



Environmental Impact Report

Development and Environmental
Planning Division
236-6460

EAS No. 92-0647
DEP No. 92-0736
SCH No. 92111021

SUBJECT: Palm Plaza Walmart. PLANNED COMMERCIAL DEVELOPMENT PERMIT, COMMUNITY PLAN AMENDMENT, GENERAL PLAN AND PROGRESS GUIDE AMENDMENT, REZONE, RESOURCE PROTECTION PERMIT, CONDITIONAL USE PERMIT AND TENTATIVE MAP NO. 92-0736 to allow the development of a 617,000-square-foot commercial center on 59.4-acres of an 87.7-acre site. The center would be anchored by a 124,800-square-foot Walmart discount department store and a 134,900-square-foot Sam's Club membership store. An additional 232,800 square feet of retail uses are also proposed. In addition, seven commercial pads would be created as part of the Tentative Map which would allow up to 70,000 square feet of commercial uses. The project site is located south of Palm Avenue, east of Interstate 805 in the Otay Mesa community (A Portion of Section 25, Township 18 South, Range 2 West of the San Bernardino Base and Meridian in the City and County of San Diego). Applicant: Gatlin Development Company.

UPDATE:

Subsequent to public review, the proposed project and draft EIR have been revised to address issues raised during the review period. Specifically, the project has been redesigned to include relocated driveways and to eliminate one free-standing commercial pad. The revised project site plan is attached to these conclusions.

After consulting with the U.S. Fish and Wildlife Service, the applicant has selected an alternative off-site mitigation site. The EIR conclusions, analysis section and the mitigation language have been revised to reflect this change. In addition, the requirement for testing for the Riverside fairy shrimp has been included as part of the project.

The revisions to the project do not result in any new impacts or require additional mitigation.

CONCLUSIONS:

This EIR analyzes the environmental impacts for the development of the Palm Plaza Walmart project in the Otay Mesa community. Implementation of the proposed project would result in **significant unmitigated impacts to Land Use, Landform Alteration and Cumulative Biology, Traffic and Air Quality.** Significant impacts to **Traffic (direct), Biology (direct), Geology/Soils, Hydrology/Water Quality and Paleontological Resources** would be mitigated to a level less than significant.

On March 25, 1993, the Secretary of the Interior listed the California gnatcatcher as a threatened species under the Endangered Species Act. The ruling prohibits any interim "take" (harm or disturbance) to the gnatcatcher or its coastal sage scrub habitat. The proposed project contains coastal sage scrub habitat and six California gnatcatchers.

Approval of the proposed project as analyzed by this Environmental Impact Report would result in a loss of gnatcatchers and coastal sage scrub habitat and would therefore not be consistent with the interim federal "no take" rule. Further, the project design and proposed mitigation for gnatcatcher/coastal sage scrub impacts may not be consistent with a future conservation plan that would be adopted by the City, State Department of Fish and Game and U.S. Fish and Wildlife

Service. The project proponent is currently working with U.S. Fish and Wildlife Service to obtain a Section 7 or 10a permit.

Land Use

The proposed project would result in manufactured slopes up to 85 feet in height. The environmental goals of the Otay Mesa Community Plan identify minimizing landform alteration. In addition, the project would exceed the encroachment allowances allowed under the Resource Protection Ordinance.

Landform Alteration/Visual Quality

To create the necessary pad area and construct "A" Street to City design standards, a 40-foot-deep ravine would be filled and 85-foot-high manufactured slopes would be created.

Traffic (Cumulative)

The proposed project would generate approximately 43,000 driveway and 30,000 cumulative Average Daily Traffic (ADT). The intersections of Palm Avenue/"A" Street and Palm Avenue/Interstate 805 would result in a Level of Service (LOS) D during both a.m. and p.m. peak hours.

Air Quality (Cumulative)

Implementation of the proposed project would result in short-term construction related impacts and long-term mobile-source emissions which incrementally impact cumulative air quality. Project intersections operating at unacceptable levels of service would compound regional air quality problems and the non-attainment status of the San Diego Air Basin.

Biological Resources

Development of the project would result in direct and cumulative impacts to sensitive vegetation and wildlife. On site, 3.9-acres of Diegan coastal sage scrub and 1.5-acres of maritime succulent scrub would be lost as a result of this project. The habitat impacted by the proposed development is generally disturbed, having been graded during previous landfill operations on site. In addition, six California gnatcatchers and 5.3-acres of non-native grassland being used by this bird would also be lost. The loss of these habitats would also be considered cumulatively significant as a result of the loss of wetlands and raptor foraging areas. In addition, should future testing for the Riverside Fairy shrimp shows this species present on site, the loss of wetland habitat would be considered directly significant.

ALTERNATIVES FOR SIGNIFICANT UNMITIGATED IMPACTS:

No Project

This alternative would maintain the property in its present vacant condition. Under this alternative, all project related impacts would be avoided.

Development Under Existing Land Use Designation

This alternative would involve development of the site with residential units with a density of 0-5 dwelling units per acre. Implementation of this alternative would avoid the traffic and related air quality impacts. Impacts to land use, landform alteration and biological resources would be reduced under this alternative by allowing the alignment of "A" Street to be moved out of the sensitive slope and biology areas.

Modified "A" Street Alternative

This alternative would move the alignment of "A" Street further west on the site and partially reduce encroachment into sensitive slopes and biology. Impacts to landform alteration and biological resources would be reduced, but not to a level less than significant. Traffic and air quality impacts would remain unchanged.

Off-site Alternative

This alternative proposes using a property to the north of Palm Avenue known as Gateway Fair. The acreage for this site would not accommodate the full project. However, a partial off-site alternative was also analyzed. Under this alternative, the Walmart and 25 percent of the proposed commercial uses would be constructed on the gateway Fair Site. The Sam's Club and remaining commercial square footage would be constructed on northern portion of the Palm Plaza site. While traffic and air quality impacts would again remain unchanged, impacts to land use, landform alteration and biological impacts would be substantially reduced.

Unless a project alternative is adopted, project approval will require the decision-maker to make Findings, substantiated in the record, which state that: a) individual mitigation measures or project alternatives are infeasible, and b) the overall project is acceptable despite significant impacts because of specific overriding considerations.

MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

Biology

Direct biological impacts to gnatcatcher habitat would be completely mitigated with the off-site preservation and/or creation of Diegan coastal sage scrub (DCSS) and maritime succulent scrub (MSS). Mitigation would be at a 2:1 ratio and would be achieved by the preservation of 7.8-acres of DCSS and 3.0-acres of MSS in an off-site mitigation areas in the vicinity of project site. A five year monitoring and maintenance program would be included for any areas proposed for creation. In addition, if soil testing for the Riverside fairy shrimp indicates the species is present, the project would be required to comply with the requirements of the Endangered Species Act. No take of the fairy shrimp habitat would be permitted until the project applicant obtains a Section 7 or 10a permit.

Traffic

The proposed "A" Street shall be constructed as a four-lane major street between Palm Avenue and Del Sol Boulevard. Del Sol Boulevard between I-805 and "A" Street shall be constructed as a four-lane collector street. Palm Avenue shall be constructed as a seven-lane primary arterial. The intersections of Palm Avenue and "A" Street and driveways "D" and "E" shall be signalized. A complete listing of traffic mitigation measures including required lane and intersection configurations is contained in Section IV.C of the EIR.

Air Quality

Short term construction related air quality impacts would be mitigated through compliance with the Air Pollution Control District (APCD) measures and other dust control measures (See discussion in Section IV.E).

Noise

Future traffic volumes along "A" Street would result in noise volumes which exceed 65 dB(A), regardless of the project development. Future residences along "A" Street may be impacted by

adverse noise conditions. No project-specific mitigation is available for noise generation because no development currently exists in affected areas. Future projects would be required to construct necessary sound attenuation devices at the time of development.

Geology/Soils

The proposed project would be constructed on alluvium deposits, expansive soils and unconsolidated trash deposits from previous landfill operations on the site. The La Nacion Fault zone, clay and landslide deposits could adversely affect the stability of the proposed manufactured slopes. The Building Inspection Department would require the completion of a geotechnical reconnaissance prior to the issuance of building permits. Proper engineering design of the new structure would ensure that the potential for geologic impacts, from regional hazards would be insignificant.

Utilities

Facilities which provide water to the project site may not be adequate to serve the proposed development. Prior to the recordation of a final map, a water systems analysis shall be prepared to the satisfaction of the City Engineer. The analysis shall determine if any improvements are necessary and, if so, would require the applicant to install or assure that the improvements will be accomplished.

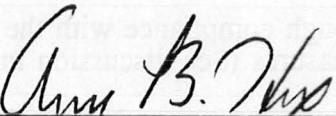
Paleontological Resources

The project site is underlain by the Otay Mesa geologic formation. The Otay Mesa formation has strong potential for containing terrestrial vertebrae remains. Approval of the proposed project shall contain a paleontological mitigation monitoring program in the Otay Mesa geologic formations to mitigate potentially significant impacts to paleontological resources. The tentative map shall include measures for a paleontologist to monitor earth movement during grading, which would allow salvaging any exposed fossil remains. Prior to the issuance of building permits, a summary report, even if negative, shall be prepared and submitted to EAS to confirm that a paleontological study has been conducted for the project. Complete paleontological mitigation measures are provided in Section IV.I of the EIR.

Water Quality

The proposed project would contribute to the urban runoff problems within the Otay and Tijuana River basins. Runoff from proposed streets and parking lots would collect pollutants such as rubber, oil, metals and trash. Mitigation measures to reduce water quality impacts would include pollution control devices consistent with the Best Management Practices (BMP) and acceptable to the City Engineer (See discussion Section IV.L of the EIR).

The above mitigation monitoring and reporting program will require additional fees and/or deposits to be collected prior to the issuance of building permits, certificates of occupancy and/or final maps to ensure the successful completion of the monitoring program.


Ann B. Hix, Principal Planner
City Planning Department

May 19, 1993
Date of Draft Report

September 09, 1993
Date of Final Report

Analyst: Milone

PUBLIC REVIEW:

The following individuals, organizations, and agencies received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency:

Federal Agencies

U.S. Fish and Wildlife Service

U.S. Army Corps of Engineers

State of California

CALTRANS, District 11

Department of Fish and Game

State Health Department

Regional Water Quality Control Board, District 9

State Clearinghouse

California Air Resources Board

Department of Transportation, Aeronautics Division

County of San Diego

Department of Health and Human Services, HMMD

Department of Planning and Land Use

City of San Diego

Councilmember Vargas, District 8

Planning Department

Engineering and Development Department

Water Utilities Department

General Services Department

City of Chula Vista, Lance Fry

SANDAG

Air Pollution Control District

San Diego Gas and Electric

Metropolitan Transit Development Board

Sierra Club

San Diego Audubon Society

San Diego Archaeological Society

San Diego Natural History Museum

San Diego Biodiversity Project

California Native Plant Society

California Regulatory Alert

Park and Recreation Board

Citizens Coordinate for Century III

Otay Mesa Community Planning Group

Otay Mesa-Nestor Community Planning Group

Otay Mesa Development Council

Otay Mesa Chamber of Commerce

Tijuana Valley/Border Planning Group

Michael Vogt

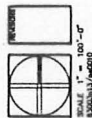
Barry Simons

Janay Kruger

Copies of the draft EIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the office of the Development and Environmental Planning Division, or purchased for the cost of reproduction.

RESULTS OF PUBLIC REVIEW:

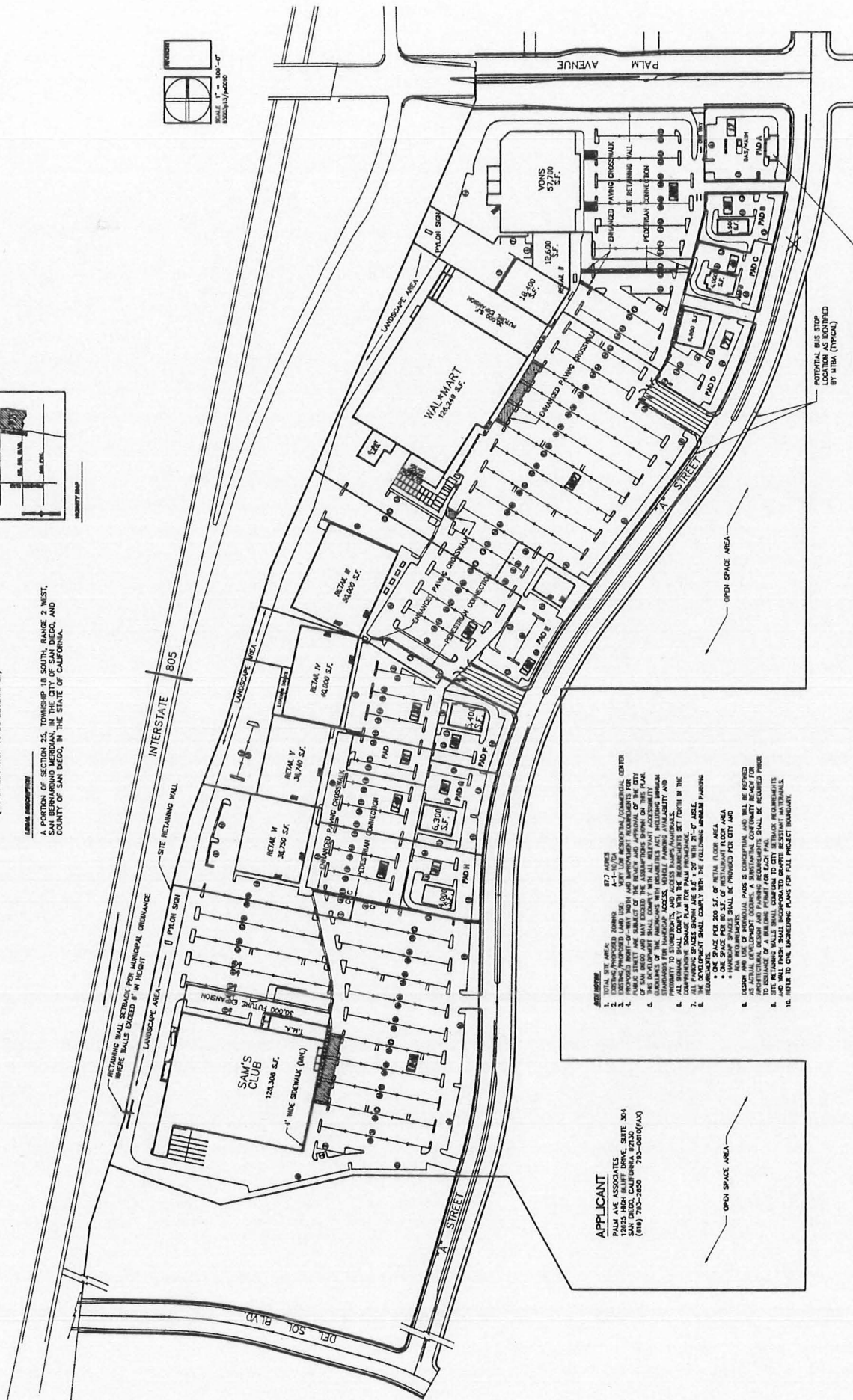
- () No comments were received during the public input period.
- () Comments were received but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. The letters and responses follow.



SCALE 1" = 100'-0"

LEARN MORE TODAY

A PORTION OF SECTION 25, TOWNSHIP 18 SOUTH, RANGE 2 WEST,
SAN BERNARDINO MERIDIAN, IN THE CITY OF SAN DIEGO, AND
COUNTY OF SAN DIEGO, IN THE STATE OF CALIFORNIA.



PALM AVE ASSOCIATES
12025 HIGH BLUFF DRIVE, SUITE 304
SAN DIEGO, CALIFORNIA 92130
(619) 793-2850 793-0510(FAX)

[illegible]

POTENTIAL BUS STOP
LOCATION AS IDENTIFIED
BY MTA (TYPICAL)

PALM PROMENADE
1-805 AT PALM AVE, SAN DIEGO, CALIFORNIA

SITE PLAN

ARCHITECTURE AND PLANNING

PROJECT NO.

8/25/93
DATE

YD-1

 $1^{\circ}-100^{\circ}-0^{\circ}$

y

SA-1

COMMENT



San Diego Gas & Electric
PO BOX 123 • SAN DIEGO CA 92112-0123 • 619-441-2300

June 30, 1993

FLENO

City of San Diego
Planning Department
Dev. & Env. Plan. Div.
202 "C" Street, MS 4C
San Diego, CA 92101

Attention: Ms. Ann B. Hix, Principal Planner

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT - PALM PLAZA
WALMART

Dear Ms. Hix:

San Diego Gas & Electric is pleased to have been given the opportunity to review the draft environmental impact report for the Palm Plaza Walmart.

1 There are no major gas facilities affecting the development. Of concern however is a 69kV electric transmission line which runs along the west side of the project that is in conflict with the project. Relocation of these facilities are costly and will be at the developer's expense. Please be reminded that access to our right-of-way must be maintained at all times and any grading or excavation work within our right-of-way must have our approval prior to start of construction.

Gas and electric distribution facilities appear to be adequate for the development at this time, however, it is impossible to predict how other proposed developments may impact the future energy demands of this project.

Should you have any further questions, please feel free to contact me at 696-2151.

Sincerely,

Kathy Babcock
Land Assistant

RESPONSE

1. The existing 60-foot electric easement is located along portions of the project's eastern boundary, as shown on Figure III-5 of the EIR. It is acknowledged that the project would be required to relocate the existing transmission line through the project site. All work will be coordinated with the assistance and consultation of SDG&E.

COMMENT

State of California

Business, Transportation and Housing Agency

Memorandum

To: STATE CLEARINGHOUSE

Date: June 29, 1993

T. Loftus

File: 11-SD-805
2.6-3.2

From: DEPARTMENT OF TRANSPORTATION
District 11 Planning

Subject: DEIR for Palm Plaza Walmart-SCH 92111021

Caltrans District 11 comments and contact persons are as follows:

- Landform Alterations/Visual Quality

The developer should provide our agency with 50-scale plans for our review of those impacts and mitigations specific to Interstate Route 805. Photo-simulations of Palm Plaza Walmart as viewed from I-805 would also be helpful for our review and comment.

Existing and future responsibilities for drainage along the length of the western boundary of this project (page IV-81) should be discussed in more detail. Will work within the right-of-way of I-805 be required? We are concerned that the structural integrity of that facility is maintained.

Plant replacement within our right-of-way should be done at a ratio of 6:1. Any work within the right-of-way for I-805 will require an encroachment permit.

- Encroachment Permits-Early and close coordination with Caltrans District 11 are strongly advised for all encroachment permit applications.

- Traffic-The Traffic Impact Study is deficient for the following reasons:

1. The study does not include an Intersection Lane Volume (ILV) Capacity Analysis for signalized intersections on a spread diamond interchange.
2. The study does not include a queue analysis for the interchange.
3. The study does not include a traffic forecast of existing traffic volumes multiplied by a 20-year growth factor.

Based on the information provided in the DEIR and the Traffic Impact Study, our agency cannot issue a permit for the proposed I-805 interchange traffic signals. It appears that the improvements required for "Interim Conditions Plus Project" are more extensive than proposed and they will require a Project Study Report (PSR).

RESPONSE

2. The project applicant intends to provide these maps.
3. The Visual Quality/Landform Alteration section of the EIR utilized cross-sections (Figure IV-8) to conceptualize the relationship of the project to the freeway. This technique is considered appropriate for the EIR's visual analysis. The use of photo-simulations would not change the EIR's conclusion that the commercial development would detract from the visual quality of the area, but not to a level of significance. For this reason, photo-simulations have not been included.
4. The project's grading plan (Figure III-3 of the EIR) shows that project grading would place a fill slope in the I-805 right-of-way near the Palm Avenue interchange. As shown on Figure IV-21 of the EIR, existing drainage facilities are located in this area. The project's tentative map would be conditioned to ensure that necessary improvements would be made to existing drainage facilities to serve the project site. Therefore, the structural integrity of these facilities would be maintained or improved.
5. Comment acknowledged. The project would be conditioned to comply with this request.
6. Comment acknowledged. The project would be conditioned to comply with this request.
7. Intersection Lane Volume (ILV) Capacity Analyses have been performed for the interchange for the three traffic conditions included in the traffic study:

- Existing traffic plus traffic for Wal-Mart Center
- Existing traffic plus traffic for Wal-Mart Center plus traffic for 1,513 dwelling units and an additional 5.5 acres of commercial development
- Long-term future (buildout) traffic

The spread diamond signalized intersection capacity analysis worksheets are on file at the City Planning Department. The number of lanes, as indicated on the worksheets, would be two through lanes plus two left-turn lanes in each direction on the bridge for the first two traffic conditions listed and three through lanes plus two left-turn lanes in each direction for the long term future traffic condition.

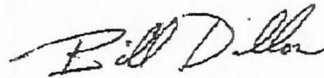
An ILV Capacity Analysis for the 20-year projection has also been prepared. The traffic estimates for the 20-year projection are on the basis that:

- At the interchange, traffic from existing development to the west side of I-805 will grow at a rate of 0.5 percent per year for 20 years. The area west of I-805 is virtually built-out and has had very little growth over the last several years. Accordingly, a growth rate of 0.5 percent per year, a growth factor of 1.105 over 20 years, is considered appropriate.
- Wal-Mart Center will be developed and Palm Avenue will be extended easterly of the interchange. Street "A" will be built between Palm Avenue and Del Sol Boulevard.
- There would be up to 1,513 dwelling units plus 5 acres of commercial/retail development on the east side of the interchange. The City of San Diego would not approve any development in the area beyond the level of 1,513 dwelling units plus 5.5 acres of commercial/retail until such time as interchange improvements were identified in a Project Study Report (PSR) by Caltrans.

