017/County-HazMit-Plan-2017-Sections-1-7-with-Appendixes-BOS-Approved.pdf. Accessed September 7, 2018
- 2018. San Diego County Sustainable Groundwater Management. Available: <https://www.sandiegocounty.gov/pds/SGMA.html>. Accessed January 8, 2019
- Federal Emergency Management System. 2016. Flood Insurance Rate Map for the San Diego County, California. Panel 2153, revised April 2016
- Great Ecology. 2018. South San Diego Bay Wetland Mitigation Bank Final Prospectus, San Diego Hydrologic Unit, San Diego, San Diego County, California. Prospectus
- Naval Facilities Engineering Command and San Diego Unified Port District (District). 2013. *San Diego Bay Integrated Natural Resources Management Plan*. Final. San Diego, California. Prepared by Tierra Data, Inc., Escondido, California. Available: <https://pantheonstorage.blob.core.windows.net/environment/Integrated-Natural-Resources-Management-Plan-2013.pdf>. Accessed June 3, 2019
- Port of San Diego. 2013. *Climate Action Plan 2013*. Available: <https://pantheonstorage.blob.core.windows.net/environment/Port-of-San-Diego-Climate-Action-Plan.pdf>. Accessed June 3, 2019

San Diego Fire-Rescue Department (SDFD). 2009. Official Very High Fire Hazard Severity Zone Map. Available: <https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/maps/grid05.pdf>. Accessed September 7, 2018

Spindrift Archaeological Consulting, LLC (Spindrift). 2018. *Pond 20 Inventory Survey*. Draft. City of San Diego, County of San Diego, California.

Tierra Data, Inc. 2018. *Biological Resources Survey Report, Pond 20*. Draft. San Diego, California.