COMMENT

Mr. T. Loftus
June 29, 1993
Page Two

- Contact Persons-For the environmental issue of Visual Quality our contact person is Ray Traynor, Landscape Architect, (619) 688-6738. Our contact person for encroachment permits and the initiation of the PSR is Keith Ploetner, Project Manager, Project Development Branch S-3, (619) 688-3156.



BILL DILLON, Chief
Planning Studies Branch

BD/MO:cs

RESPONSE

The 20-year traffic projection was prepared in response to the comment by Caltrans that improvements made under an encroachment permit would need to be sufficient to serve traffic for 20 years. The Caltrans encroachment permit would be to install traffic signals at both ramp terminals, to restripe the bridge to provide two left-turn lanes on the approach to each entrance ramp, and to widen the southbound exit ramp to provide three lanes. The 20-year traffic estimate described above would be applicable to this configuration.

The results of the ILV capacity analysis indicate that the interchange would operate at levels below capacity for all four traffic conditions analyzed. The ILV methodology states that if the sum of the hourly critical lane volumes is less than 1,200, the interchange would operate satisfactorily. If the sum is greater than 1,500 vehicles per hour (vph), capacity would be exceeded. If the sum is between 1,200 and 1,500 vph, some motorists would encounter some delays. Following is a summary of the ILV analysis:

<u>Traffic Condition</u>	<u>Sum of Critical Lane Volumes</u>	<u>Comment</u>
Existing Plus Wal-Mart Center	1,430 vph	Some Delays
Existing Plus Wal-Mart Center Plus 1,513 Dus & 5.5 acres Comm/Retail	1,420 vph	Some Delays
Buildout (3 thru lanes on bridge)	1,470 vph	Some Delays
20-Year Projection	1,165 vph	Satisfactory Operation

8. In discussions with Caltrans, the focus of this comment is the determination of storage length for vehicles turning left at the ramp terminals. The required left-turn storage length was determined for each of the three traffic volume scenarios listed in the response to comment #7 and for the 20-year traffic projection, for cycle lengths of 90 and 120 seconds, respectively.

Based on Caltrans design guidelines, the storage space requirements for the left-turn pockets on the bridge would not be met. For the existing plus Wal-Mart Center traffic condition, the minimum requirements might be met depending on the specific design of the pockets and the transition area between the back to back pockets. It might be appropriate to consider a design exception such that the transition area might be designed to have a shorter length than standard and the storage space might be somewhat shorter than what the Design Manual might stipulate. The City of San Diego and Caltrans have discussed and will continue to discuss possible ways of accommodating traffic under interim and build-out conditions.

The operation of the I-805/Palm Avenue interchange was analyzed further using the Passer III computer program, developed by the Texas Transportation Institute, specifically for the analysis of diamond interchanges and frontage roads. The results indicate that satisfactory operation can be achieved with any of the traffic conditions analyzed, assuming that three through lanes would be provided in each direction on the bridge. For the other three traffic conditions, two through lanes in each direction plus back to back double left turn pockets would be provided.

The results of the Passer III analysis also indicate that while satisfactory operation can be achieved for any cycle length between 80 and 120 seconds (this was the extent of the range analyzed), total delay would be minimum for a cycle length of 80 seconds. Storage space needs would be less for a cycle length of 80 seconds compared to a cycle length of 90 or 120 seconds. A signal phasing and timing strategy can be developed such that the interchange can be operated satisfactorily for any of the conditions analyzed with the amount of left-turn storage that can be provided using back-to-back left turn pockets.

COMMENT

RESPONSE

9. See response to comment #7.
10. The City of San Diego and Caltrans acknowledge that under ultimate development conditions, improvements to the I-805/Palm Avenue interchange, including a possible modification of the bridge structure, would be needed even without Palm Plaza. Caltrans is currently in the process of preparing a Project Study Report (PSR) for the Palm/I-805 interchange. This PSR will identify the final design of the interchange. The Palm Plaza project would make interim improvements for direct impacts associated with this project at the interchange (subject to Caltrans approval) and would be responsible for a fair share of the ultimate interchange improvement. All interim improvements would be consistent with the ultimate PSR design.

COMMENT

JENNIFER GOUDEAU

2082 Buena Creek Rd.
Vista, CA 92084
(619) 727-0930

July 2, 1992

Ann B. Hix
Principal Planner
CITY OF SAN DIEGO
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Re: Palm Plaza Wal-Mart
EAS No. 92-0647
DEP No. 92-0736

Dear Ms. Hix:

After reviewing the Environmental Impact Report for the Palm Plaza Wal-Mart I believe this project has several serious problems.

- 11 The environmental/biological issues are of significant importance. The California gnatcatcher is listed as threatened by the United States Fish and Wildlife Service and six were sighted on the proposed project site. The City of San Diego issued a memorandum, dated April 30, 1993, stating that until an interim conservation process for California gnatcatchers and their habitat is adopted by the USFWS and California Department of Fish and Game no impacts will be permitted. The coastal sage scrub and maritime scrub communities on the proposed project are unique to south San Diego County and would best be mitigated by preservation of similar quality habitats in the Otay Mesa area not Lakeside.

- 12 This proposed project is on or adjacent to a Natural Community Conservation Planning program unit of high conservation value and is depicted on the City of San Diego's Multiple Species Conservation Program maps as having high conservation value. It is anticipated that the Multiple Species Conservation Program will serve as the final regional conservation plan for this area and is expected to serve as a Natural Community Conservation Planning. Therefore, implementation of the proposed project prior to the finalization and adoption of these regional conservation planning efforts could jeopardize those planning efforts.

- 13 The proposed project would destroy relatively rare, for the region, wetlands and raptor foraging area associated with non-native grasslands which can not be mitigated and has been greatly diminished due to past development.

RESPONSE

11. Approval of the proposed project by the City of San Diego would not result in a "take" of coastal sage scrub habitat. The project will be required to obtain a Section 7 or 10(a) permit from the U.S. Fish and Wildlife Service prior to any action which would "take" habitat of the California gnatcatcher and, thus, will be required to meet the requirements of the Endangered Species Act.

Subsequent to the distribution of the draft EIR, the applicant has identified property in the immediate vicinity of the project site to mitigate for both maritime succulent scrub and Diegan coastal sage scrub. The applicant will acquire and preserve 3.0 acres and 7.8 acres, respectively. Mitigation measure IV.D.1 and the accompanying illustration (Figure IV-17) have been revised in the EIR to reflect the new mitigation site. The revised graphic follows this page and the new revised mitigation language is as follows:

Mitigation Measure IV.D.1: Prior to issuance of a grading permit or recordation of the final map, the applicant shall demonstrate to the satisfaction of the City Planning Director that 7.8 acres of high quality Diegan coastal sage scrub and 3.0 acres of high quality maritime succulent scrub have been preserved within the area shown on Figure IV-17. A recorded easement document or other document assuring acquisition of the mitigation acreage shall be provided to the Planning Director which defines the conditions and limitations for the use of the mitigation area. Mitigation may occur at other locations with the approval of the City Planning Director.

- As noted on page IV-58 of the EIR, preliminary biological surveys of the Lakeside mitigation site show that it contains relatively undisturbed, high quality Diegan coastal sage scrub; portions of which support the coastal California gnatcatcher. Furthermore, the site is adjacent to a large expanse of native habitat which has been identified as a high priority area in the regional open space system. However, in recognition of the benefits of accomplishing mitigation within the vicinity of the project, the project applicant has agreed to attempt to locate an alternative mitigation site. The applicant will work with the U.S. Fish & Wildlife Service to obtain approval of such an alternative site or combination of sites in order to comply.
12. Based on the MSCP map (2000:1), the site is shown as disturbed. It should be noted that the project design retains the higher quality habitat onsite in open space. While it is true that multi-species planning efforts are ongoing in the City of San Diego, it is not the City's policy to delay processing of individual projects until these planning efforts have been completed. Furthermore, CEQA does not specifically require that project approval be withheld pending completion of other planning efforts. Nevertheless, as stated in response to comment #11, the project will have to comply with conservation plans in effect at the time disturbance is proposed and would have to obtain a Section 7 or 10(a) permit from the U.S. Fish and Wildlife Service or be consistent with the forthcoming approved MSCP.
13. This comment concurs with the conclusions of the EIR. Pages IV-56 and 57 of the EIR acknowledge that the project would have a cumulatively significant and unmitigated impact associated with the loss of wetlands and raptor foraging area associated with non-native grasslands. In order to offset cumulative impacts, the applicant would contribute \$10,000 to the City's Mitigation Bank Program for cumulative impacts onsite. The above measure would not fully mitigate cumulative biological impacts.

COMMENT

14

The environmental goal of the Otay Mesa Community Plan is to develop projects to fit the land. This proposed project would require excessive grading, thus conflicting with the environmental goal of the Otay Mesa Community Plan.

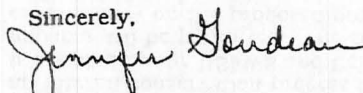
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Otay Mesa Road is a heavily traveled road and the additional traffic due to this project, with no immediate mitigation, would cause significant traffic hazards. Traffic on and the I-805/Palm Ave. interchange would be significantly increased, thus creating hazardous traffic conditions along with increased air and noise pollution.

16

Thank you for your consideration of the adverse affects this proposed project will have on our environment. This proposed project would best serve the community by implementing one of the EIR alternatives, Offsite Alternative or No Project.

Sincerely,



Jennifer Goudeau

RESPONSE

14. This comment concurs with the conclusion of the EIR. On page IV-13, the EIR acknowledges that the amount of grading proposed for the manufactured slopes along the eastern project boundary would conflict with Environmental Goals of the Community Plan relative to landform.

15. The traffic analysis indicates that I-805 and Palm Avenue would be the primary routes travelled by patrons of the proposed project. Project mitigation would require lane configuration improvement and installation of traffic signals at the Palm Avenue/I-805 interchange. These interchange improvements would foster safe driving conditions.

The EIR acknowledges that project-impacted intersections which experience unacceptable levels of service would compound regional air quality problems. Although the level of service at the I-805 ramp terminals would be LOS D under certain conditions, the carbon monoxide "hot spot" analysis concluded that CO levels would not exceed state or federal standards.

As a noise generator, the project would have a potentially significant noise impact on future residential land uses of the approved California Terraces Precise Plan near the northeast project boundary by increasing traffic noise levels on "A" Street. Future developments along "A" Street would be required to evaluate potential noise impacts from traffic along this roadway (including that of the proposed project) and would be required to mitigate potential noise impacts (see page IV-73 of EIR).

16. Comment acknowledged.

COMMENT

RESPONSE

California Native Plant Society

July 2, 1993

City of San Diego
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Attention: Ann B. Hix, Principal Planner

ENVIRONMENTAL ANALYSIS
SECTION

Comments Regarding Adequacy
Draft Environmental Impact Report
Proposed Palm Plaza Walmart Project
EAS No. 92-0647; DEP No. 92-0736

Ladies and Gentlemen:

In this letter, the San Diego Chapter of the California Native Plant Society (CNPS) provides comments regarding the adequacy of the Draft Environmental Impact Report (DEIR) for the proposed Palm Plaza Walmart Project (project) to be located south of Palm Avenue, east of Interstate 805 in the Otay Mesa community on a portion of Section 25, T18S, R2W (EAS No. 92-0647; DEP No. 92-0736; SCH No. 92111021). Please note that these comments pertain only to the DEIR prepared for the proposed project dated May 18, 1993, and noticed by the City of San Diego (City) on May 19, 1993. Unfortunately, the Biology Technical Report prepared for this project dated December 22, 1992 was not included in the materials provided to us for review. We appreciate the opportunity to provide comments on the DEIR and would hope that review material supplied to CNPS in the future include the supporting Biological Technical Studies, as clearly this is the discipline for which we will provide comments on any proposed project.

17

We would like to clarify a statement on page 1 of the City's EIR summary, last sentence in the third paragraph under Conclusions. Under the federal Endangered Species Act of 1973, as amended (Act), two vehicles are available for acquisition of a permit to allow "take" of

17. The commenter is correct in stating that this project would be applicable to solely the Section 10(a) permit process of the Endangered Species Act in the absence of Federal jurisdiction. However, a Section 7 consultation option would be available in the event a 404 permit is required.

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COMMENT

RESPONSE

California Native Plant Society

City of San Diego
July 2, 1993
Page 2

17
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a threatened or endangered species which is incidental to, but not the intent of, an otherwise lawful activity. For projects which are authorized, funded, or carried out by the federal government, such incidental take may be authorized through the interagency consultation process detailed in Section 7 of the Act. For all other projects which involve private applicants, such take can only be authorized through Section 10 of the Act. These two processes are mutually exclusive. Therefore, unless there is a federal agency permitting jurisdiction involved in the proposed project, the appropriate vehicle to allow the incidental "take" of California gnatcatcher (*Poliopitula californica californica*) would be acquisition of a "10a permit".

The majority of our comments are related to the Biology portion of the DEIR (Sub-Section D) and are referenced to specific page numbers, all in Section IV.

18

On the Biology Map (Onsite) Figure IV-15 - page 49, please correct the spelling of loggerhead shrike and San Diego County viguiera. Please correct the spelling of the species portion of the scientific name for American kestrel to *sparverius* on page 53. In addition, please correct the North indicator on Figure III-1, page III-3.

19

In the discussion of sensitive wildlife on page 53, it is stated that "...three species listed by the U.S. Fish and Wildlife Service as Category 2 candidate species, and three species listed by the CDFG as species of special concern." occur on the site. Actually, it appears that four Category 2 federal candidates are present (including the loggerhead shrike), and a total of four species of special concern are present. The current status of other wildlife species recorded from the site cannot be reviewed, because this information was not provided to us.

20

On page 54, note that the loggerhead shrike is also a Category 2 federal candidate, and that the San Diego cactus wren is also a CDFG species of special concern.

18. The EIR has been revised to reflect these corrections.

19. Comment acknowledged. The EIR has been revised to reflect this clarification.

20. See response to comment #19.

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COMMENT

California Native Plant Society

City of San Diego
July 2, 1993
Page 3

21

The first paragraph on page 56 indicates that the loss of maritime scrub would also impact snake cholla. There is no previous mention of this Category 2 federal candidate and CNPS List 1B plant's status at the project site. Does *Opuntia parryi* var. *serpentina* occur at the site? If so, please describe the distribution and abundance of this rare plant.

22

The third paragraph on page 56 states that "...the expected loss of 0.4 acres of mule fat scrub and 360 square-foot seasonal isolated wetland are not considered direct significant biological impacts." Yet, on page IX-5, it states that, "As any loss of Diegan sage (sic) scrub, wetland or maritime succulent scrub is considered significant...". Does the DEIR indicate that the loss of wetland acreage on site is a significant impact? We believe that the loss of any amount of wetlands is a potentially significant impact, and as such these losses should be properly mitigated. This loss should be evaluated under the California Environmental Quality Act (CEQA) procedure, and should not be dependent upon satisfying the jurisdictional acreage threshold of federal or state wetland protection legislation. The DEIR does correctly note the cumulatively significant impact of the loss of these wetland areas.

23

In light of the U.S. Fish and Wildlife Service's (USFWS) Proposed Special Rule to Allow Take of the Threatened Coastal California Gnatcatcher (Federal Register, Vol. 58, No. 59, 16758-16759, March 30, 1993), we believe the City's approach to compensation ratios for sage scrub habitats is inadequate. This special rule has been proposed pursuant to Section 4(d) of the Act, and would permit take associated with land-use activities covered by an approved plan prepared under the state and regional government's Natural Community Conservation Planning (NCCP) programs. Critical to the NCCP process is the interim strategy to limit loss of coastal sage scrub to 5 percent in any subregional area, identified in the Southern California Coastal Sage Scrub Natural Community Conservation Planning Draft Conservation Guidelines published June 17, 1993 by the California Department of Fish and Game. Adequate mitigation to reduce the impact of loss of coastal sage scrub vegetation to a level below significance cannot likely be developed until the local NCCP subregional plan is in place. It is not likely that the City's proposed 2:1 compensation ratio

RESPONSE

21. Snake cholla was not observed onsite but was found immediately south of the project site within existing maritime succulent scrub habitat. The likelihood of occurrence is moderate since it would have been easily identifiable. However, 100 percent survey coverage did not occur within the onsite maritime succulent scrub habitat. Therefore, snake cholla is a sensitive plant species which potentially occurs on the site. The text of the EIR has been revised to reflect this clarification.

22. The reference on page IX-5 was intended to indicate that any loss of these habitat types would at a minimum be cumulatively significant. The text has been changed to clarify this point.

As stated on page IV-57 of the EIR, although normally considered to be significant biological resource, the expected loss of 0.4 acres of mule fat scrub and 360 square-foot seasonal isolated wetland are not considered direct significant biological impacts. The mule fat scrub vegetation developed on the property as a result of the impoundment of water within a pond. After the mule fat became established, the dam responsible for holding water in the pond had been breached. As a result, no water collects in the pond. The pond is located in a small drainage course and without the dam to catch the small amount of runoff in this drainage, the mule fat scrub is expected to eventually die. Similarly, the seasonal isolated wetland is not considered a significant resource due to its small size, lack of sensitive species and isolated occurrence.

The EIR acknowledges that the wetland habitat is of low quality and unlikely to persist on its own. However, in order to offset the cumulative impact to onsite biological resources, the applicant would contribute the sum of \$10,000 to the City's Mitigation Bank Program to assist in the purchase of habitat within regional open space corridors.

23. See response to comment #11 and #12.

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COMMENT

RESPONSE

California Native Plant Society

City of San Diego
July 2, 1993
Page 4

23 cont. will satisfy USFWS requirements to issue a Section 10(a) permit, and the Section 4(d) proposed special rule will not be in place until the NCCP process has been finalized.

24 Based on the above considerations, we believe that the only way to reduce impacts to sage scrub vegetation to a level below significance is to completely avoid disturbance to this sensitive vegetation. In addition, impacts to the California gnatcatchers occurring outside of this vegetation would have to be avoided to comply with the Act's Section 9 prohibition of take.

25 If such complete onsite avoidance of sage scrub vegetation is not feasible, we believe that an adequate compensation ratio should be developed. This ratio should be much greater than 2:1. Additionally, the loss of 1.5 acres of maritime succulent scrub cannot be mitigated by replacement with Diegan coastal sage scrub. Maritime succulent scrub is actually much more limited in distribution within the United States, and as such any loss must be offset by acquisition of acreage elsewhere (if available) or revegetation/restoration/enhancement of existing, degraded maritime succulent scrub.

26 While we concur with the concept of acquiring offsite compensation acreage (when onsite avoidance is not feasible) that is of high habitat value and is contiguous with larger open areas, we believe that further biological investigations are warranted on any proposed compensation property. These studies are needed to show that specifically proposed parcels would:

- 27
- 1) replace values of resources lost (that is, would include all or most of the sensitive species to be lost),
 - 2) would satisfy the intent of the subregional NCCP and USFWS concerns, and
 - 3) would replace sensitive habitat to be lost with similar habitat (Diegan coastal sage scrub, maritime succulent scrub, seasonal wetlands, and mulefat scrub vegetation).

24. Comment noted. Pursuant to Section 15126(d) of the State CEQA Guidelines, the EIR provides an alternative which avoids impacts to sensitive biology resources. The project applicant contends that complete onsite avoidance of Diegan coastal sage scrub would not be feasible. See also response to comment #11.

25. See response to comment #11.

26. See response to comment #11.

27. Prior to the City accepting the offsite mitigation area, the project applicant would be required to demonstrate the site's ability to provide adequate mitigation including the submittal of complete biological surveys. See response to comment #22 regarding the project's cumulative impact.

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COMMENT

California Native Plant Society

City of San Diego
July 2, 1993
Page 5

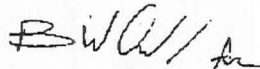
28

We believe the statement on page IV-14, "Full mitigation of the impacts to other biological sensitive resources, Diegan Coastal Sage Scrub, Maritime Succulent Scrub and California gnatcatcher...would be achieved by the applicant's proposal to preserve Diegan coastal sage scrub habitat..." is not supported by the currently proposed mitigation measures. To fully mitigate these impacts (if complete onsite avoidance is not feasible), the City should re-evaluate the compensation ratio, and include compensation acreage for the other sensitive habitats to be impacted.

oOo

Thank you for the opportunity to provide comments on the adequacy of the DEIR for the proposed Palm Plaza Walmart project in the community of Otay Mesa. The recent proposed special rule by the USFWS, and the state and regional government's efforts towards completion of the NCCP process are important actions which will likely guide land use development in our region for many years. We look forward to seeing how the City incorporates these land-use planning tools in its environmental review of this proposed project, and would appreciate receiving any final documents prepared.

Very truly yours,
San Diego Chapter, California Native Plant Society



Ms. Bernha McKinley
Chapter President

RESPONSE

28. See response to comment #11. The proposed project has been designed to avoid impacts, where feasible, to sensitive biological resources. Where impacts did occur, complete mitigation in the form of offsite preservation is provided. In addition, the applicant would be required to make a monetary contribution to the City's Mitigation Bank Program to offset the cumulative biological impacts.

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COMMENT



July 2, 1993

Ann B. Hix, Principal Planner
City of San Diego City Planning Department
Development and Environmental Planning Division
202 "C" Street
San Diego, CA 92101

Subject: Palm Plaza Walmart Draft EIR (DEP No. 92-0736)

Dear Ms. Hix:

The City of Chula Vista has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Palm Plaza Walmart project, and has concluded that the document does not adequately address the potential for impacts related to transportation, land use, air quality and growth inducement; nor does it provide mitigation to reduce these impacts to a level of insignificance. An additional comment pertaining to the impacts on biology have also been included.

In our judgment, the document has serious flaws that do not satisfy the requirements of CEQA or the adopted environmental goals of the Otay Mesa Community Plan, the Regional Growth Management Strategy or the City's Resource Protection Ordinance. Because these deficiencies have the potential to impact the City of Chula Vista, we would request the opportunity to meet with City staff to discuss these comments prior to finalization of this EIR. Our specific comments are as follows:

Transportation

29. 1. As mentioned in previous communications with the City, the City of Chula Vista remains concerned about the adequacy and continued use of the original environmental document prepared for the annexation and establishment of city zoning on Otay Mesa, in particular, the amount of industrially designated land on the Mesa and resulting analysis regarding cumulative traffic impacts. Studies have shown that there is limited capacity on the regional circulation system to serve traffic generated on Otay Mesa utilizing a less than standard rate for industrial uses (100 trips per acre). To rely on those earlier documents for ongoing project review appears flawed, as we believe they do not adequately analyze the cumulative and regional impacts of approved and pending projects on the existing and planned circulation system.

RESPONSE

29. The long-term future (build-out) traffic analysis for the proposed Palm Plaza Wal-Mart project is based on SANDAG's South Bay Area subarea model, adjusted by the City of San Diego to incorporate the current plans for land uses in Otay Mesa. The model also incorporates the transportation facilities expected to be in place to serve the build-out land uses.

An analysis in accordance with CMP requirements and regional circulation system has been conducted and is presented in the response to comment #76.

The 43,200 trips referenced represents the number of trips into and out of the driveways of the proposed Palm Plaza Wal-Mart project. Not all of these trips would be new trips. Some would be "passer-by" trips representing motorists making a stop at Palm Plaza in route to another destination. Such trips would not constitute a "new" trip on the freeway system. It is estimated that of the total 43,200 trips, about 30,200 would be "new" trips. See response to comment #32.

COMMENT

Ann B. Hix

-2-

July 2, 1993

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Furthermore, it has now been twelve years since the Otay Mesa Community Plan was adopted; and during this time, a number of community plan amendments have been approved with others pending that add significantly to the number of trips on the regional circulation system. It states on page IV-32 of the DEIR that the proposed project would add 43,200 trips to the roadway system, 37,000 of which are in excess of the community plan allocation. In our opinion, we feel this situation will be exacerbated by increasing the commercial base through the approval of the Palm Plaza Walmart project. The net result of continuing with this course of action will be high traffic volumes and resultant poor levels of service on the freeways and arterials connecting to and through the City of Chula Vista.

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2. The DEIR provides no analysis of traffic impacts beyond the project's immediate study area (i.e., intersections and roadway segments of I-805, Palm Ave., "A" Street, and Del Sol Blvd.). It states on page 26 of the Traffic Impact Study that the majority of project traffic would come from the north, via Palm Avenue. Assuming the majority of the traffic will return north, via I-805 (Figure 25 estimates 40% at pre-buildout conditions), the traffic analysis should evaluate the impact of the project's trip distribution on roadways serving the City of Chula Vista and the Otay Mesa Community Plan area. In addition, the DEIR should indicate this impact as a significant, cumulative and regional traffic impact that has yet to be evaluated.

31

Pages 1, 23, and 30 of the Traffic Impact Study report contain residential buildout estimates and related traffic demand for the South Palm Precise Plan area (Palm Ave. to I-905) and project site (Palm Ave. to Del Sol Blvd.) that are inconsistent with those used in the Land Use analysis section of the draft EIR. The numbers in the traffic study indicate there were 1,010 dwelling units (yielding 6,200 ADT) proposed in the South Palm Precise Plan assuming full buildout under the existing residential zone and that 520 of these dwelling units (yielding 4,500 ADT) are expected to originate in the Precise Plan area south of the project site (Del Sol Blvd. to I-905). In using this information to determine the number of dwelling units remaining and associated with the proposed Walmart site (490 DUs), and then comparing this number to the land use estimate referenced on page IV-10 of the DEIR (252 DUs for the project site), a significant difference exists which causes concern over both the adequacy of the land use and transportation analysis conducted for this project. Please address these differences and indicate if any impacts over and above those listed in the DEIR will occur.

32

On pages 57-60 of the Traffic Impact report, the Congestion Management Program (CMP) is briefly described and is recognized as being a required program (per state and regional statutes) that must be considered when evaluating project related traffic impacts. One of the primary purposes of this program is to improve the coordination between jurisdictional land use actions, transportation improvements and air quality programs. However, an integral component to the CMP, which is not included in this discussion or evaluated in the EIR, is the enhanced CEQA review process which is required for all "large projects" i.e., projects generating 2,400 or more average daily vehicle trips or 200 or more peak hour trips. The enhanced CEQA review process requires a local

RESPONSE

30. An analysis of the CMP facilities and the Regionally Significant Arterial System has been performed in accordance with CMP guidelines and is presented in the response to comment #76. The impacts of the proposed Palm Plaza Wal-Mart project on other arterials are not considered significant. The CMP analysis shows the impacts of the proposed Palm Plaza Wal-Mart project on other CMP and Regionally Significant Arterials (including Main Street/Otay Valley Road/Heritage Road, E Street, East H Street and La Media Roads) are not considered to be significant since project traffic would represent less than 1 or 2% of the total traffic using that facility.
31. For purposes of the traffic study, the number of dwelling units in the residential area south of the proposed Palm Plaza Wal-Mart project was estimated on the basis of the original South Palm Precise Plan and assumed that all 1,010 dwelling units referenced in the Precise Plan would be developed in the area north of Del Sol Boulevard. For the traffic study, this yields a worst case analysis in that 520 dwelling units were assumed in the area between the southern boundary of Palm Plaza and Del Sol Boulevard, plus about 450 dwelling units south of Del Sol Boulevard. Thus, the traffic analysis is based on the assumption that in the entire Precise Plan area, there would be about 970 dwelling units plus the Palm Plaza Wal-Mart project.

The land use analysis in the DEIR is based on the Community Plan which designates the entire Precise Plan area as "Low Density," with 0 to 5 dwelling units per acre. As explained on Page IV-10 of the DEIR, the estimate of 252 dus is obtained by multiplying the acreage for Palm Plaza (59.36 acres) by 0.85 to allow 15 percent of the land area for streets, then applying a density of 5 units per acre ($59.36 \times 0.85 \times 5 = 252$). The South Palm Precise Plan has not been adopted and has no official standing. Therefore, the Precise Plan was not used as the basis for the land use analysis.

The use of the yield based on the South Palm Precise Plan was chosen because it analyzed a worst case scenario for potential traffic impacts. The yield based on the Community Plan designation was used for the land use analysis to establish a plan to plan relationship.

32. The Palm Plaza Wal-Mart is considered a "large project" and is subject to the CMP requirements for an enhanced CEQA review, due to the estimated 30,200 "new" trips that would be placed on the roadway system. As explained in the response to comment #29, an estimated 30,200 "new" trips would be placed on the roadway system. An analysis of the CMP facilities and the Regionally Significant Arterial System has been performed in accordance with CMP guidelines on the following facilities; I-805, SR-905, Palm Avenue, and Otay Mesa Road, and is presented in the response to comment #76. The impacts of the proposed Palm Plaza Wal-Mart project on other CMP and Regionally Significant Arterials (including Main Street/Otay Valley Road/Heritage Road, E Street, East H Street and La Media Roads) are not considered to be significant in that project traffic would represent less than 1 or 2% of the total traffic using that facility.

COMMENT

RESPONSE

Ann B. Hix

-3-

July 2, 1993

jurisdiction, prior to taking discretionary action on a large project, to conduct an enhanced traffic analysis to ensure the analysis and mitigation for project impacts to the regional transportation system, including state highways, the regional arterial system and transit routes.

It is stated in the DEIR that the proposed project would generate approximately 43,200 ADT. As such, the proposed project should be classified as a "large project" and subject to the CMP requirements for an enhanced CEQA review. Because this project has the potential to impact roads located in the Cities of Chula Vista and San Diego by utilizing a disproportionate share of available roadway capacity, and said roads are identified in the CMP roadway system (I-805, E Street, E. H Street, Main St./Otay Valley Rd./Heritage Rd., La Media and Otay Mesa Roads, etc.), it is recommended that the traffic impact study be updated to include an enhanced CEQA review analysis that evaluates the potential for regional traffic impacts. This study should show the impact of the proposed project on the CMP system for existing and buildout conditions as it relates to existing and future growth in the City of Chula Vista. Given the potential for regional traffic impacts to occur, the EIR should list this as a potential significant impact, and include a revised discussion based on the above study, evaluating how the project meets the objectives of the Congestion Management Program.

5. The DEIR does not appear to present or reference a Public Facilities Financing Plan (PFFP) that shows how and when the facilities and improvements necessary to accommodate the project at buildout will be installed or financed. Recognizing that additional traffic impacts to the regional circulation system may be identified as a result of completing the above referenced traffic study, the preparation and submittal of an approved transportation phasing and financing plan should be made a condition of project approval.

6. The transportation analysis and circulation system evaluated in the traffic study improperly assumes completion of required off-site infrastructure improvements necessary to serve the project and Otay Mesa without having an adopted Transportation Phasing Plan (TPP) for western Otay Mesa. We feel that without an adopted TPP for western Otay Mesa, no assurances can be given through the Precise Plan process or through the approval of project-specific TPPs, that a working, regional serving circulation system will be in place or available commensurate with need.

Land Use

1. On May 25, 1993, the San Diego City Council adopted Resolution R-282046 resolving not to grant any rezones within an expanded Transborder Airport study area due to potential land use compatibility impacts resulting from a new runway alignment now under study (Runway 29). While the Resolution allows for rezoning for airport compatible uses such as commercial and industrial, an analysis with findings should be made to show that this is a compatible use. Because the proposed project site is in direct line with the flight path of runway 29, and because it may be located within the airport

33. As part of the mitigation for traffic impacts, the applicant would be required to demonstrate to the satisfaction of the City Engineer that the improvements would be assured prior to recordation of the final map. Figure IV-14 of the EIR's traffic section clearly sets out the improvements to be undertaken as part of the project. A transportation phasing plan is not proposed nor deemed necessary for the project since the City of San Diego would not approve any development in the immediate area of Otay Mesa beyond the level of 1,513 dwelling units plus 5.5 acres of commercial/retail until such time as interchange improvements were identified in a Project Study Report (PSR) by Caltrans.

34. When first opened, the proposed Palm Plaza Wal-mart project would rely on the I-805 Freeway and Palm Avenue west of I-805 for regional access. It would also be served via "A" Street and Del Sol Boulevard to the south. Subsequent residential development and the extension of Palm Avenue to the east will result in some redistribution of the traffic to and from Palm Plaza, but Palm Plaza would be a viable enterprise without the development of the street system to the east.

35. Pursuant to Federal Aviation Regulations, a Runway Protection Zone has been established for Brown Field which limits density, land use and building heights in limited areas surrounding airport runways. The project is located well beyond the existing zone or any anticipated zone associated with the Transborder Airport Study Area. Therefore, the project would not be subject to the restrictions of the Runway Protection Zone.

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COMMENT

Ann B. Hix

-4-

July 2, 1993

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influence area (area of restricted building heights and land uses) and may require mitigation such as density or FAR restrictions, a complete discussion evaluating the project's compatibility with suggested airport safety zones should be included in the DEIR.

Similar to the rationale used to preclude residential rezonings within the Otay Mesa Community Planning area (i.e., compatibility, safety, timing, and the need for a comprehensive community plan update if the airport is approved), it may be premature to consider the approval of a community plan amendment and rezone at this time, particularly since it involves such a large number of significant unmitigated impacts.

36

2. The land use section does not provide an adequate analysis of the potential jobs/housing imbalance caused by the project's elimination of residentially-designated lands; nor does it recognize that a cumulative land use imbalance already exists on Otay Mesa, as approximately 44 percent (4,310 acres) of the total Otay Mesa Community Planning area is devoted to non-residential land uses. Any increase in intensive, employment generating land uses- without off-setting increases in residential usage, will further exacerbate the existing the jobs/housing imbalance and impact Otay Mesa and the surrounding communities in terms of traffic, air quality and economics. As such, it is recommended that this discussion be expanded to include a cumulative land use impact analysis of all approved and pending projects, including the Gateway Fair commercial center and Otay Corporate Center North industrial rezone, as well as the proposed project.

Air Quality

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1. The DEIR incorrectly assumes that equivalent air quality impacts caused by vehicular emissions would occur regardless of where the project is located. This assumption fails to recognize that cumulative air quality impacts caused by localized congestion and regional traffic impacts not evaluated in this EIR may be mitigable and/or not as significant at alternate locations.

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2. Why does the DEIR not provide a comparative analysis of the increase in air quality impacts caused by the proposed project as opposed to development of the property under the existing residential land use designation?

Biology

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The DEIR states that development of the project would result in direct and cumulative impacts to sensitive vegetation and wildlife, particularly coastal sage scrub and the federally listed California gnatcatcher which occupies this and other habitat. It also recognizes that prior to gaining approval of the project, the applicant will need to obtain the necessary permits from the State Department of Fish and Game and the U.S. Fish and Wildlife Service to mitigate said impacts consistent with a future Multiple Species Conservation Plan (MSCP) to be adopted. Due to the need to adopt guidelines for

RESPONSE

36. A review of the land use allocations within the Otay Mesa Community Plan, which was undertaken by the applicant in preparing the Community Plan Amendment, updated the information contained in the original Community Plan to reflect recent plan amendments. This information is presented in the following table.

Land Use	Acres	Percentage of Total
Single-family Residential	1,290	10.31
Multi-family Residential	565	4.52
Commercial/Office	313	2.50
Retail Commercial ¹	281	2.25
Industrial	3,475	27.77
School/Park	195	1.56
Open Space	2,175	17.38
Airport	1,000	7.99
Future Growth	2,200	17.58
Institutional	166	1.33
Agricultural	600	4.80
Rights of Way	252	2.01
Total	12,512	100.00

¹ Includes Palm Plaza (60 acres)

It is important to note that the existing Otay Mesa Community Plan combines retail commercial with office and business park into one category called "commercial". The update found that of the 534 (excludes Palm Plaza) acres of land currently designated as commercial, 313 are committed to office and business park use; only 221 acres allow retail commercial. Of the 221 acres, 40 acres are designated for neighborhood commercial, 120 acres are designated as part of the commercial center and 61 acres, located within the Otay International Center, are designated for retail commercial uses.

Thus, the amount of land set aside in the community plan for retail uses is less than the 534-acre estimate for "commercial" land would suggest. The overall percentage of retail commercial land in Otay Mesa with respect to the total land area is 2.25 percent. This is not considered to be an inappropriate ratio. For example, retail commercial land based on the City of Chula Vista's General Plan would represent 2% of the total land use area at build-out. Similarly, the Otay Mesa-Nestor and San Ysidro Community Plans set aside 3.01 and 4.27 percent, respectively, of the total land within the plan areas for commercial development. The San Ysidro Community Plan indicates that a substantial amount of its commercially-designated land has historically been converted to residential use. Furthermore, the future growth area in the unincorporated eastern portion of the Otay Mesa Community Plan, which represents 17.58% of the community plan area, offers an opportunity to create residential development to fill any future shortfall which may occur in the community plan area.

The retail uses proposed by the project would generate an estimated 1,122 new jobs. Housing demand created by these new jobs can be met with the existing housing stock in the area. Furthermore, the site is accessible from surrounding residential areas.

COMMENT

Ann B. Hix

-5-

July 2, 1993

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habitat preservation and impact mitigation necessary for establishing a common base for implementation of the MSCP, and the importance of exchanging information about the demand, supply and biological value of mitigation lands, the City of Chula Vista recommends that the Final EIR provide a complete discussion and consistency analysis as to how the project's impact and mitigation areas relate to the draft MSCP studies.

Growth Inducement

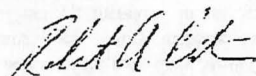
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The discussion, analysis and conclusion that the project will not have significant growth-inducing impacts appears to be focussed on the project itself within the Otay Mesa community planning area, east of Interstate 805. Would not a commercial center of this size, particularly one that is located opposite another planned commercial site (Gateway Fair), have the potential to induce additional and/or more intensive growth to the area west of I-805, including the surrounding planned environment? Because the proposed project will extend and/or expand off-site infrastructure that will benefit surrounding lands and contribute incrementally to the local and regional economic activity, a cumulative analysis of growth-inducing impacts on the existing and planned environment should be added to this section.

Thank you for the opportunity to present our comments on the Draft EIR. We would be happy to meet with you and discuss these concerns in greater detail prior to the finalization of the EIR.

If you have any questions or require clarification regarding our comments, please do not hesitate to contact our office at 691-5101.

Sincerely,



Robert A. Leiter
Director of Planning

RAL:LF

cc: John Goss, City Manager
George Krempf, Deputy City Manager
Chris Salomone, Community Development Director
Cliff Swanson, City Engineer
Ernest Freeman, Planning Director, City of San Diego

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RESPONSE

37. The model URBEMIS3 was used to calculate project-related vehicular emissions. This model assumes average commercial activity trip lengths throughout San Diego County as the basis for vehicle miles travelled (VMT) generation. Therefore, the VMT estimate will be identical for the same project located anywhere in San Diego County. Regardless of location, the project would incrementally contribute to the non-attainment status of the San Diego Air Basin. In addition, based on the CO "hot spot" analysis, the project would not exceed State and Federal standards on CO and therefore would not result in significant direct air quality impacts.

Congestion effects enter into the modeling process through the travel speed selected. It is unlikely that any other alternate location is available with similar freeway access that would change the average travel speed by more than 5 mph which is the speed resolution of the URBEMIS3 model.

38. A comparison of the effects of the proposed project with that which would occur under the current residential land use designation on the property is made in the alternatives section of the EIR on page IX-4. To further clarify significant air quality impacts relative to the RAQS, the discussion of air quality impacts of the residential use alternative has been revised in the Final EIR as follows:

"Residential use of the property would decrease the number of trips by over 27,000 ADT. This reduction in automobile trips would result in a proportional reduction in the air emissions contributed to the San Diego Air Basin by the project site. The net effect of this change would be minor due to the small percentage of the total automobile trips in the air basin represented by the 27,000 ADT reduction. There would be no localized CO benefit resulting from this alternative since the proposed project would not create significant CO levels in the project vicinity.

Eliminating the proposed retail center from this site would not eliminate the air emissions related to trips by local residents to acquire goods and services. As discussed in Section IV.E of the EIR, the proposed retail center would not represent a new emissions source.

39. The City of San Diego's Multiple Species Conservation Program (MSCP) is being developed as a mitigation measure for impacts associated with the Clean Water Program. The MSCP is intended to identify and protect key habitat areas on both private and public land. The project site is located within the study area of the MSCP; however, final preserve boundaries have not been adopted for the MSCP, nor have preserve boundaries been designated within the project site. Draft studies prepared for the MSCP have delineated disturbed grassland, disturbed habitat, disturbed coastal sage scrub, coastal sage scrub, and a developed area (landfill) on the project site. The mapping was done at a gross scale (2000:1 inch) and will not be relied upon to delineate final, preserve boundaries. Although the MSCP plan is only in draft stage, the project's impacts have generally been assessed against overall goals of the MSCP. See response to comment #11 and #12.

40. Commercial uses are not typically growth-inducing but are growth-accommodating. As discussed in response to comment #36, housing opportunities currently exist to the west and the jobs would not create a demand sufficient to induce growth in Otay Mesa. The project is not anticipated to induce significant additional growth to the areas west of I-805 since these areas are currently developed and urbanized.

COMMENT

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July 1, 1993

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Ms. Ann B. Hix, Principal Planner
CITY OF SAN DIEGO
DEVELOPMENT AND ENVIRONMENTAL PLANNING DIV.
CITY ADMINISTRATION BLDG.
202 "C" Street, MS 4C
San Diego, CA 92101

Re: EAS No. 92-0647 - DEP No. 92-0736
Palm Plaza Walmart

Dear Ms. Hix:

We have reviewed the subject draft EIR ("DEIR") and would like to submit the following comments:

1. The DEIR concludes that the only significant unmitigated impacts to "land use" relate to the environmental goals of the Otay Mesa Community Plan.

There are other land use impacts which have not been addressed at all by the DEIR. The document indicates that a .33% reduction in the total estimated dwelling units of the Otay Mesa Community Plan and a corresponding increase of almost 17% over the original commercially designated land in the Plan will not constitute a significant land use impact. Further, Table S-2 on page S-12 indicates that the proposed change in land use designation would not have any impact on existing or planned housing in the community plan area. (Emphasis Added)

RESPONSE

COMMENT

Ms. Ann B. Hix
July 1, 1993
Page 2

41

A .33% (or a 252 dwelling unit) decrease in the total estimated dwelling units and a 17% increase in commercially designated land will result in significant unmitigated land use impacts.

42

The text of the DEIR does not appear to contain enough discussion of the direct and cumulative land use impacts of this project on the Otay Mesa Community Plan area. Changing this area from residential to commercial may reduce the viability of the proposed 200-acre commercial center in the Plan. In addition, traffic patterns will substantially change throughout the community. New infrastructure requirements and modified impact fees will result following the implementation of the project. We believe there should be more analysis as to the viability of the remaining commercial acreage not only throughout the Plan, but also as it relates to surrounding commercial uses, and the 200-acre commercial center.

43

Economic considerations can also directly result in environmental impacts which need to be considered in the approval of any substantial land use change. This is especially true where there is a proposed land use change from residential to commercial, directly across the street from an already approved

RESPONSE

41. Significant land use impacts are typically associated with the relationship of incompatible land uses, conflicts with land use plans or ordinances, and consistency with adopted environmental goals of the community or general plan. These land use issues were addressed in Section IV.A of the EIR. The fact that the project would result in a 0.33% decrease in the total estimated dwelling units and a 17% increase in commercially designated land would not result in significant land use impacts. See response to comment #36.

42. No development has occurred in the Town Center area. According to Section 15131 of the CEQA Guidelines, "Economic or social information may be included in an EIR or may be presented in whatever form the agency desires." There is no mandate in CEQA that economic or social information be included in an EIR. Furthermore, according to Citizens Association for Sensible Development of Bishop Area v. Inyo (1985) 172 Cal. App. 3d 151, the court held that "economic or social change may be used to determine that a physical change shall be regarded as a significant effect. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment." Thus, socio-economic effects need not be considered if the effects would not result in a physical change in the environment (See response to comment #36).

As addressed in the traffic analysis, traffic patterns would not change substantially in the Otay Mesa Community Plan area with changes occurring primarily in the project vicinity. The impacts of the project as the Otay Mesa area is built out have been addressed in the traffic report prepared for the EIR. New road improvements and water/sewer supply improvements are identified in the EIR as necessary to support the project and would be required to be assured as conditions of project approval (refer to Mitigation Measures IV.C.1 - IV.C.4 and IV.H.1 - IV.H.2). Further, it is not the intent of CEQA to assess market factors in siting development with competing uses.

43. See response to comment #42.

COMMENT

RESPONSE

Ms. Ann B. Hix
July 1, 1993
Page 3

43
cont.

neighborhood and community serving commercial center (the Gateway Plaza project).

The objective of the proposed project as set forth on page 3-1 indicates that the project would provide a regional shopping center to serve Otay Mesa and the surrounding communities and be anchored by Walmart and Sam's Club. It also indicates that additional commercial space would be available for lease to a variety of users.

It is our understanding that one of these "additional commercial uses" is a proposed supermarket. As the Planning Department is aware, the Gateway Plaza project, immediately across Palm Avenue to the north, has an approved PCD which required that a supermarket and "in-line" shops be provided at the center. Implementation of the Palm Plaza project may result in an overabundance of a particular use (the proposed supermarket and "in-line" shops) for which there is not currently enough demand. The level of residential development at this time is not sufficient to support two supermarkets and an overabundance of "in-line" shops.

COMMENT

RESPONSE

Ms. Ann B. Hix
July 1, 1993
Page 4

44

We believe that the economic and land use impacts associated with this overabundance need to be studied and analyzed as part of the EIR.

44. See response to comment #42.

45

A potential mitigation measure or perhaps a project alternative should be identified which would either delete or delay the implementation of the supermarket and "in-line" shops to a future phase. This deletion or delay would reduce or avoid adverse and significant impacts which will result from the overabundance of supermarket uses within this immediate area. A mitigation measure which could be a condition on the approval of the Palm Plaza project could be inserted in the PCD to restrict the issuance of a building permit and the development of a supermarket and the "in-line" shops until there is sufficient residential development on Otay Mesa (70% of the allocated residential density) to support a second supermarket complex.

45. See response to comment #42. This mitigation/alternative is not necessary.

46

An alternative or project-related mitigation which would delete the supermarket and inline shops (approximately 100,000 square feet) is reasonable since the basic objectives of the project can still be attained. In addition, the project would still retain approximately 232,800 square feet for additional large box type commercial uses. This alternative, or proposed mitigation measure, may result in the following: 1) a reduction

46. See response to comment #45.

COMMENT

RESPONSE

Ms. Ann B. Hix
July 1, 1993
Page 5

46
cont.

to the land use impacts; 2) a possible site layout modification which would reduce visual impacts along I-805; 3) a modified grading plan which would further reduce the significant and unmitigated land form impacts; and 4) a reduction in overall traffic and air quality impacts.

47

As the Planning Department is aware, the Gateway Plaza was not allowed to have grouped structures along I-805. In addition, landscaping breaks between buildings were required. These same design standards and visual impact mitigation measures should be required of the Palm Plaza project.

48

2. Visual impacts along I-805 and also along Palm Avenue have not been sufficiently addressed or mitigated. Site specific mitigation measures should be required to address the significant visual impacts.

As previously mentioned before, grouped structures along I-805 should be prohibited and landscape breaks between buildings should be required.

49

3. Permitted signage along I-805 and Palm Avenue should also be consistent with the requirements mandated for the Gateway Plaza project.

47. The proposed project would mitigate visual impacts to a level less than significant with landscaping and site design. Additional landscaping above that required may be offered by the applicant but would not be considered as mitigation.

48. See response to comment #47.

49. Signage requirements for the project must be consistent with the City-wide ordinances and policies regarding signs.

COMMENT

Ms. Ann B. Hix
July 1, 1993
Page 6

If special treatment and/or consideration is to be granted to the Palm Plaza project, Gateway Plaza should also be entitled to such special treatment and additional signage.

In summary, the direct land use impacts associated with this project must be addressed. Analysis of the overabundance of a particular type of use (supermarkets) within an undeveloped community will result in a land use impact. This is especially true where there is a proposed land use change from low density residential to a very high intensity regional commercial use. An alternative project should be analyzed in the EIR which deletes from permitted uses the proposed supermarket and small "in-line" shops. As an option, a mitigation measure could be mandated to phase in the supermarket and "in-line" shops in accordance with the residential build out of the community. This phasing condition should be included in the Planned Commercial Development Permit since one of the aspects of the review and approval of a Planned Commercial Development is "a comprehensive review of multiple phased commercial uses". (Emphasis Added)

In addition to the substantive comments above, the following comments relate to technical questions and comments regarding the draft EIR.

RESPONSE

COMMENT

RESPONSE

Ms. Ann B. Hix
July 1, 1993
Page 7

50 1. The public notice of draft EIR subject description contains a variety of square footages which do not appear to add up to 617,000 square foot commercial center. There may be a typographical error or other uses which have been omitted from this brief description. This same comment relates to the text and charts contained within the DEIR.

51 2. The description of the Gateway Fair project on page 4-1 does not reflect the fact that a major grocery store will be included within the project. In addition, the motel may be replaced with a movie theater which was contained within the original conditions of approval.

52 3. A notation (or other key note) should be made on page 4-2 reflecting the location of the Gateway Plaza project.

53 4. At the top of page 4-12, a conclusion is reached. That "no land use impact would occur to the North, as this area is already designated for similar commercial development." In addition, on page 4-14, that no significant impacts will occur with respect to the loss of residential land compatibility with existing and planned land uses or operation of Brown Field. As previously indicated, we conclude that the overabundance of supermarket uses and the "in-line" shops would result in a

50. The exact commercial square footage of the project is 617,900 SF. The text of the project description states that the project proposes approximately 617,000 square feet of commercial use.

51. Comment acknowledged.

52. Figure IV-2 portrays the location of Gateway Plaza, also known as Gateway Fair.

53. See response to comments #36.

COMMENT

Ms. Ann B. Hix
July 1, 1993
Page 8

53
cont.

significant unmitigated land use and possible unmitigated economic impacts.

54

5. Table 4-3 on page 4-34 contains a footnote #1, but does not have a corresponding footnote on the chart. The residential traffic counts should be included on the table as a comparison to the project trip generation calculations.

55

6. As previously indicated, we believe that a new alternative should be proposed which would either delete approximately 100,000 square feet (the proposed supermarket and "in-line" shops) or phase the implementation of the supermarket and "in-line" shop uses until the Community Plan has reached at least a 70% build out of the residential capacity.

56

7. Page 4-43 indicates that the Palm Plaza overpass is a mitigation measure which is not currently proposed by the applicant. The traffic impacts at this particular section of the Community Plan are significant and unmitigated. We believe that this impact should be addressed up front and not delayed for a future project study report which CalTrans may or may not perform. Since the Palm Plaza project will result in this significant unmitigated impact, it should bear the burden of any mitigation measures to address this impact.

RESPONSE

54. Footnote #1 refers to the "Build-out without Project" heading of Table IV-4. This column provides traffic volumes based upon development of the site consistent with the current residential community plan designation.

55. Socio-economic effects have been determined to not result in any significant physical changes in the environment and consideration of this alternative is not necessary (See response to comment #36).

56. See response to comment #10.

COMMENT

Ms. Ann B. Hix
July 1, 1993
Page 9

RESPONSE

57

8. The landscaping contained within Figure 3-4b on page 3-11 seems to show that there is very sparse landscaping along I-805. It appears that the overall landscape plan contemplates "Alternative Compliance" rather than meeting strict requirements of the Citywide Landscape Ordinance. Is alternative compliance something that the applicant has applied for?

58

9. The site layout indicates that there is linear placement of buildings along I-805 which is in direct conflict with the recommendations of the Community Plan to "avoid repetitive linear placement of buildings."

59

10. Page 4-82 indicates that there is a 36" water line proposed in Palm Avenue. Is this a typographical error or is such a large line mandated by this project?

60

11. It would appear that Note #1 under Table 4-1 is inconsistent with the conclusions of the second paragraph under Significant Impacts on page 4-14.

61

12. The extra lane in the westbound direction (page 4-31) would require Palm Plaza to dedicate additional right-of-way and realign Palm Avenue. We assume that this additional right-of-way and realignment is a requirement of the Palm Plaza project and

57. The landscape plan in the EIR is conceptual and, thus, does not identify the location of each plant. Precise location and description of plantings would be contained in the final landscape plans for the project. This comment does not reflect upon the accuracy or adequacy of the EIR.

58. As shown on Figure III-5, the buildings would be clustered into three groupings and the elevations within each grouping along I-805 would be staggered to avoid a uniform linear orientation.

59. The 36-inch diameter is correct. The size of this waterline was a condition of the Gateway Fair project and is sized to accommodate future development to the east.

60. Footnote #1 of Table IV-1 is referring to the southern offsite improvements of "A" Street and Del Sol Boulevard. The text is referring to portions of the site east of "A" Street.

61. The extra westbound lane (fourth lane) was required in order to provide an acceleration-deceleration area for the right-turns-only driveway on Palm Avenue for Gateway Fair. Without the extra lane, the City would have considered the driveway undesirable from an operational standpoint. The City of San Diego expects that the north curb line of Palm Avenue in front of Gateway Fair will remain as designed in the approved plans for Gateway Fair. Any additional right-of-way requirement along the south curb line would be the responsibility of Palm Plaza.

COMMENT

Ms. Ann B. Hix
July 1, 1993
Page 10

61
cont.

therefore will not result in any additional liability or exposure to surrounding properties.

We believe that the current DEIR is incomplete and does not address all of the significant impact issues and we would appreciate you addressing these issues in a revised and recirculated EIR. Thank you for your courtesy.

Sincerely,

PETERSON & PRICE
A Professional Corporation

Matthew A. Peterson
Matthew A. Peterson

cc: GATEWAY PLAZA PARTNERS

RESPONSE

COMMENT

RESPONSE

Pardee Construction
Company

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July 1, 1993

Ann B. Hix, Principal Planner
The City of San Diego
Planning Department
202 C Street
San Diego, Ca 92101

Subject: Comments to Palm Plaza Wal-Mart Draft EIR
EAS No. 92-0647 and DEP No. 92-0736

Dear Ann:

Pardee Construction Company has reviewed the Palm Plaza Draft EIR and would like to offer several comments. We are obviously interested that the Palm Plaza project be properly planned since our project, California Terraces, adjoins its eastern boundary. We are pleased to find that the applicant has for the most part coordinated their project with California Terraces. While in general the EIR has adequately discussed impacts from the project, there are several items which should be addressed in further detail.

LAND USE

62 Although our precise plan and several others have been submitted to the City for a number of years, the property-owner for the designated Town Center site has not initiated planning efforts despite the City's continuing interest. Several years ago, the City Architect's Office and Planning Department held several workshop sessions promoting ideas to achieve a well-designed project. It appears that a commercial area is being created at Interstate 805 and Palm Ave. Approval of Palm Plaza may delay the need for the designated Town Center, including construction of the type of public facilities which are integral parts of a Town Center concept. As such, it may be appropriate for Palm Plaza to include some of the public facilities envisioned for the Town Center within Palm Plaza. Will the draft EIR evaluate the impact of relocating these facilities?

62. See response to comment #36. Any decision to locate public facilities in the Palm Plaza project would be at the discretion of the City.

COMMENT

RESPONSE

Ann Hix
Planning Department
The City of San Diego
San Diego, CA

- 2 -

July 1, 1993

63 Both Palm Plaza and the approved Gateway Fair project will serve as gateways (as the name implies) to the Otay Mesa residential community. It is important that these two projects be well conceived and executed, as they will serve as the entrance to the larger community. Consequently, it is appropriate to give special consideration to the architectural, site planning and landscape treatments, particularly as viewed from I-805 and Palm Ave. Will these design considerations be evaluated with respect to the prominent visibility of the site?

64 In addition, Palm Avenue's appearance is important, since it is a major access to Otay Mesa. Therefore, use of landscaping in the median should be required in lieu of paving wherever practical.

LANDFORM ALTERATION/VISUAL QUALITY

65 Several of the planning areas within California Terraces will have views of the proposed project. While the vertical and horizontal separation of California Terraces from Palm Plaza will provide an adequate buffer between the two different land uses, visual impacts can be avoided. Will the conditions of the Planned Commercial Development Permit and mitigation monitoring program include language somewhat comparable to the following?

"All exterior rooftop equipment, including HVAC, access ladders, vents, stacks, storage tanks, communication antennas and satellite dishes shall be completely screened from view. All screening materials shall be identical in color, texture and material to the exterior walls. Ground-mounted equipment and other auxiliary structures shall be screened from view in the same manner."

66 The Tentative Map shown in Figure III-5 accurately shows some, but not all, of the proposed California Terraces grading. Since the DEIR has been released, we have worked with the applicant to coordinate the two land use plans, and urge continued cooperation. Our coordination has included showing all of the California Terraces grading on the Palm Plaza plan, together with storm drainage.

63. See response to comment #47. Building plans for the project have not been finalized. However, since the project is proposed to be a Planned Commercial Development (PCD), it would be subject to design criteria of the PCD Ordinance. The design criteria requires the project to be compatible with existing and planned land use on adjoining properties. In addition, the ordinance requires that architectural harmony with the surrounding community be achieved as far as practical.

64. The project proposes landscaping within the medians of both Palm Avenue and "A" Street.

65. See comment #63. The project would be subject to screening standards contained in Section 101.0910.E.5. of the PCD Ordinance. Prior to building permit issuance, building plans would be reviewed to ensure that rooftop equipment and appurtenances are properly screened.

66. Comment acknowledged. The City Engineer would also review the project grading plans to ensure project compatibility.

COMMENT

Ann Hix
Planning Department
The City of San Diego
San Diego, CA

- 3 -

July 1, 1993

UTILITIES

Water

67. The City Water Utilities Department has been requiring the first project which reaches the final design stage to update the water study for the 490 and 680 zones. It would appear this project should be subject to the same requirements, which could involve major initial facilities including a reservoir and/or large-diameter transmission main. Phasing, major facility locations and financing should be coordinated with the other affected major landholders in the 490 and 680 pressure zone service areas. Will this requirement be imposed upon the Palm Plaza project approval, as the rest of the projects have been conditioned?

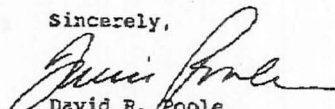
MISCELLANEOUS

68. Page IV-12 of the EIR states the project will shield parking and security lighting. We assume this is the reason why impacts from "light, glare and shading" were found not to be significant. Will the conditions of approval of the PCD include language similar to the following?

"Any outdoor lighting facility or fixtures shall be shielded, be equipped with automatic timing devices and be limited to the amount of light necessary for the purpose. Lighting which is not for security purposes shall be shutoff after 10 PM."

We appreciate the opportunity to comment on this draft EIR.

Sincerely,


David R. Poole
Project Manager

DRP:sgo

cs: K. Keeter, Project Design
M. Madigan, Pardee Construction
J. Ponder, Sparber, Ferguson, et al
L. Sherwood, RECON

RESPONSE

67. As stated in mitigation measure IV.H.1, the project applicant would be required to update the "Water System Analysis of Two Transmission Alternatives for the South San Diego/Otay Mesa Service Areas," prepared by Boyle Engineering in September, 1990, to the satisfaction of the Water Utilities Director.

68. Light and glare were determined to be not significant. The inclusion of the measures identified in the comment could be included as a condition of the PCD but would not be required as environmental mitigation.

CONFIDENTIAL

CONFIDENTIAL

COMMENT

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July 2, 1993

VIA MESSENGER

Ms. Ann B. Hix
Principal Planner
City of San Diego
202 "C" Street, MS 4A
San Diego, California 92101

Re: Palm Plaza Walmart, EAS No. 92-0547, DEP No. 92-0736

Dear Ms. Hix:

The purpose of this letter is to provide you with written comments regarding the above-referenced draft Environmental Impact Report ("DEIR"). These written comments are presented on behalf of our clients, Otay International Center ("OIC"), the property owners and developers of approximately four hundred fifty (450) acres of property surrounding the second international border crossing on Otay Mesa, known as the International Center.

The DEIR addresses a number of significant environmental impacts that would occur if the Palm Plaza development ("Development") is approved and constructed. A number of the significant environmental impacts may be mitigated while others cannot be mitigated. Thus, the Development will cause significant unmitigated environmental consequences. It appears that the DEIR, for the most part, accomplishes the goals of the California Environmental Quality Act and its guidelines. However, there are areas that require additional review and discussion.

Section 9 of the DEIR, entitled Alternatives to the Proposed Action, should be enhanced with additional discussion and analyses. For example, only one off-site alternative property was analyzed. The thirty-one (31) acre Gateway Fair site was not a good example nor a fair comparison, since the Gateway Fair site is substantially smaller [thirty-one (31) acres versus fifty-nine point four (59.4)

RESPONSE

69. The full-offsite and partial-offsite alternatives were selected on the basis of their ability to achieve the basic objective of the project as well as minimize environmental impacts. The Gateway Fair site was selected because it met the project's objective of locating a shopping center in the Otay Mesa area which would be positioned to serve the future needs of Otay Mesa and have an existing market area (residential development to the west) to support the shopping center in the interim. In addition, the site has been partially graded and, thus, has diminished resource value. The partial-offsite alternative was considered as a means to overcome the land area shortfall of the Gateway Fair property by utilizing the existing disturbed portions of the Palm Plaza site.

As part of the preliminary marketing research, the applicant conducted a search of the Otay Mesa, Nestor and San Ysidro areas. In the course of this search, a number of sites were considered including the Otay International Center (OIC) and San Ysidro areas. The applicant rejected sites in these areas as not economically viable. Three sites, in particular, were considered: Simons property, OIC and the central commercial area in the Otay Mesa Community Plan.

The Simons site consists of approximately 50 acres located within San Ysidro, on the south side of Camino de la Plaza. It is currently designated for commercial use. While the site nearly meets the size criteria, the applicant rejected the site because it has poor access and is reliant on the economic vitality of another country. Since the site would draw a substantial amount of patronage from across the border, future commercial uses would be subject to the economic fluctuations of the Mexican economy.

Finally, the central commercial area, known as the Town Center, at the intersection of Otay Mesa Road and proposed I-905 was considered but rejected for reasons similar to OIC. The central commercial area consists of a total of 90 acres divided into at least four ownerships with the largest parcel about 20 acres. Although no single parcel would be large enough to support the proposed center, the center could be located on either side of Otay Mesa Road in a manner similar to the partial-offsite alternative considered for Gateway Fair. However, as with OIC, the site lacks the necessary population base to support the project in the near-term and future population growth is questionable due to the previously mentioned airport moratoriums.

Although the name appears to allow retail commercial, the 230 acres of Specialized Commercial land within the Otay Mesa Development District does not allow retail commercial uses. In addition, as with OIC and central commercial areas, the Specialized Commercial land lacks the market population to support the project.

COMMENT

Ms. Ann B. Hix
July 2, 1993
Page 2

RESPONSE

69
cont.

acres]. Alternative off-site properties that would offer the ability to accomplish the Development should have been included in this analysis. For example, OIC has a significant amount of improved property which could be utilized for the Development as presently envisioned. In addition, there exists the opportunity for the Development to be located in the San Ysidro area of the City at the northwest quadrant of I-5 and Camino De La Plaza [fifty (50) plus acres].

The DEIR should also have discussed potential secondary environmental effects as a result of economic and social changes. The Development, which contemplates a large commercial center [six hundred seventeen thousand (617,000) square feet] will have a regional impact on other previously planned and zoned commercial properties.

We are informed that the City of San Diego has expended over ONE MILLION DOLLARS (\$1,000,000.00) to encourage the success of an Enterprise Zone created in the San Ysidro area. The potential relocation of businesses and patrons to a proposed regional commercial center, represented by the Development could prove irreversibly damaging to the City's efforts.

70

Similarly, OIC has expended millions of dollars to assist the City in developing Otay Mesa. Not the least of which was the financing and construction of the Otay Mesa Sewer Trunk Line. This public improvement permitted development of Otay Mesa to become a reality. OIC has relied on the Otay Mesa Community Plan in planning its property. The International Center includes a number of acres of retail commercial zoning. The location of a regional retail center at the Development site could have the same consequences as those described for San Ysidro.

OIC, the San Ysidro area, and we submit the City, because of its Enterprise Zone, have all relied on the Otay Mesa Community Plan in their respective planning. This collective planning certainly did not contemplate another large regional commercial development in a previously planned residential area. This change, at this late date, could cause secondary environmental effects as a result of economic and social changes in other immediate parts of the City. Thus, the DEIR should address the potential consequences. Citizens Association for Sensible Development of Bishop Area v. County of Inyo, 172 Cal.App.3d 151; 217 Cal.Rptr. 8983 (September, 1985).

70. See response to comment #42. The OIC site consists of 144 commercial acres located immediately north of the Otay Border Crossing. Of the 144 acres, 61 acres are planned for retail commercial. The retail commercial designation applies to a total of four parcels: three adjacent parcels comprise 49 acres on the east side of future SR-125 while the other parcel on the west side of SR-125 consists of 12 acres. Although possibly large enough to support the proposed project, the surrounding area lacks the population to support the type of retail center proposed by the applicant. The existing industrial would provide some patrons; however, the area lacks the residential base and there is no assurance that residential development will occur in the near future due to poor real estate market conditions and residential building moratoriums associated with ongoing airport studies in Otay Mesa. As a result, the site was considered economically infeasible by the applicant.

The commercial uses which do exist in OIC or San Ysidro primarily consist of convenience stores and eating establishments which are oriented toward serving the needs to the employees of the businesses there. Further development of the type of retail center proposed for Palm Plaza would not be practical within this area in the near future. Such a retail center needs to have a large residential base from which to draw; no such base presently exists in these areas.

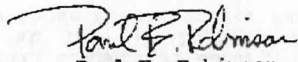
COMMENT

Ms. Ann B. Hix
July 2, 1993
Page 3

The No Project alternative or an off-site alternative, consistent with the City's General Plan and Community Plans, would avoid the significant unmitigated environmental impacts and the potential secondary effects discussed above.

We thank you for the opportunity to provide comments to the DEIR.

Sincerely,



Paul E. Robinson, A.P.C.
McDONALD, HECHT & SOLBERG

FER/bar

cc: Councilmember Juan Vargas,
City of San Diego
Mr. Jack McGrory,
City Manager, City of San Diego
Mr. Ernest Z. Freeman,
Planning Director, City of San Diego
Otay International Center

RESPONSE

COMMENT

D. BARRY SIMONS

1330 Neptune Ave.
Leucadia, CA 92024
(619) 942-3437

July 1, 1992

Ann B. Hix
Principal Planner
CITY OF SAN DIEGO
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Re: Palm Plaza Walmart
EAS No. 92-0647
DEP No. 92-0736

Dear Ms. Hix:

After reviewing the Environmental Impact Report for the above referenced project I have several concerns.

Otay Mesa Planning Group spent many hours working on the Otay Mesa Community Plan. Input was sought from the community of Otay Mesa and surrounding areas. After much consideration and expense, by the City of San Diego, the Otay Mesa Community Plan was adopted. The land use designation applied to this site by the Otay Mesa Community Plan is low-density residential. This project, being contrary to the Otay Mesa Community Plan, would cause a great loss of future residential housing. There are already several sites within the Otay Mesa Community Plan which could support the anchor tenants of the proposed project, Gateway Fair as well as the Otay Town Center and the Otay International Center, all of which do not require a Community Plan Amendment.

The Otay Mesa Planning Group reviewed this project without ever reviewing or discussing the EIR on this project. San Ysidro Planning Group is scheduled to discuss this project on July 20, 1993, thus not allowing any comments on the EIR to be in the final report.

RESPONSE

COMMENT

RESPONSE

71

The Otay Mesa Community Plan has never had the opportunity to be implemented due to the moratorium. This EIR should analyse how such a significant change to the Community Plan prior to allowing the core of the Community Plan to be implemented would effect the development of the balance of the Otay Mesa Community.

Some other concerns which I would like the Environmental Impact Report to address are:

72

1. How would this proposed project impact the Otay Mesa Community Plan and any future commercial projects along Otay Mesa Road? Otay Mesa Road is already overloaded with traffic. This proposed project would add to that traffic, noise and air pollution problem.

73

2. What would be the impact, to the project, of locating Wal-Mart and Sam's Club at this site without the additional retail adjacent to the project?

74

3. How would this project create jobs and new business in San Ysidro. The San Ysidro Enterprise Zone was created to promote jobs and the business community within San Ysidro. This project defeats the purpose of the San Ysidro Enterprise Zone by creating jobs and development near but outside the zone. Two hundred thirty businesses in San Ysidro opposed this project by placing their signatures on a petition to stop this project. San Ysidro retailers would lose customers and San Ysidro jobs would be lost, a view shared in the May 20, 1993, San Diego Daily Transcript, which has been enclosed.

75

4. How would the San Ysidro Redevelopment Project benefit this project? This project is outside the redevelopment district, thus the project would not benefit from the redevelopment district or the district benefiting from the project.

A project of this size, 700,000 sq. ft. and 80 acres, is more than the combined size of the three largest shopping centers in San Ysidro, Longs/Vons, San Diego Factory Outlet and Big Bear. Those three centers total 26 acres and somewhat over 200,000 sq. ft. By approving this project, it will shift the shopping patterns and businesses outside the Enterprise Zone and Redevelopment District.

71. See response to comments #42, #43 and #70.

72. The traffic analysis indicates that I-805 and Palm Avenue would be the primary routes travelled by patrons of the proposed project. The negligible amount of project traffic on Otay Mesa Road would not have significant noise or air quality impacts on the roadway. The traffic study concluded that Palm Avenue, east of the project, would be able to accommodate the increased traffic volumes related to Palm Plaza without exceeding the design capacity.

73. If the project were to retain the major anchor uses and eliminate the remaining retail uses, the significant environmental impacts of the project would be lessened but not avoided. The effects of such a proposal would be similar to the Partial Offsite Alternative, in that it would result in a smaller development footprint. With respect to land use and landform alteration, significant manufactured slopes would continue to be required. Similarly, this alternative would reduce but likely not avoid the RPO impacts associated with the proposed project. Traffic impacts would be reduced but remain cumulatively significant. This alternative could potentially reduce the biological impact on sensitive vegetation on the project's hillsides by moving "A" Street westward. However, it would not avoid significant biological impacts as biologically sensitive resources would still be lost. Lastly, even though the average daily trips would be lessened, cumulative air quality impacts would not be avoided.

74. See response to comments #42.

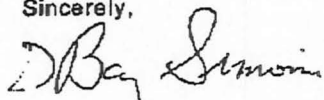
75. See response to comments #36 and #42.

COMMENT

RESPONSE

The City of San Diego's endeavor to improve the business and living conditions of its citizens, by creating Enterprise Zones, Redevelopment Districts and Community Plans, is being defeated if this Community Plan Amendment is allowed to pass as it is being submitted.

Sincerely,



D. Barry Simons

cc: Juan Vargas

COMMENT

RESPONSE

COMMENT

RESPONSE



San Diego County Archaeological Society, Inc.

Environmental Review Committee
P.O. Box A-81106 San Diego, CA 92138

June 9, 1993

To: Mr. Joe Milone
Development and Environmental Planning Division
Planning Department
City of San Diego
202 C Street, Mail Station 4C
San Diego, California 92101

Subject: Draft Environmental Impact Report
Palm Plaza Walmart
DEP No. 92-0736

Dear Mr. Milone:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based only on the information contained in the DEIR (since we were not sent a copy of the cultural resources appendix), we concur in the assessment that the project should have no significant impacts to cultural resources.

Thank you for providing SDCAS with this opportunity to participate in the City's environmental review process.

Sincerely,

James W. Royle, Jr.
James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
file

COMMENT

June 4, 1993



San Diego
ASSOCIATION OF
GOVERNMENTS

Suite 803, First Interstate Plaza
401 B Street
San Diego, California 92101
(619) 595-5300 Fax (619) 595-5305

Ms. Ann Hix
Principal Planner
City of San Diego
Development and Environmental Planning Division
Mail Station 4C

Subject: DEIR, Palm Plaza Walmart, EAS #92-0647, DEP #92-0736

Dear Ms. Hix:

SANDAG is in receipt of your Draft Environmental Impact Report (DEIR) for the above-referenced project. While SANDAG staff does not have any specific comments regarding the project itself, the DEIR traffic analysis does not include an assessment of the impact to the regional network as required in the adopted Congestion Management Program (CMP) for the San Diego Region.

76

Each local agency is required to adopt and implement the Congestion Management Program (CMP) "Enhanced CEQA Review Process for Large Projects," or its equivalent, prior to taking any discretionary land use action(s) on a CMP large project. The proposed project, which requires discretionary approval action by the City of San Diego, would generate more than 2,400 average daily vehicle trips and meets the CMP large project definition. The EIR for the project needs to meet the enhanced CEQA review process described on pages 54-57 of SANDAG's 1991 Congestion Management Program. The CMP describes the content of the enhanced CEQA review including the required traffic analysis, the project approval process, and early project coordination. The traffic analysis must consider as a minimum the project's impacts and mitigations to the regional transportation system including both state highways and the regional arterial system identified in SANDAG's 1990 Regional Transportation Plan (RTP).

If you have any questions regarding the Congestion Management Program process, please call me at 595-5369.

Sincerely,

BILL TUOMI
Manager of Transportation Programming

BT/MH/ah

MEMBER AGENCIES: Cities of Carlsbad, Chula Vista, Coronado, Del Mar, Escondido, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, San Ramon, Solana Beach, Vista and County of San Diego
ADVISORY: LTA SON MEMBERS: California Department of Transportation, U.S. Department of Defense and the LTA/Baja California

RESPONSE

76. The traffic engineer has completed the attached CMP analysis (Kimley-Horn and Associates, Inc., July 1, 1993). This analysis concludes that the project traffic would represent less than 1% of the base year traffic volume and that the LOS on I-805 with the project would be LOS C or better. The impact on portions of the two Significant Regional Arterial System Roads (Palm Avenue and Otay Mesa Road), where project traffic would constitute more than 1% of the overall base year traffic, indicates that one segment (Palm Avenue, just west of I-805) in the existing plus project condition and a second segment (Palm Avenue, just east of proposed "A" Street) would be below LOS D. However, peak hour analysis indicates that the intersections along these segments of Palm Avenue would operate at LOS D or better. As intersection operation at peak hour is a primary determinant of the performance of the roadway, the project was determined to not conflict with the CMP goal of maintaining LOS D or better on regionally important roadways.

COMMENT

RESPONSE



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2710
LOS ANGELES, CALIF. 90007-2710

REPLY TO
ATTENTION OF

MAY 28 1993

Office of the Chief
Regulatory Branch

Gatlin Development Company
c/o City of San Diego
Planning Department
Development and Environmental Planning Division
Attn: Ann B. Hix, Principal Planner
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Gentlemen:

It has come to our attention that you plan development of a 617,000-square-foot commercial center on 59.4-acres of an 87.7-acre site known as Palm Plaza Walmart, located south of Palm Avenue, east of Interstate 805, City and County of San Diego, California. This activity may impact an unnamed drainage and require a U.S. Army Corps of Engineers permit. A Corps of Engineers permit is required for:

1. Work or structures in or affecting the "navigable waters of the United States", including adjacent wetlands; construction of a pier, wharf, bulkhead or jetty, dredging, dredge disposal, filling and excavation are examples of work or structures affecting navigable waters;
2. The discharge of dredged or fill material into the "waters of the United States", including adjacent wetlands; placing bank protection, temporary or permanent stock-piling of excavated material, grading roads, any grading (including vegetative clearing operations) involving filling low areas or leveling the land, and construction of weirs, diversions, approach fills or other structures involving the placement of fill material are examples of activities involving the discharge of dredged or fill material;
3. The transportation of dredged or fill material for the purpose of dumping it into ocean waters;
4. Any combination of the above.

77. The applicant has been notified of this potential permit requirement.

77

COMMENT

Enclosed you will find a permit application form and a pamphlet that describes our regulatory program. If you have any questions, you may contact David Zoutendyk of my staff at (619) 455-9414. Please refer to this letter in your reply.

Sincerely,

Michele F. Waltz

Michele F. Waltz
Chief, South Coast Section

Enclosures

COMMENT

RESPONSE



United States Department of the Interior



FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
CARLSBAD FIELD OFFICE
2730 Loker Avenue West
Carlsbad, California 92008

July 15, 1993

Ms. Ann B. Mix, Principle Planner
City Planning Department
City of San Diego
202 C Street, Mail Station 4c
San Diego, California 92101

Re: Draft Environmental Impact Report for Palm Plaza Walmart, San Diego,
California DEP No. 92-0736 *EAS 92-0647*

Dear Ms. Hix:

The Fish and Wildlife Service (Service) has reviewed the Draft Environmental Impact Report (EIR) for Palm Plaza Walmart, San Diego, California. As requested, the Service is providing the City of San Diego with technical assistance. The following comments and recommendations on the biological impact of the project are based on our knowledge of sensitive and declining habitat types and species in San Diego County.

The proposed Palm Plaza project would develop a commercial center on 59.4 acres of an 87.7-acre site in the Otay Mesa Community planning area, at the southeast corner of Interstate 805 and Palm Avenue. Impacts addressed in the EIR also include 3.3 acres of vegetated area which would be impacted by the proposed offsite extension of "A" Street and Del Sol Boulevard to the south of the project site. Approximately 25 acres of the subject site is planned for natural open space or revegetated manufactured slopes. The project, as designed, will impact 1.5 acres of maritime succulent scrub, 3.9 acres of Diegan coastal sage scrub, .6 acres of mulefat scrub, and 35.3 acres of nonnative grassland. Species likely to be impacted by the proposed project include: California gnatcatcher (*Polioptila californica californica*), coastal cactus wren (*Campylorhynchus brunneicapillus couesi*), turkey vulture (*Cathartes aura*), black-shouldered kite (*Niapus caeruleus*), Cooper's hawk (*Accipiter cooperi*), prairie falcon (*Falco mexicanus*), greater roadrunner (*Geococcyx californicus*), loggerhead shrike (*Lanius ludovicianus*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), coast barrel cactus (*Ferocactus viridescens*), San Diego bur sage (*Ambrosia chenopodiifolia*), cliff spurge (*Euphorbia misera*), San Diego sunflower (*Viguiera laciniata*), California adolphia (*Adolphia californica*), and snake cholla (*Opuntia parryi* var. *serpentina*).

The Service has the legal responsibility for the welfare of all migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service has responsibilities under the Clean Water Act and the Endangered Species Act of 1973, as amended (Act). Our mandates require

COMMENT

RESPONSE

Ms. Nix

that we provide comments on any public notice issued for a Federal permit or license affecting the Nation's waters, in particular, Army Corps of Engineers (Corps) permits pursuant to section 404 of the Clean Water Act and section 10 of the River and Harbor Act of 1899. The Service is responsible for the administration and enforcement of the Endangered Species Act, including listing and recovery of endangered species, 10(a) permit issuance and consultation with Federal agencies for actions which may affect federally listed endangered species. Section 9 of the Act additionally prohibits the "take" (e.g. harm, harassment, pursue, injure, kill) of federally listed fish and wildlife species. "Harm" is further defined as an act which may result in significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavior patterns including breeding, feeding or sheltering (50 CFR 17.3). "Take" can only be permitted pursuant to the pertinent language and provisions in section 7 and section 10(a). The take provisions apply upon the effective date of listing in the Final Rule published in the Federal Register.

The proposed project is likely to result in take of the California gnatcatcher, a federally listed threatened species, thus an incidental take permit under section 10(a) is necessary. Although the EIR states that six gnatcatchers were seen on the subject site, the level of take likely to result from the proposed project is unclear. The project applicant has already approached the Service to determine the appropriate procedure to obtain an incidental take permit, and the Service strongly encourages the project applicant to coordinate with the City of San Diego to participate in the Multiple Species Conservation Program (MSCP), a large scale planning effort which provides an avenue for obtaining a permit. Regardless of the approach taken by the applicant, the goal of mitigation for impacts to gnatcatchers should be to prevent loss of gnatcatcher habitat value.

The EIR proposes to mitigate the loss of 5.4 acres of California gnatcatcher habitat through off-site purchase of 10.8 acres of Diegan coastal sage scrub in Lakeside, California. The Service believes it is inappropriate, in this case, to mitigate for the loss of gnatcatcher habitat by preserving land which is not in proximity to the project site. The subject property occurs within a core population area for the California gnatcatcher, and gnatcatcher habitat value within this core area should be preserved, either by avoiding impacts or by restoring, enhancing, and preserving habitat in the vicinity.

The Service has been petitioned to list the cactus wren as endangered, and we are concerned over project impacts to this species. The take provisions of section 7 and section 10(a) of the Act would apply upon the effective listing date of the species, regardless of the stage in the issuance of City, County or state development permits. It is thus recommended that the project applicant avoid impacts to cactus wren habitat, or enter into a pre-listing agreement with the Service over appropriate measures to mitigate such impacts.

The offsite preservation of coastal sage scrub is proposed in the EIR as mitigation for loss of 1.5 acres of maritime succulent scrub. There are less than 2,000 acres of maritime succulent sage scrub habitat remaining within City of San Diego boundaries. The Service strongly recommends that remaining maritime succulent sage scrub be preserved and that a no net loss policy for

78. See responses to comments #11 and #12. As stated on page IV.55 of the EIR, the expected "take" for the Coastal California Gnatcatcher is 5.3 acres of habitat currently utilized by the six birds observed on the site.

79. The correct estimate of the amount of gnatcatcher habitat to be impacted by the project is 5.3 acres.

See response to comment #11. The applicant is now proposing to mitigate for Diegan coastal sage scrub in the immediate vicinity of the project. The identified property is considered good gnatcatcher habitat and a gnatcatcher has been observed on one of the parcels.

80. The biology report identifies the importance of the cactus wren and its status as a candidate for Federal listing. However, no cactus wren were observed in the project site during the biology survey. Therefore, the project is not expected to impact cactus wrens.

81. See response to comment #11. The applicant has modified the mitigation monitoring and reporting program to include mitigation for the loss of maritime succulent scrub in the vicinity of the project at a ratio of 2:1.

COMMENT

RESPONSE

Ms. Hix

81
cont.

this habitat be incorporated into the subject project and all future projects. If any maritime succulent scrub is to be lost, this loss should be compensated through in-kind mitigation rather than coastal sage scrub preservation.

82

No mention of fairy shrimp was made in the EIR's discussions on the isolated ephemeral wetland. The Service is aware that both the Riverside fairy shrimp (*Streptocephalus wootoni*), a species proposed as federally endangered, and the San Diego fairy shrimp (*Brachinecta sandiegense*), for which the Service has been petitioned to list as endangered, have been found in vernal pools on Otay mesa. We recommend that samples be taken from the ephemeral wetland on the subject property to determine the presence of fairy shrimp. As is discussed above in regard to the California gnatcatcher and cactus wren, should either fairy shrimp species become federally listed in the future, the take provisions of the Act would apply to these species upon the effective date of listing.

Within Southern California, intense development pressures have resulted in threats to many of the diverse habitat types present. Numerous plant and animal species in San Diego County are candidates for Federal listing. Candidate species represent those species for which the Service has substantial information to support listing as threatened or endangered (Category 1), or taxa which may warrant listing, but for which substantial information to support a proposed rule is lacking (Category 2). These high numbers of candidate species in the region reflect the rapid downward trend in regional biodiversity and emphasize the urgency of protecting the habitat that remains.

The primary goal of identifying Federal candidate species is to notify agencies of the documented decline of certain species and to alert these agencies to the possible designation of these species as threatened or endangered. The candidate species list provides an "early alert" which can allow for the consideration of these species in planning and protection efforts. Allowing species to decline to levels that warrant Federal listing as endangered may complicate or interrupt planned projects. We urge the City of San Diego to give great weight to the protection of candidate plant and animal species.

83

In addition to the California gnatcatcher and cactus wren, three federal category 2 animal species and one category 1 plant were found during surveys of the subject property: Southern California rufous-crowned sparrow, Loggerhead shrike, Cooper's hawk, and coast barrel cactus. None of these species were discussed in the biological impacts section of the EIR, even though it is certain that the project would impact habitat for these species. The impact and mitigation analyses for this project should address habitat loss for these species.

84

The Gateway Fair alternative, presented in chapter 9 of the EIR, would avoid impacts to the California gnatcatcher, coastal cactus wren, and their habitat. The Service thus recommends this environmentally preferred alternative over the proposed one.

In summary, the Service believes that adequate measures have not been

82. The Biological Survey Report for the subject property (Appendix C of the EIR) does discuss the San Diego Fairy shrimp (page 29) as having a moderate potential to occur in the small seasonal isolated wetland found on the site but sampling would be required to confirm its presence or absence. Subsequent to public circulation of the Draft EIR, the Riverside fairy shrimp was listed by the U.S. Fish & Wildlife Service as an endangered species. To ensure that no impact would occur to this potentially-occurring species, the following mitigation measure has been added to the EIR:

Mitigation Measure IV.D.3: Prior to issuance of a grading permit or recordation of a final map, soil hydration tests shall be completed to determine whether the endangered Fairy Shrimp inhabits the seasonal wetland located on the property. A letter report from a qualified biologist detailing the methodology used and the results shall be submitted to the principal planners office. If the species does occur, evidence shall be provided before commencement of grading that a Section 7 or 10(a) permit has been received from with the U.S. Fish and Wildlife Service.

83. The presence of California rufous-crowned sparrow and Loggerhead shrike is identified in the existing conditions section of the EIR on page IV-54; coast barrel cactus is identified on page IV-52. The EIR indicates that these species would be lost on page IV-56. More detailed discussion of the loss of these species in the EIR is not warranted based on the fact that the losses would not be significant.

84. Comment acknowledged.

COMMENT

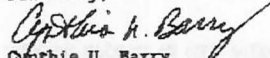
RESPONSE

Ms. Nix

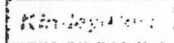
presented to mitigate impacts to biological resources on the subject property. We recommend that avoidance, minimization or compensation measures be utilized to reduce all biological impacts to a level below significance.

The Service remains willing to work with the City of San Diego and the project applicant to ensure that project impacts are adequately mitigated. If you have any questions, please contact Ellen Berryman of this office at (619) 431-9440.

Sincerely,


Cynthia U. Barry
Acting Field Supervisor

COMMENT



Kimley-Horn and Associates, Inc.
ENGINEERING, PLANNING AND INFORMATION CONSULTANTS

2100 West Orangewood Avenue, Suite 140, Orange, California 92668 714-839-1100 Fax 714-956-8488

July 1, 1993

RESPONSE

Ms. Ann Hix
Principal Planner
City of San Diego
Development and Environmental
Planning Division
Mail Station 4C
San Diego, California 92101

Re: DIER, Palm Plaza Wal-Mart, EAS #92-0647, DEP #92-0736

Dear Ms. Hix:

This letter is in response to the letter dated June 4, 1993 by Bill Tuomi of SANDAG. In his letter to you, Mr. Tuomi has requested an assessment of the impact of the proposed project on the regional network to comply with the adopted Congestion Management Program (CMP). The required analysis is presented in this response to the comment.

CONGESTION MANAGEMENT PROGRAM COMPLIANCE

The San Diego County Congestion Management Program (CMP) was developed in response to California Proposition 111, approved June 1990, and is intended to directly link land use, transportation and air quality to conform to the CMP.

Among the elements of the CMP is a land use analysis program which establishes an "enhanced CEQA (California Environmental Quality Act) review process" to be fully implemented by October, 1992. This enhanced CEQA process applies to all discretionary projects which would be expected to generate 2,400 or more daily trips or 200 or more peak hour trips upon completion, and requires a more detailed analysis of regional impacts to state highways and significant regional arterials.

The 1991 CMP identifies a 687 mile CMP System, which includes those highways that provide the highest level of regional traffic service, serve major regional facilities, and provide significant inter-community traffic service and freeway congestion relief. Within the study area, Interstate 805 and SR-905 are included in the CMP System. Otay Mesa Road from SR-905 to SR-125 is included only as an interim route until the SR-905 is extended to SR-125. The 1991 CMP also identifies a Significant Regional Arterial System, based on the 1990 Regional Transportation Plan, which includes 93 regional arterial system routes the purpose of which is to provide accessibility between communities within the region. Within the study area, Palm Avenue and Otay Mesa Road are included in the Significant Regional Arterial System.

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COMMENT

RESPONSE

Ms. Ann Hix

-2-

July 1, 1993

CMP and Significant Regional Arterial System LOS Standards

The 1991 CMP establishes traffic level of service standards for CMP System facilities, and traffic level of service objectives for CMP System and Significant Regional Arterial System facilities. The CMP System level of service standard is LOS E, or LOS F if that is the actual 1990 base year level of service. Further, a level of service objective of LOS D for all Significant Regional Arterial System facilities has been established to assure the success of the Regional Growth Management Strategy. The intent is that all future planning and project mitigation programs will attempt to achieve LOS D, with the provision that the objective may be adjusted on specific roadways or intersections where appropriate mitigation measures have been applied to minimize effects and/or overriding social or economic benefits can be identified.

CMP LOS Analysis

The 1991 CMP identified the 1990 base year LOS on roadways in the vicinity of the proposed Wal-Mart Center. The following table lists those facilities where Wal-Mart Center traffic is expected to comprise greater than 1% of total traffic and the LOS for each respectively.

Facility	Limits	Base Year ADT	Base Year LOS	Estimated Project Generated ADT	Estimated LOS with Project
I-805	North of Palm Ave.	70,300-96,000	B	12,700	B-C
I-805	Palm Ave. to SR-905	70,300-96,000	B	6,000	B
I-805	South of SR-905	37,200-37,700	A	3,000	A
SR-905	West of I-805	28,900-35,000	B	1,000	B
SR-905	I-805 to Otay Mesa Rd.	28,900-35,000	B	2,000	B

When project traffic is added to the existing roadway system, each of the above facilities is projected to experience a LOS of C or better, far better than the CMP LOS E standard.

Based upon the Route Concept Report for I-805 (Caltrans, 1991), and volumes provided by SANDAG through the South Bay Series Seven Traffic Model (previously presented in the Wal-Mart South Palm Traffic Study, May 1993), the I-805 freeway is projected to operate at a poor LOS F condition in the future (2010 and Build-out). Wal-Mart Center traffic is expected to comprise 5% of the daily traffic on I-805 just north of Palm Avenue, and approximately 1% or less on all other CMP roadway segments.

COMMENT

RESPONSE

Ms. Ann Hix

-3-

July 1, 1993

Significant Regional Arterial System LOS Analysis

As previously mentioned, the 1991 CMP set a standard of LOS D for the Significant Regional Arterial System. The roadways on this system in the vicinity of the Wal-Mart Center are Palm Avenue and Otay Mesa Road. The projected LOS was analyzed for each of the segments on these two facilities where Wal-Mart Center traffic is expected to comprise more than 1% of the future traffic. These include Palm Avenue from the SR-905 to the I-5. The analysis is summarized in Table 1.

The analysis indicates that all of the roadway segments analyzed on the Significant Regional Arterial System currently operate at LOS D or better and are projected to do so under buildout conditions. With the addition of Wal-Mart Center traffic, one segment is projected to carry ADT above its LOS D capacity for existing plus project condition, as well as one segment for buildout plus project conditions.

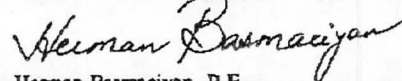
Palm Avenue just west of I-805 is projected to carry 38,100 vehicles per day for existing plus Wal-Mart Center conditions which is 3,100 vehicles above the LOS D capacity. However, peak hour intersection analysis in the traffic study has indicated that intersections will be operating at LOS D. Accordingly, the segment would not be expected to be worse than LOS D despite the comparison of daily traffic to daily capacity.

Palm Avenue just east of "A" Street is projected to carry 36,200 vehicles per day for buildout plus project conditions which is 1,200 vehicles above the LOS D capacity. Peak hour intersection analysis has indicated that the operation will be at LOS D for this location as well.

Please contact me if I can answer any questions or provide further details about this matter.

Very truly yours,

KIMLEY-HORN AND ASSOCIATES, INC.



Herman Basmaciyaz, P.E.
Vice President

HB:jgr
9824.02/cmp.mem

COMMENT

RESPONSE

Ms. Ann Hix

-4-

July 1, 1993

TABLE 1

SUMMARY OF EXISTING AND BUILDOUT ANALYSIS SIGNIFICANT REGIONAL ARTERIAL SYSTEM

EXISTING

Existing Roadway Segment	Existing Classification	LOS D Capacity	Existing ADT	Existing LOS is D or Better	Project ADT	Existing Plus Project ADT	Existing plus Project LOS is D or Better	Project Traffic % of Total Traffic
Palm Avenue								
I-5 to Hollister	6M	45,000	23,000	Yes	4,000	31,000	Yes	10%
Hollister to Boyer Blvd.	4M	35,000	14,500	Yes	7,500	24,000	Yes	51%
Boyer Blvd. to Ponder Blvd.	4M	35,000	21,200	Yes	9,000	30,200	Yes	80%
E. of Ponder Blvd.	4M	35,000	23,900	Yes	11,000	34,900	Yes	82%
W. of I-805	4M	35,000	24,000	Yes	12,300	36,300	No	32%
I-805 to "A" St.	7P	60,000	2,200	Yes	30,200	32,400	Yes	85%

BUILDOUT

Buildout Roadway Segment	Buildout Classification	LOS D Capacity	Buildout ADT	Buildout LOS is D or Better	Project ADT	Buildout Plus Project ADT	Buildout plus Project LOS is D or Better	Project Traffic % of Buildout Traffic
Palm Avenue								
I-5 to Hollister	6M	45,000	31,400	Yes	1,000	21,400	Yes	5%
Hollister to Boyer Blvd.	4M	35,000	29,200	Yes	1,000	30,200	Yes	3%
Boyer Blvd. to Ponder Blvd.	4M	35,000	25,900	Yes	2,000	27,900	Yes	7%
E. of Ponder Blvd.	4M	35,000	24,100	Yes	2,400	26,500	Yes	8%
W. of I-805	4M	35,000	31,000	Yes	3,000	34,000	Yes	9%
I-805 to "A" St.	7P	60,000	42,400	Yes	13,800	56,200	Yes	23%
E. of "A" St.	4M	35,000	31,700	Yes	4,500	36,200	No	12%
W. of Democracy Cyn. Ranch Rd.	4M	35,000	19,000	Yes	1,700	14,700	Yes	12%
Democracy Cyn. Ranch Rd. to Del Sol	4M	35,000	8,900	Yes	1,400	11,500	Yes	12%
Del Sol to Ony Moss Rd.	4M	35,000	26,100	Yes	2,100	28,200	Yes	10%
Ony Moss Rd to SR 905	4M	35,000	26,100	Yes	2,000	28,100	Yes	7%

**DRAFT
ENVIRONMENTAL IMPACT REPORT**

for

Palm Plaza

**DEP No. 92-0647
SCH No. 92111021**

May 18, 1993

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY	S-1
I. INTRODUCTION	I-1
A. Purpose and Scope of the EIR	I-1
B. CEQA Requirements	I-1
II. ENVIRONMENTAL SETTING	II-1
A. Location	II-1
B. Physical Characteristics	II-1
C. Surrounding Land Uses	II-4
D. Applicable Plans and Policies	II-4
III. PROJECT DESCRIPTION	III-1
A. Project Objectives	III-1
B. Project Background	III-1
C. Project Characteristics	III-1
D. Proposed Discretionary Actions	III-13
IV. ENVIRONMENTAL ANALYSIS	IV-1
A. Land Use	IV-1
B. Landform Alterations/Visual Quality	IV-17
C. Traffic	IV-29
D. Biological Resources	IV-47
E. Air Quality	IV-60
F. Noise	IV-69
G. Geology/Soils	IV-74
H. Utilities	IV-81
I. Paleontology	IV-86
J. Cultural Resources	IV-89
K. Human Health/Public Safety	IV-92
L. Hydrology/Water Quality	IV-95
V. GROWTH INDUCEMENT	V-1
VI. CUMULATIVE IMPACTS	VI-1

TABLE OF CONTENTS (Cont.)

<u>Section</u>	<u>Page</u>
VII. SUMMARY OF ENVIRONMENTAL CONSEQUENCE	VII-1
A. The Relationship Between Local Short-term Uses of the Environment and the Maintenance and Enhancement of Long-term Productivity	VII-1
B. Any Significant Irreversible Environmental Changes Which Would be Involved in the Proposed Action Should it be Implemented	VII-2
VIII. EFFECTS FOUND NOT TO BE SIGNIFICANT	VIII-1
IX. ALTERNATIVES TO THE PROPOSED ACTION	IX-1
A. No Project	IX-1
B. Development Under Existing Land Use Designation	IX-2
C. Modified "A" Street Alternative	IX-4
D. Offsite Alternative	IX-6
X. REFERENCES	X-1
XI. INDIVIDUALS AND ORGANIZATIONS CONSULTED	XI-1
XII. CERTIFICATION PAGE	XII-1
APPENDICES (under separate cover)	
A. Notice of Preparation and Responses	
B. Traffic Report	
C. Biology Report	
D. Air Quality Report	
E. Noise Study	
F. Geology Reports	
G. Paleontological Report	
H. Archaeology Report	
I. Burn Dump Material Reports	
J. Drainage Study	

List of Tables

<u>Table</u>		<u>Page</u>
S-1	Significant Effects	S-5
S-2	Effects Found Not To Be Significant	S-12
III-1	Proposed Site Plan Statistics	III-2
III-2	Discretionary Actions	III-13
IV-1	Steep Slopes	IV-14
IV-2	Biological Sensitive Lands	IV-16
IV-3	Project Trip Generation	IV-34
IV-4	Summary of Roadway Segment Capacity Analysis	IV-34
IV-5	Summary of Intersection Level of Service	IV-37
IV-6	Summary of Vegetation Impacts	IV-56
IV-7	Ambient Air Quality Standards	IV-61
IV-8	San Diego Area Air Quality Monitoring Summary	IV-63
IV-9	Palm Avenue V/C Ratio	IV-67
IV-10	Noise Impact Summary	IV-70
IV-11	Summary of Project Surface Runoff	IV-97
IV-12	Project Impacts on Existing Drainage Facilities	IV-98

List of Figures

<u>Figure</u>		<u>Page</u>
II-1	Regional Vicinity Map	II-2
II-2	Project Site Location	II-3
II-3	Aerial Photograph	II-5
III-1	Site Plan	III-3
III-2	Building Elevations	III-6
III-3	Grading Plan	III-7
III-4A	Landscape Plan Legend	III-10
III-4B	Landscape Plan	III-11
III-5	Tentative Map	III-14
IV-1	Otay Mesa Community Plan	IV-2
IV-2	Surrounding Projects	IV-3
IV-3	Resource Protection Ordinance Analysis	IV-7
IV-4	Brown Field Airport Influence Area	IV-9
IV-5	Proposed Community Plan Amendment	IV-11
IV-6	View from I-805 (Palm Avenue Interchange) Looking Southeast Across Property	IV-19
IV-7	View from Palm Ridge Park	IV-21
IV-8	Cross Sections	IV-25
IV-9	Existing Study Area Roadways and Traffic Volumes	IV-30
IV-10	Project Trip Distribution Under Existing Conditions	IV-33

IV-11	Recommended Lane Configurations at the I-805/Palm Avenue Interchange	IV-36
IV-12	Project Trip Distribution Under Build-out Conditions	IV-38
IV-13	Proposed Project Driveways	IV-41
IV-14	Traffic Mitigation	IV-45
IV-15	Biological Map Onsite	IV-49
IV-16	Biological Map Offsite	IV-51
IV-17	Offsite Compensation Area	IV-59a
IV-18	Palm Plaza Noise Contours	IV-71
IV-19	Geology Map	IV-75
IV-20	Project Area Drainage Sub-basins	IV-96
IV-21	Proposed Drainage Plan	IV-99
IX-1	Location of Offsite Alternative	IX-7

SUMMARY

Introduction

The following is a brief summary of the environmental impact report (EIR) for the proposed Palm Plaza project. This summary of the proposed project is provided as a convenience to the reader to allow for an overall understanding of the proposed commercial development and the environmental impacts associated with its implementation. The reader is referred to the full EIR and associated appendices for more detailed discussions.

Project Description

The proposed Palm Plaza project would develop approximately 617,000 square feet of commercial retail uses on a 60-acre site located at the southeast corner of the I-805/Palm Avenue. The project site is located in the northwesterly portion of the Otay Mesa community planning area.

The site is currently vacant but has been disturbed in the past by several activities including a borrow operation to obtain fill for an offsite development and an abandoned landfill. Ongoing offroad vehicle activity continues to degrade the site.

The proposed Palm Plaza would be anchored by a Wal-Mart discount store and a Sam's membership warehouse store. With a combined square footage of 319,709 square feet, these two stores would represent over 50% of the project. The balance of the retail center would be composed of smaller retail shops and services located within adjacent retail buildings as well as freestanding pads.

Access to the site would be from Palm Avenue and the proposed "A" Street. Regional access would be provided by Interstate 805.

Implementation of the project would require a number of discretionary actions. The land use designation applied to the site by the Otay Mesa Community Plan must be amended from Residential (very low density, 0-5 d.u./acre) to Commercial to allow the proposed retail uses; the zoning must also be changed from A-1-10 to CA. A planned commercial development permit must be issued for the proposed center and a conditional use permit would be required for the proposed automobile service station. A tentative map must be approved to create the proposed lots. A grading permit must also be approved.

Environmental Analysis

Table S-1 summarizes the significant environmental impacts that would result from implementation of the proposed project as well as proposed mitigation measures. The last column concludes whether the mitigation is sufficient to reduce the impact to below a level of significance. Table S-2 describes Environmental Effects Found Not to Be Significant.

Project Alternatives

In developing the alternatives to be addressed in this report, potential alternatives were evaluated in terms of their ability to meet the basic goals and objectives of the project and to eliminate or further reduce significant direct and cumulative environmental effects associated with the project.

Based on these two primary goals, four alternatives were considered: (1) no project, (2) development under the existing land use designation, (3) modified "A" Street alignment, and (4) offsite alternatives. These alternatives are discussed briefly below:

No Project

This alternative would maintain the property in its present vacant condition. This alternative would eliminate the additional traffic and associated air quality impacts associated with the proposed project. The biology and landform impacts would also be avoided.

The applicant has rejected the No Project alternative because it would not achieve the basic objective of the project which is to develop a commercial retail center.

Existing Land Use Designation

This alternative would involve development of the site with single-family residences at a density of 0-5 dwelling units per acre as currently allowed under the Otay Mesa Community Plan. It is estimated that the project could support up to 252 single-family dwelling units. It is assumed that the development footprint is dictated by site topography and would occupy the same area as the proposed project.

The residential development alternative would avoid the traffic and air quality impacts of the proposed project. In addition, this alternative would likely reduce the land use, landform and biology impacts by allowing the alignment of "A" Street to be moved partially out of the sensitive slope and allowing for preservation of the wetland areas.

The applicant has rejected this alternative because it would not meet the basic objective of the project which is to develop a commercial center.

Modified "A" Street Alignment

The goal of this alternative would be to move the alignment of "A" Street as far west as possible in order to reduce its impact on the landform and associated native vegetation along the eastern boundary of the site.

This alternative may reduce but not eliminate the significant, unmitigated land use, landform and biology impacts related to the proposed project. However, the impacts on traffic and air quality would remain the same.

The applicant has rejected this alternative because it significantly impacts the opportunity to locate a large commercial building at the southern end of the property.

Offsite Alternatives

A property to the north, known as the Gateway Fair project, was selected as an offsite alternative. Although this site meets the locational criteria, it falls short of the acreage needed to accommodate the full project. As a result, a partial offsite alternative was also considered which would place a portion of the proposed development on the subject property and a portion on the Gateway Fair site.

The full offsite alternative would utilize the 31-acre site Gateway Fair site which is located immediately north of the proposed site across Palm Avenue. A Planned Commercial Development (PCD) permit has been previously approved for this site and the northern portion of the site (approximately 50%) has been mass-graded; however, no development has taken place as yet. A preliminary review of the 25 net-acre site by the applicant, indicates that the site could support the Wal-Mart store and approximately 90,000 square feet of additional retail commercial uses; however, the site would not be large enough to accommodate the proposed Sam's Club.

Although the site falls short of meeting the goal of co-locating a Wal-Mart and Sam's Club, the Gateway Fair site would be the environmentally preferred alternative because it would utilize a site which has been approved for commercial development as well as mass graded. Thus, it would avoid the significant, unmitigated impacts of development of the proposed site related to land use, landform, biology, traffic (direct) and air quality. It would reduce but not avoid the cumulative traffic impact.

The applicant has rejected the Gateway Fair site because it cannot support the Sam's Club. As stated earlier, the co-location of a Wal-Mart and Sam's Club is a fundamental objective of the project.

The partial offsite alternative would utilize the Gateway Fair site as well as the disturbed portion of the Palm Plaza site. This alternative would allow the applicant to meet the

desired amount of commercial square footage while reducing the land use, landform and biological impacts; the traffic and air quality impacts would be unchanged.

Under this alternative, the Wal-Mart and approximately 25% of the proposed commercial retail uses (80,000 square feet) would be constructed on the Gateway Fair site. The Sam's Club and the remaining 217,300 square feet of commercial retail development would be constructed on the Palm Plaza site. Splitting the development between the two sites would allow greater flexibility in the location of "A" Street because less developable area must be provided on the Palm Plaza site. Thus, the partial offsite alternative would combine the elements of the full offsite and the modified "A" Street alternatives.

The partial offsite alternative would substantially reduce but not eliminate the significant land use and landform alteration impacts associated with the proposed project. It would also lessen but not avoid significant biological impacts. Traffic and air quality impacts would be the same as the proposed project.

The applicant has rejected this alternative because it would not enable the maximum use of the project site and would require acquisition of the Gateway Fair site.

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Land Use		
<p>Implementation of the project would have a significant impact on land use relative to the environmental goals of the Otay Mesa Community Plan and the Resource Protection Ordinance. Grading including slopes up to 81 feet would conflict with the community plan goal of minimizing landform alteration. The project would exceed the encroachment allowed by RPO in both steep slopes and biologically sensitive lands.</p>	<p>No project mitigation measures exist to fully mitigate the land use impacts. Revegetation of manufactured slopes is proposed to reduce the visual impact but would not overcome the landform impact. While onsite and offsite biological compensation is proposed to mitigate the loss of sensitive vegetation, RPO does not allow any encroachment into wetlands. Thus, the project is technically unable to fully mitigate RPO impacts on biologically sensitive lands. The land use impact would only be avoided by the no project or offsite alternatives.</p>	No
Landform Alteration		
<p>The proposed project would have a significant impact on the landform features found on the project. In order to create the necessary pad area and construct "A" Street to City design standards, an ravine would be filled and the steep slopes along the eastern boundary cut. Forty-four feet of fill would be placed in the ravine and the cut slopes along "A" Street would reach a maximum height of 85 feet and extend a distance of approximately 4,000 feet when both the onsite and offsite portions are considered.</p>	<p>No mitigation measures are available to avoid the significant landform impact. The curve radius standards for "A" Street preclude efforts to substantially reduce cutting along the eastern slopes. The modified "A" Street alternative reduces the landform impact but not to a level below significance. The impact would only be avoidable through the no project or offsite alternatives.</p>	No

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Biology (Direct)		
<p>Development of the project would have significant direct impacts to sensitive vegetation and wildlife found on the property. Two sensitive vegetation types would be directly impacted by onsite development and offsite construction of "A" Street: Diegan coastal sage scrub (3.9 acres) and maritime succulent scrub (1.5 acres). Several sensitive bird species would be impacted by the loss of these two vegetation types but the most notable is the federally-listed coastal California gnatcatcher. Six gnatcatchers were observed during biological surveys. An estimated 5.3 acres of vegetation being utilized by this bird would be lost with development of the site.</p>	<p>Full mitigation of the direct biological impacts would be achieved by preservation of 10.8 acres of Diegan coastal sage scrub 7.8 acres of Diegan coastal sage scrub and 3.0 acres of maritime succulent scrub. A nearby offsite mitigation area has been identified, in the community of Lakeside. The area possesses high quality Diegan coastal sage scrub; portions of which support coastal California gnatcatchers. Although this area contains no maritime succulent scrub, the high value of the Diegan coastal sage scrub and the presence of gnatcatchers is considered to represent adequate compensation for maritime succulent scrub as well as Diegan coastal sage scrub. The mitigation area must be placed in a recorded open space easement or otherwise assured prior to recordation of a final map or issuance of a grading permit.</p> <p>Soil hydration tests will be conducted to determine if the Riverside fairy shrimp is present. If found, evidence shall be provided that a Section 7 to 10(a) agreement has been reached with USFWS.</p>	Yes
<p>If present in the seasonal wetland, the project would have a significant impact on Riverside fairy shrimp.</p>		
Biology (Cumulative)		
<p>The project would have a cumulatively significant impact associated with the loss of wetlands and raptor foraging area associated with non-native grasslands. Wetlands are a relatively uncommon habitat in the region which have been substantially diminished by past development. Therefore, any loss of wetland has a cumulatively significant impact. Similarly, raptor foraging areas are disappearing as development occurs and any loss is considered cumulatively significant.</p>	<p>No mitigation measures are proposed to reduce the cumulative biological impacts to below a level of significance. However, the applicant is proposing to contribute \$10,000 to the City of San Diego's Mitigation Bank Program to help compensate for cumulative impacts. The impact would be avoided by the no project or offsite alternative.</p>	No

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Traffic Circulation (Direct)		
<p>Under existing plus project conditions, the intersection analysis revealed that the intersections of Palm Avenue at the southbound and northbound I-805 ramp terminals would be significantly impacted, since they would be operating with LOS D during PM peak hours.</p>	<p>Existing plus project impacts on the southbound and northbound I-805/Palm Avenue ramp terminals would be reduced by assuring the lane configurations shown on Figure IV-14 and the installation of traffic signal. Although the impact on the northbound ramp terminal would be mitigated below a level of significance, the impact on the southbound ramp terminal would remain significant.</p>	No
<p>With respect to site access, signal warrant analysis determined that, without signalization, the project would have potentially significant impacts at two driveways.</p>	<p>Potentially significant site access impacts would be reduced to below a level of significance by assuring the installation of traffic signals at the intersections of "A" Street/Driveway "D" and "A" Street/Driveway "E" and assuring lane configurations shown on Figure IV-14.</p>	
<p>Project implementation would be accompanied by a number of improvements intended to promote vehicular and non-vehicular access to the site.</p>	<p>Conformance to City of San Diego standards for vehicular and non-vehicular street improvements would avoid significant traffic hazards to motor vehicles, bicyclists, or pedestrians. Mitigation Measures IV.C.1 through IV.C.4 and pedestrian circulation provisions contained on the proposed site plan would provide adequate mitigation.</p>	
<p>Project implementation would not result in significant impacts associated with the City's TDM Ordinance.</p>		

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Traffic Circulation (Cumulative)		
<p>There would be a significant cumulative impact under the interim conditions with project scenario, which would consist of project traffic and traffic associated with 1513 dwelling units and 5.5 acres of commercial development in the area to the east of Palm Avenue. The southbound I-805 ramp terminal under this scenario would operate at an unacceptable LOS D during the afternoon peak hour.</p>	<p>No project mitigation measures are available to reduce the cumulative impact on the southbound I-805/Palm Avenue ramp terminals under the interim conditions with project scenario to below a level of significance.</p>	No
<p>Under the build-out with project conditions, there would be significant cumulative traffic impacts on the Palm Avenue/"A" Street intersection, the I-805/Palm Avenue ramp terminals, and the intersection of Del Sol Boulevard and "A" Street. The Palm Avenue "A" Street intersection would operate at an unacceptable LOS D in the AM peak hour and LOS E during the PM peak hour. With ultimate lane assumptions at the I-805/Palm Avenue interchange, the ramp terminals would operate at LOS D in the AM and PM peak hours. The intersection of Del Sol Boulevard and "A" Street would operate at an unacceptable LOS D during the PM peak hour.</p>	<p>Build-out with project impacts on southbound and northbound ramp terminals would remain unmitigated (LOS D) even after ultimate improvements are made to the interchange. These ultimate improvements, which include widening of the Palm Avenue overpass, are not included as project mitigation. No measures have been identified which would fully mitigate the project's cumulative impact on the I-805/Palm Avenue interchange to below a level of significance.</p>	
	<p>Build-out with project impacts on the Palm Avenue/"A" Street intersection would be reduced but remain significant by assuring traffic signalization and the lane configurations shown in Figure IV-14. Level of service during the AM peak hour would remain at LOS D and improve from LOS E to LOS D during the PM peak hour. No project mitigation is available to avoid the unacceptable LOS D (AM and PM peak hours) after implementation of the foregoing measures.</p>	

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Traffic (cont.)	With the assurance of a traffic signal and lane configurations shown in Figure IV-14, build-out with project impacts on the intersection of Del Sol Boulevard/"A" Street would operate at LOS B during the morning peak hour. However, during the PM peak hour, the unacceptable LOS D operating condition would remain unmitigated.	
Air Quality (Direct)		
Construction activities associated with the proposed project could create significant short-term air quality impacts by increasing the amount of particulate matter emitted into the San Diego air basin. The project could generate approximately 660 pounds per day of Particulate Matter (PM-10); any project which contributes more than 250 pounds per day is considered a major source of PM-10.	The developer would comply with all San Diego County APCD measures regarding control of nuisance from the generation of dust and fumes during construction. Dust control measures would include: (1) twice-daily watering of disturbance areas and (2) chemical stabilization of off-road haul routes.	Yes
Air Quality (Cumulative)		
Mobile-source emissions associated with implementation of the project would be cumulatively significant. Project-impacted intersections which would experience unacceptable levels of service would compound regional air quality problems. The incremental contribution to the non-attainment status of the San Diego Air Basin would be cumulatively significant in conjunction with all other planned regional growth.	Implementation of the Transportation Demand Management Plan which would be required of the project would reduce the cumulative air quality impacts. However, full mitigation for the cumulative air quality impact is beyond the control of one project.	No

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
<p>Noise</p> <p>The additional traffic related to the commercial use on "A" Street would increase traffic noise above that which would occur with residential development. Although traffic volumes would exceed 65 dB(A) without the commercial use, the increase in project traffic would extend the 65 dB(A) contour an additional 65 feet along the "A" Street through the property and 45 feet further from the road to the south. This would affect future residential developments expected to occur to the east and south.</p>	<p>No project-specific mitigation would be required for noise generation because no development exists in the affected areas. Future development will require discretionary actions would involve environmental review. At that time, future development would be required to construct noise barriers sufficient to reduce noise levels to acceptable standards.</p>	<p>Yes</p>
<p>Geology and Soils</p> <p>The proposed development could be exposed to potentially significant geologic impacts. Alluvium deposits, expansive soil and the unconsolidated trash deposits from the previous landfill pose structural hazards to future buildings. The La Nacion Fault zone, clay and landslide deposits could adversely impact the proposed manufactured slopes.</p>	<p>A Soils Investigation would be completed to the satisfaction of the City Engineer which identifies remedial measures necessary to mitigate soils susceptible to settlement and assure the stability of large manufactured slopes. The Soils Investigation shall specify necessary remedial measures such as benching of manufactured slopes; planting of slope stabilizing landscaping; monitoring of settlement during construction; removal of existing fill soils, alluvium, and slope wash materials; proper compaction of replaced fill soils; and incorporating specifically-designed foundation systems. The City Engineer would assure that the approved remedial measures have been incorporated into the project's grading plan.</p>	<p>Yes</p>

**TABLE S-1
Significant Effects**

Impact	Mitigation Measures	Mitigated
Utilities		
Although water would be available to the site, improvements to the local water delivery system may be necessary to avoid significant water system impacts. All other utilities necessary for the project are considered adequate.	A water systems analysis would be prepared prior to recordation of the final map to determine if any improvements are necessary to serve the property. If improvements are required, the project proponent would install or otherwise guarantee that the improvements are accomplished.	Yes
Paleontology		
Grading for project development could result in significant impacts to paleontological resources. The Otay Formation found on the project site may contain significant fossil deposits.	Monitoring of the grading operation would be carried out by a qualified paleontologist in accordance with a City-approved monitoring plan. The paleontologist would have the authority to stop grading and undertake salvage, in the event significant fossil deposits are uncovered during grading.	Yes
Water Quality		
Development of the project would result in an increase in the urban runoff problems within the Otay and Tijuana River basins. During construction, uncontrolled surface runoff would create erosion and sedimentation problems. Once developed, runoff from future streets and parking areas would collect harmful materials such as oil, rubber, metals and trash. While insignificant in and of themselves, these impacts would have a cumulatively significant impact on water quality.	Surface runoff would be controlled during construction through the use of temporary detention/sedimentation basins, sand bags, etc. To mitigate the project's contribution to long-term water quality impacts, the Best Management Practices for Stormwater Pollution Control would be implemented.	Yes

TABLE S-2
Effects Found Not To Be Significant

Issue	Issue
Land Use (Brown Field)	Human Health/Public Safety (continued)
<p>The project site is located outside the airport influence area and beyond the flight activity zones. In addition, the project site lies outside of the 60 dB(A) noise contour. Thus, the project would not have any significant impacts associated with Brown Field.</p>	<p>from these deposits indicate that the material is non-hazardous and, thus, poses no significant public safety hazard.</p>
Visual Quality	Energy
<p>The project would not result in any significant obstruction of vistas or scenic views from surrounding public areas. The site is visible from a nearby park but is not considered a valuable scenic resource due to extensive disturbance resulting from offroad vehicle activity on the property. Views from I-805 are minimal as the freeway is at lower elevation than the property. The proposed commercial development would change the character of the area from vacant to developed land; however, the visual impact is not considered significant as the property possesses no high intrinsic visual quality.</p>	<p>No excessive amounts of fuel or energy would be consumed by the project. As discussed in air quality, the majority of the automobile trips associated with the project are related to shopping trips which would occur in the area whether or not this site is developed as a commercial center. In addition, the energy consumed by the operation of the center would not be significant.</p>
Cultural Resources	Housing
<p>Three prehistoric and one historic site have been recorded on the subject property. Subsequent testing and research of these sites have demonstrated that none of these sites are significant.</p>	<p>The proposed project site is designated for residential uses; however, the change to commercial use would not impact housing. Sufficient housing opportunities would exist in the Otay Mesa Community Plan area even with the proposed conversion. No impacts to existing or planned housing would occur from implementation of the proposed project.</p>
Human Health/Public Safety	Hydrology
<p>An incineration trash dump was operated on the site in the 1950s and early 1960s. Trash deposits from this operation occur on the property. However, extensive laboratory tests of samples taken</p>	<p>Project development would increase the volume of surface runoff from the site by approximately 24 cubic feet per second. Four existing offsite drainage structures would receive project runoff. The hydraulic analysis performed for the project indicates that these inlets and the associated storm drains would have excess capacity even with the proposed project and full development of the drainage basin.</p>

TABLE S-2
Effects Found Not To Be Significant

Issue	Issue
Light, Glare and Shading	
No impacts relative to lighting, glare or shading is anticipated.	
Natural Resources	
The project site does not possess any important natural resources beyond that associated with the vegetation. No aggregate material occurs on the site and the soils are not conducive to agriculture.	
Water Conservation	
Water-conserving fixtures would be utilized as required by the Uniform Building Code and drought tolerant landscaping would be planted to minimize water consumption associated with the development.	

I. INTRODUCTION

A. PURPOSE AND SCOPE OF THE EIR

This environmental impact report (EIR) is being prepared to provide a detailed analysis of the potential environmental impacts associated with development of the proposed Palm Plaza commercial center. The City of San Diego as Lead Agency will review and consider the EIR in making their decision to approve, revise or deny the proposed project.

The proposed Palm Plaza is a retail commercial center covering approximately 59.4 acres of an 87.7-acre site in Otay Mesa. Development would consist of approximately 617,000 square feet of commercial uses to be anchored by a Wal-Mart and Sam's Club discount department store. The site is located southeast of the terminus of Palm Avenue at Interstate 805 in the Otay Mesa Community Plan area.

B. CEQA REQUIREMENTS

Environmental Compliance

The California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code Section 21000 et. seq.) requires the preparation of EIRs or other environmental analysis for any project that a lead agency proposes to implement, unless it is specifically exempted by CEQA. According to Section 21002.1 of CEQA, "The purpose of an EIR is to identify the significant effects of a project on the environment, to identify alternatives to the project and to indicate the manner in which those significant effects can be mitigated or avoided". CEQA also serves to provide mechanisms whereby the public and decision-makers can be informed about the nature of the project being proposed and the extent and kinds of impacts that the project and alternatives would have on the environment if the project were to be implemented.

This EIR has been prepared in accordance with the requirements of the City of San Diego's environmental review procedures and complies with all criteria, standards and procedures of CEQA and the State CEQA Guidelines (California Administrative Code, Section 15000, et. seq.). This EIR has been prepared as a Project EIR as defined by Section 15161 of the CEQA Guidelines.

Scope of the EIR

The scope of the analysis for this EIR was determined by the City of San Diego and by responses to the Notice of Preparation (NOP) which was distributed by the City on October 23, 1992. The NOP and associated responses are included in Appendix A of this document. The following project issues were identified as potentially significant by the City and are

addressed in this EIR: Land Use, Visual Quality/Landform Alteration, Traffic, Biology, Air Quality, Noise, Geology/Soils, Utilities, Paleontology, Cultural Resources, Public Safety and Hydrology/Water Quality. For each of these topics, a discussion is presented of the existing conditions followed by identification of specific issues, potential impacts, identification of significance of those impacts and mitigation for the issues identified as significant.

Other sections required by CEQA and included in this document include a discussion of cumulative impacts, growth inducement and the relationship between local short-term use of the environment and enhancement of long-term productivity. A discussion of alternatives to the proposed project is also presented.

II. ENVIRONMENTAL SETTING

A. LOCATION

The proposed Palm Plaza commercial center is located approximately 11 miles southeast of downtown San Diego, approximately 5.6 miles inland from the Pacific Ocean and 1.5 miles from the international border (Figure II-1 and II-2). Brown Field is located 2.5 miles to the southeast.

The 87.7 acre project site is located southeast of the intersection of Interstate 805 (I-805) and the eastern extension of Palm Avenue within the Otay Mesa community planning area. It is bounded by I-805 on the west, Palm Avenue on the north, and undeveloped mesa tops and canyons on the east. Vacant land is immediately south of the project site, followed by State Route 905 (SR-905).

B. PHYSICAL CHARACTERISTICS

Project site topography consists of gradual to steep west-facing slopes descending from a higher mesa offsite to the east with three northwest trending drainages. A major drainage occurs in the northern portion of the site, running east to northwest. Drainage from this ravine is channeled underneath I-805. Highest onsite elevation is approximately 490-feet above mean sea-level (AMSL) on a ridgetop on the eastern property line in the southern portion of the site. Lowest onsite elevation is approximately 200-feet AMSL at the northwest corner. Soils in the area consist largely of loamy and gravelly sands on the lower edges of the property but are variable on the slopes and the ridge top in the southeastern corner.

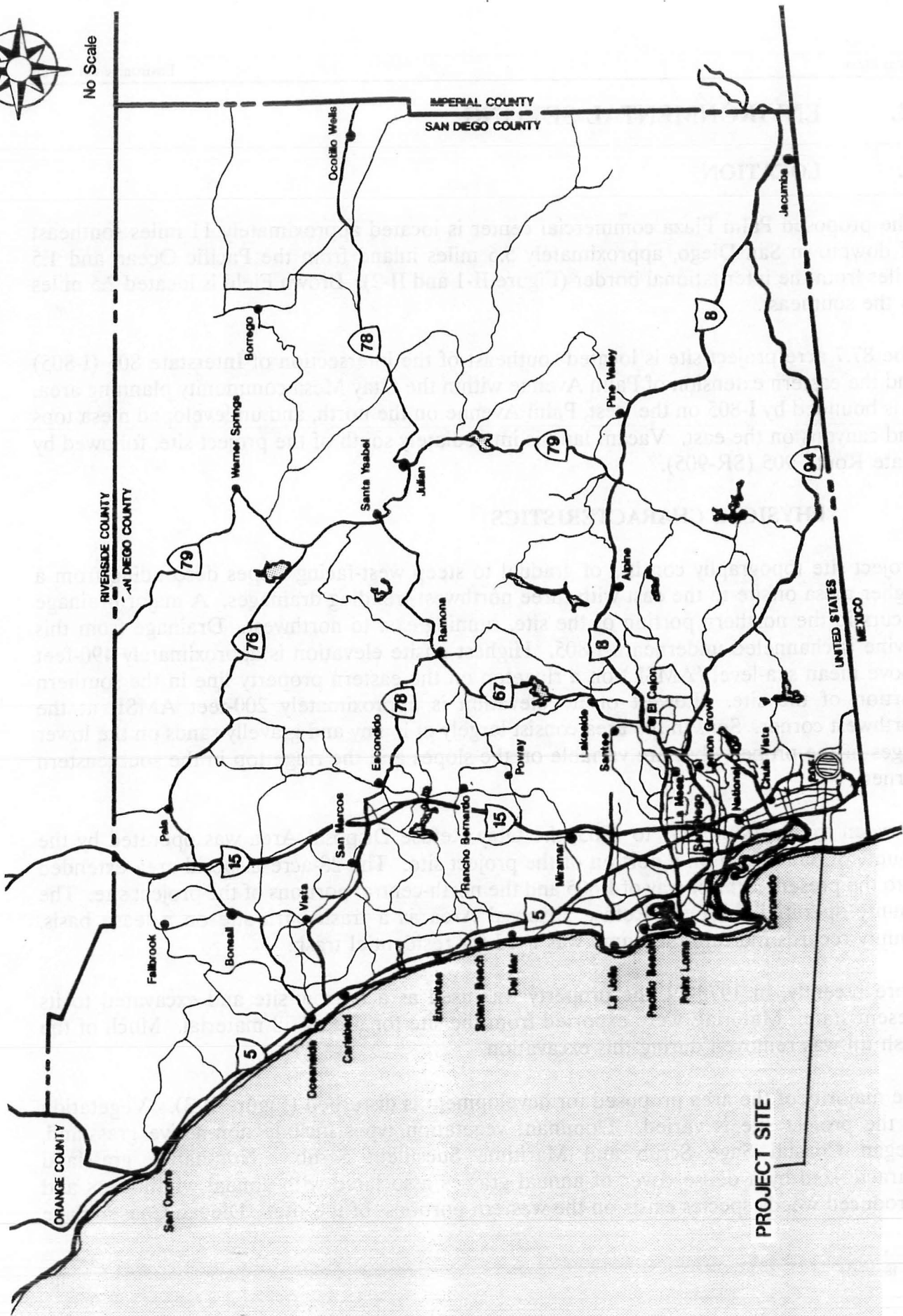
Between the years of 1951 to 1963, the Otay Refuse Disposal Area was operated by the County of San Diego on a portion of the project site. The 28-acre disposal area extended onto the present right-of-way of I-805 and the north-central portions of the project site. The County operated the Otay Refuse Disposal Area as a trash burn site on a lease basis. County records indicate the dump was used for residential trash.

More recently, in 1978-79, the property was used as a borrow site and excavated to its present state. Materials were exported from the site for use as fill material. Much of the trash fill was removed during this excavation.

The majority of the area proposed for development is disturbed (Figure II-3). Vegetation on the project site is varied. Dominant vegetation types include non-native grassland, Diegan Coastal Sage Scrub and Maritime Succulent Scrub. Non-native grassland characterized by a dense cover of annual grasses associated with annual wildflowers and introduced weedy species exists on the western portions of the site. Diegan Coastal Sage



No Scale



Regional Vicinity Map

Figure II-1

Scrub occupies north-facing slopes and the ravine in the northern area. Maritime Succulent Scrub is found on south-facing slopes in the eastern portion of the site.

C. SURROUNDING LAND USES

Mixed residential and commercial development currently exist to the west and southwest of I-805 in the Otay-Nestor and San Ysidro Communities of San Diego, as well as within the City of Chula Vista to the northwest. Land to the east and south is undeveloped. Brown Field, a general aviation airport, is five miles to the southeast within Otay Mesa. North of Palm Avenue is the approved Gateway Fair project, a 31-acre vacant site with 260,300 square feet of commercial development. Land immediately east is proposed for residential development as part of the California Terraces development.

D. APPLICABLE PLANS AND POLICIES

The City Progress Guide and General Plan designates this portion of Otay Mesa as Planned Urbanizing. Land uses onsite are governed by the Otay Mesa Community Plan, adopted in August, 1981. The project site lies outside of the Coastal Zone and also outside of the influence area for Brown Field as designated in the Brown Field Comprehensive Land Use Plan. The Otay Mesa Community Plan designates the site and surrounding areas as Low Density Residential, 0 to 5 dwelling units per acre.

The property is currently zoned A-1-10, Agriculture, 1 dwelling unit per 10 acres. This is a temporary zone for lands in planned urbanizing areas that are presently in agriculture or open space use or which are undeveloped.

The Resource Protection Ordinance (RPO) applies to the project site and implements the Hillside Review Overlay Zone (HROZ). Portions of the northern ravine and some of the slopes in the southern and eastern portion of the property are within the HROZ. It is the intent of the overlay zone to encourage a sensitive form of development which compliments the natural and visual character of the hillsides. RPO is intended to preserve and protect environmentally sensitive lands including flood plains, steep slopes, sensitive biological resources and unique cultural resources. The ordinance establishes specific encroachment limitations into these resource areas.



5 Aerial Photograph _____ Figure II-3

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III. PROJECT DESCRIPTION

A. PURPOSE/OBJECTIVES OF THE PROPOSED PROJECT

The proposed project would provide a regional shopping center to serve the Otay Mesa and surrounding communities. The center would provide new commercial uses anchored by a Wal-Mart discount department store and a Sam's Club membership wholesale store. Additional commercial space would be available for lease to a variety of users.

B. PROJECT BACKGROUND/RELATED ENVIRONMENTAL DOCUMENTATION

Previous development proposals that included the subject site include the Palm Vistas Estates Project and the South Palm Precise Plan-Palm Ridge IV Tentative Map/Planned Residential Development. Both projects involved residential development and included environmental work (EQD No. 85-0825 and DEP No. 90-0351, respectively). However, the EIRs were never certified.

C. PROJECT CHARACTERISTICS

Site Plan

The Palm Plaza commercial center is intended to accommodate regional shopping needs in the Otay Mesa and surrounding area. Approximately 617,000 square feet of commercial use is proposed on 59.4 acres adjacent to I-805. The center would be anchored by a Wal-Mart and a Sam's Club store. Additional retail stores would be located within the shopping center.

A site plan has been prepared for the project which displays the lot layout, building location and parking areas (Figure III-1). The boundaries of the site plan encompass a total area of approximately 87.7 acres of which approximately 59.4 acres would be occupied by the commercial development and "A" Street; the remaining 25 acres, east of "A" Street would be in natural open space or revegetated manufactured slope. Table III-1 provides a summary of the amount of commercial development by parcel.

The majority of commercial buildings would be located toward the western property line bordering I-805. Approximately 500-feet of this western exposure would be parking area. The majority of parking, however, would be located between the buildings and "A" Street.

Seven smaller freestanding building pads (maximum building area 10,000-square feet each) would be located closer to "A" Street. The two anchor tenants, Wal-Mart and Sam's Club, would be located toward the north and southern ends of the property, respectively. The

remaining acreage east of "A" Street, including steep slope areas, would be placed in open space.

Parking

Approximately 3,675 surface parking spaces would be provided for an overall parking ratio of 5.96 parking spaces per 1,000 square feet. Of the total parking supply, 16 spaces are provided at the back of the site behind the 55,000-square-foot retail building at the north end, and 72 spaces are located between the proposed Wal-Mart store and the 40,000 square-foot retail building to the south. An additional 10 aisles of parking are located between Sam's Club and the retail buildings to the north. Approximately 600 spaces would be provided for the freestanding buildings fronting "A" Street (Pads A through I). The remaining spaces are located in the center of the lot in front of the main retail buildings.

TABLE III-1
Proposed Site Plan Statistics

Parcel	Site Area (Gross Acres)	Square Footage	Parking Spaces	Parking Ratio (/1,000 SF)
Wal-Mart with expansion	12.59	154,809	856	5.53
Sam's Club with expansion	15.49	164,900	969	5.88
Retail I	5.53	55,000	303	5.51
Retail II	3.54	31,000	172	5.55
Retail III	13.48	145,800	802	5.50
Pad A	1.03	6,000	61	10.17
Pad B	0.72	7,000	42	6.00
Pad C	0.69	7,000	40	5.71
Pad D	1.05	6,500	82	12.62
Pad E	0.95	10,000	61	6.10
Pad F	0.96	7,000	68	9.71
Pad G	1.19	9,000	92	10.22
Pad H	0.97	7,000	68	9.71
Pad I	0.95	6,000	58	9.67
Totals	59.40	617,009	3,674	5.95



VICINITY MAP

WAL-MART LEGEND

HEAVY DUTY PAVEMENT	---
HEAVY DUTY CONCRETE	---
STANDARD DUTY PAVEMENT	---
CONCRETE SIDEWALK	---
CURB CORRAL	---
EXPANDED STOP SIGN	---
PEDESTRIAN CROSSING STRIPING	---
PAVEMENT MARKING	---
PAVEMENT MARKING	---
PAVEMENT MARKING	---
PAVEMENT MARKING	---
PAVEMENT MARKING	---

BENCHMARK

BENCH MARK: STATIONED 100+00 AT THE INTERSECTION OF PALM AVE AND INTERSTATE 805. THE BENCHMARK IS A 10' X 10' X 10' CONCRETE PIERCEMENT MARKER SET IN THE GROUND.

LEGEND

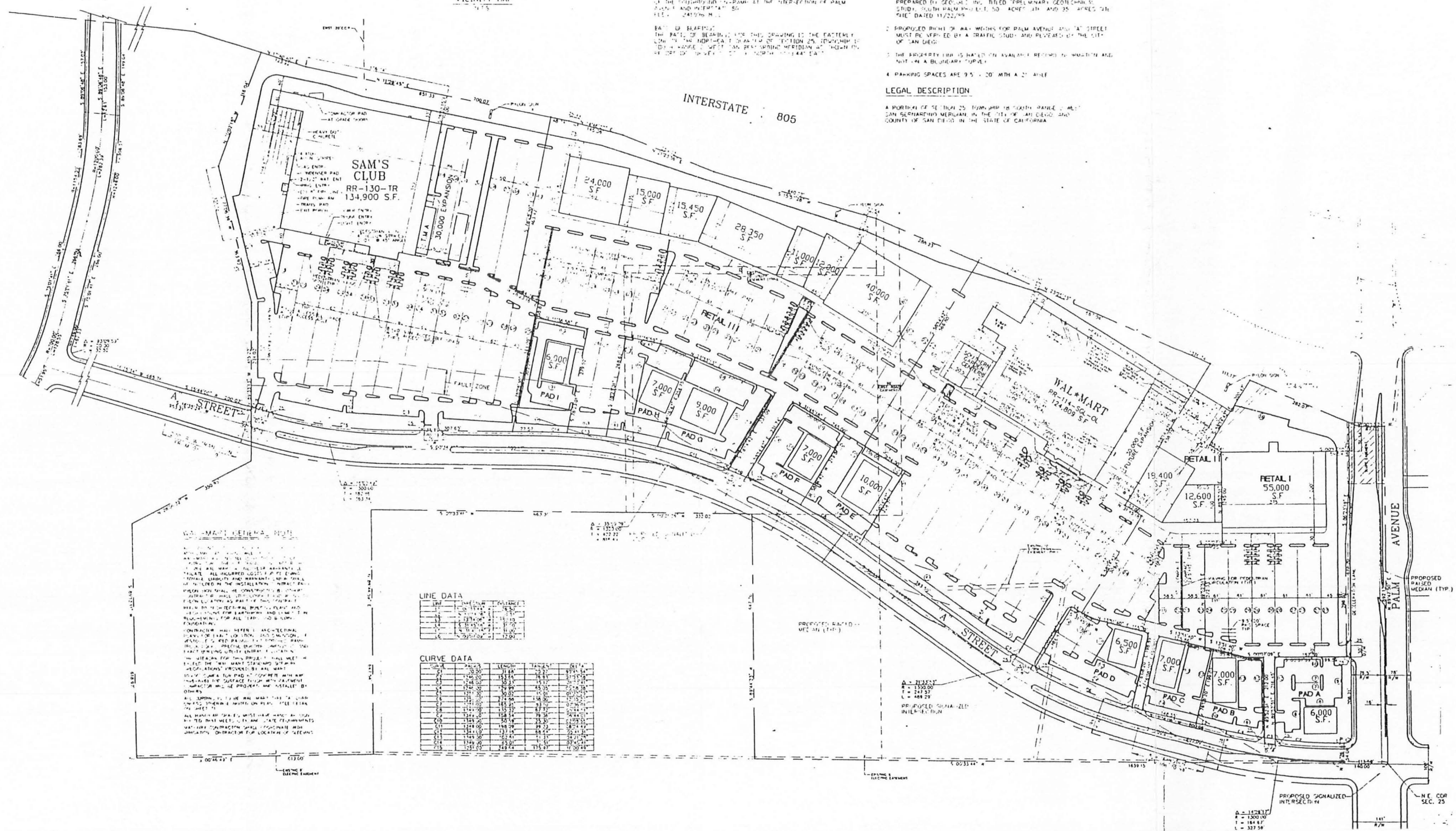
---	PROPERTY BORDER
---	EASEMENT
---	LA NADON FAULT LINE
---	EXISTING FENCE
---	PARKING SPACES PROVIDED PER PLAN
---	PEDESTRIAN CROSSING STRIPING
---	EXISTING PRIVATE POLE

NOTES

1. THE FAST LINE SHOWN ON THIS EXHIBIT IS BASED ON A REPORT PREPARED BY GEOLAND INC. TITLED "PRELIMINARY GEOTECHNICAL STUDY, SOUTH PALM AVENUE, 50' ACRES, 141' AND 35' ACRES, 216' ACRES, DATED 11/22/99.
2. PROPOSED RIGHT OF WAY WIDTHS FOR PALM AVENUE AND AT STREET MUST BE VERIFIED BY A GRADE STUDY AND REVEALED BY THE CITY OF SAN DIEGO.
3. THE EXISTING CURB IS BASED ON AVAILABLE RECORDS IN THE CITY AND NOT ON A BUREAU SURVEY.
4. PARKING SPACES ARE 9'5" X 20' WITH A 2' WHEEL.

LEGAL DESCRIPTION

A PORTION OF SECTION 25, TOWNSHIP 10 NORTH, RANGE 1, AND SAN GABRIEL MERIDIAN IN THE CITY OF SAN DIEGO AND COUNTY OF SAN DIEGO IN THE STATE OF CALIFORNIA.



One dead-end parking aisle is provided in Pad F in which case, a turn-around feature is provided to facilitate maneuvering out of the area.

Traffic Circulation

Regional access to the site would be supplied by I-805. Local access to the site would be from Palm Avenue bordering the site on the north and the proposed "A" Street to the east. Palm Avenue would be extended from its current terminus just east of I-805 to the intersection of "A" Street. "A" Street would be constructed along the project site between Palm Avenue and Del Sol. A portion of Del Sol Boulevard between "A" Street and I-805 would also be constructed. "A" Street would transition from a 102-foot right-of-way at its intersection with Palm Avenue to a 92-foot right-of-way through the subject property.

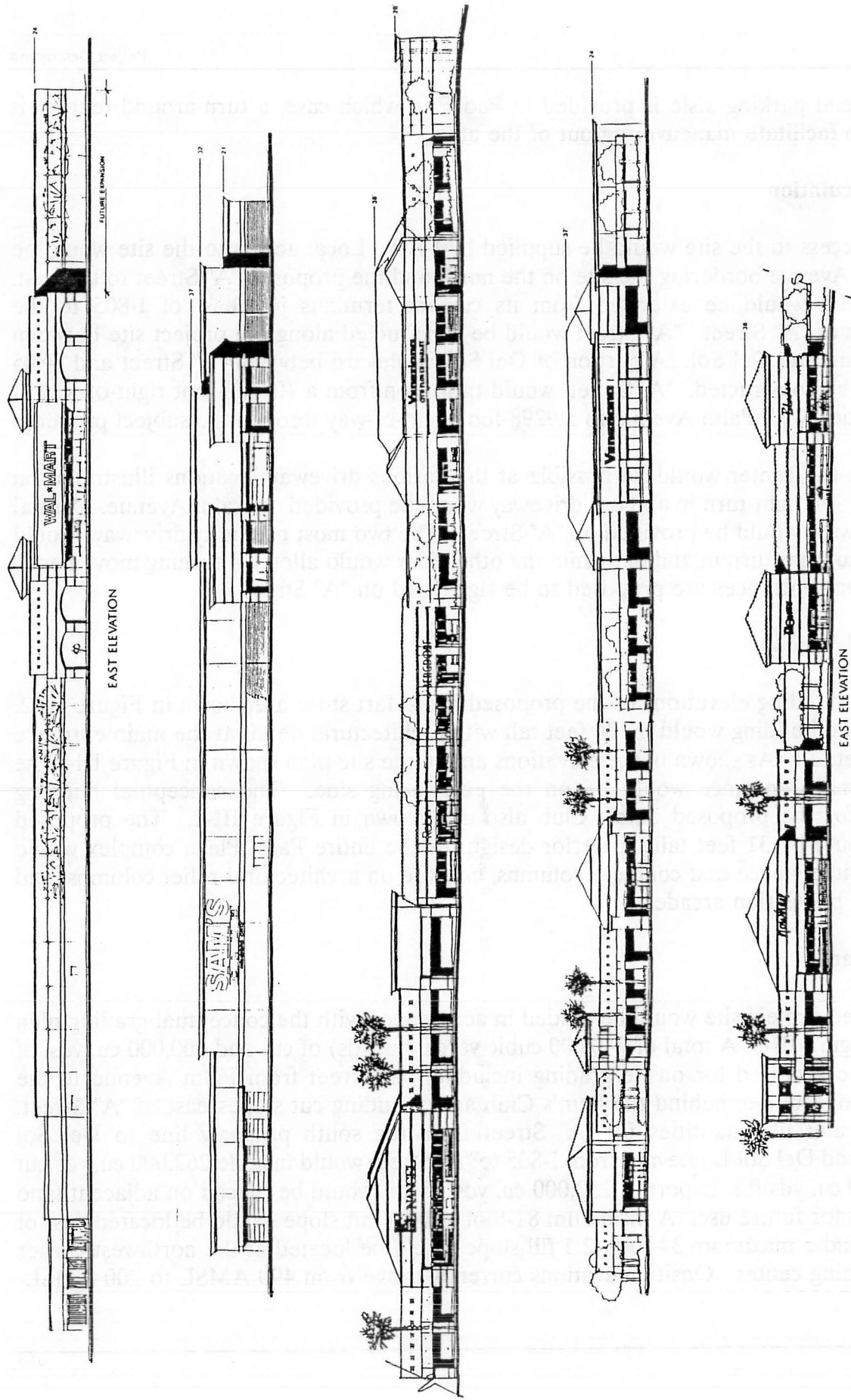
Access into the center would be possible at the various driveway locations illustrated on Figure III-1. A right-turn in and out driveway would be provided on Palm Avenue. A total of six driveways would be provided on "A" Street. The two most northerly driveways would be limited to right-turn in and out while the other four would allow all turning movements. Two driveway entrances are proposed to be signalized on "A" Street.

Building Elevations

Conceptual building elevations of the proposed Wal-Mart store are shown in Figure III-2. The proposed building would be 26 feet tall with architectural detail at the main entrance being 36 feet tall. As shown in the elevations and in the site plan shown in Figure III-2 the Wal-Mart main entrance would be on the east facing side. The conceptual building elevations for the proposed Sam's Club also are shown in Figure III-2. The proposed building would be 31 feet tall. Exterior design for the entire Palm Plaza complex would include painted stucco and concrete columns, clay tile on architectural relief columns, and arches over pedestrian arcades.

Grading Plan

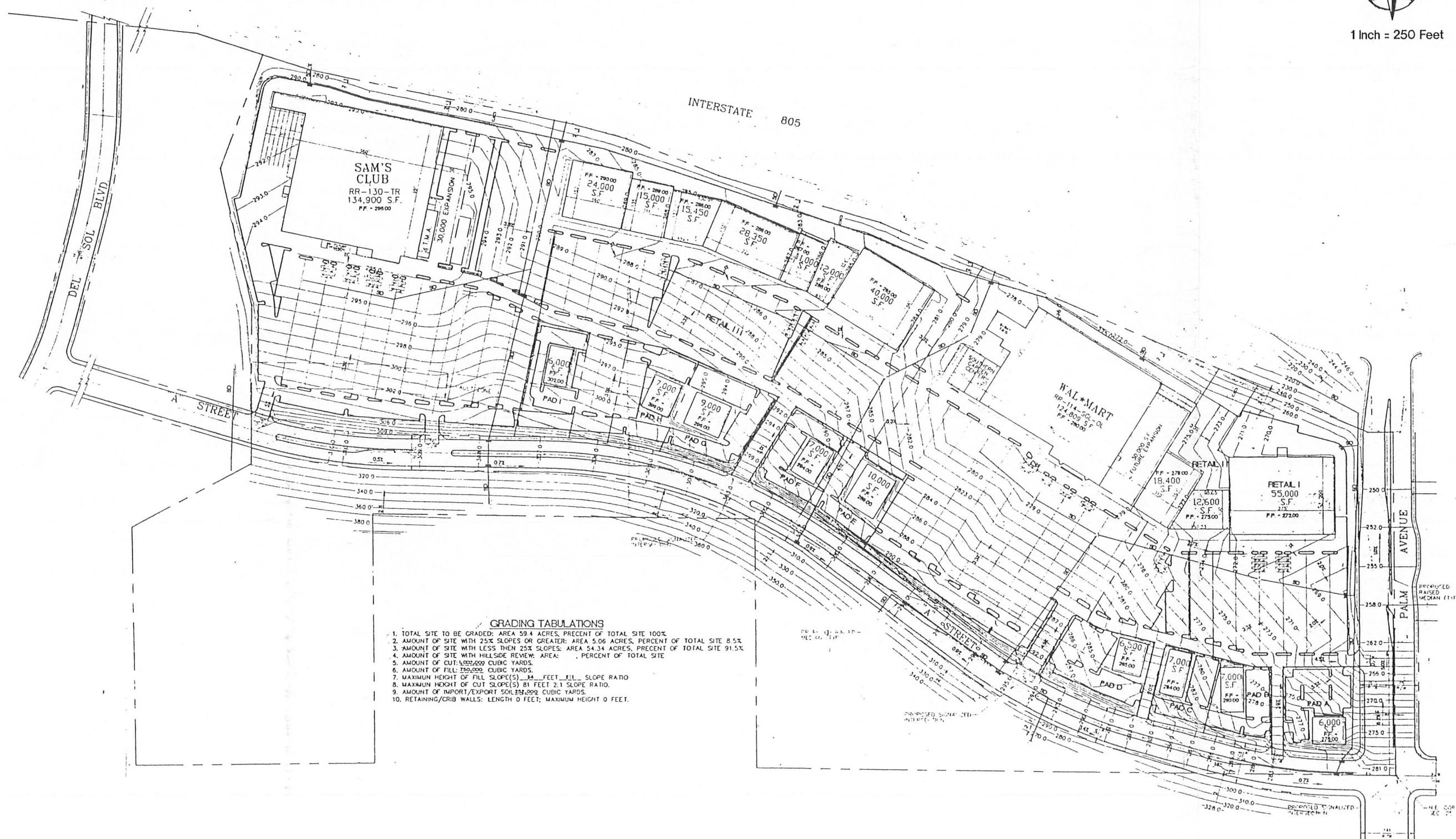
The proposed project site would be graded in accordance with the conceptual grading plan shown in Figure III-3. A total of 740,000 cubic yards (cu. yds) of cut and 600,000 cu. yds. of fill would be required for onsite grading including "A" Street from Palm Avenue to the southern property line behind the Sam's Club and including cut slopes east of "A" Street. Offsite cut and fill quantities for "A" Street from the south property line to Del Sol Boulevard and Del Sol Boulevard from I-805 to "A" Street would include 262,000 cu. yds cut and 150,000 cu. yds fill. Export of 252,000 cu. yds of soil would be placed on adjacent land to the south for future use. A maximum 81-foot tall 2:1 cut slope would be located east of "A" Street and a maximum 34-foot, 2:1 fill slope would be located at the northwest corner of the shopping center. Onsite elevations currently range from 490 AMSL to 200 AMSL.



SOURCE: Krommehock McKown & Associates



1 Inch = 250 Feet



and would ultimately range from 300 feet above mean sea level (AMSL) in the southeastern portion of the site to approximately 270 feet AMSL in the northwestern corner.

Landscape Plan

Figure III-4 is a conceptual landscape plan for the proposed project site. The landscape plan has been developed in accordance with the City's Land Development Ordinance, Landscape Ordinance and the Otay Mesa Community Plan. The overall goals of the landscape plan are to screen undesirable views (such as storage, loading and utility areas) and provide interest to the site and architectural enhancement of the buildings.

Vehicular entrances will be identified and accented with special groupings of trees, shrubs and low groundcover. Permanently landscaped areas would be served by permanent automatic underground irrigation systems. A plant palette of trees, shrubs and groundcover species is provided in Figure III-4.

Tentative Map

The proposed project would result in the creation of 14 commercial lots: the proposed Wal-Mart site, Sam's Club site, Retail Centers I, II and III, and Pads A through I as shown on the project site plan, Figure III-5. The gross site area for each lot is summarized in Table III-1 above. "A" Street and the open space areas to the east would be additional lots.

PLANT LEGEND

PARKWAY TREES

24" BOX MIN. SUCH AS: BOTANICAL NAME	COMMON NAME
CUPANOPSIS ANACARDIOIDES	CARROT WOOD
ERYTHRINA CORALLOIDES	NAKED CORAL TREE
LIQUIDAMBAR STYRACIFLUA 'FESTIVAL'	AMERICAN SWEETGUM
PLATANUS ACERIFOLIA 'BLOODGOOD'	LONDON PLANE TREE
PLATANUS RACEMOSA	CALIFORNIA SYCAMORE
PODOCARPUS GRACILIOR	FERN PINE
SCHINUS TEREBINTHIFOLIUS	BRAZILIAN PEPPER
WASHINGTONIA ROBUSTA	MEXICAN FAN PALM

PARKING LOT TREES

24" BOX MIN. SUCH AS: BOTANICAL NAME	COMMON NAME
CASSIA SPECIES	SEMA
CUPANOPSIS ANACARDIOIDES	CARROT WOOD
PODOCARPUS GRACILIOR	FERN PINE
PITTOSPORIUM RHOMBIFOLIUM	VICTORIAN BOX
PYRUS KAWAKAWI	EVERGREEN PEAR
SCHINUS TEREBINTHIFOLIUS	BRAZILIAN PEPPER

PARKING LOT ACCENT TREES

24" BOX MIN. SUCH AS: BOTANICAL NAME	COMMON NAME
BRACHYCHITON SP.	BOTTLE TREE
KOELREUTERIA PANICULATA	GOLDENRAIN TREE
LAGERSTROEMIA INKICA	GRAPE MYRTLE
LIQUIDAMBAR STYRACIFLUA 'FESTIVAL'	AMERICAN SWEETGUM
LIRODENDRON TULIPIFERA	TULIP TREE
PYRUS CALLERYANA	BRADFORD
WASHINGTONIA ROBUSTA	MEXICAN FAN PALM

SCREENING TREES

24" BOX MIN. SUCH AS: BOTANICAL NAME	COMMON NAME
CUPANOPSIS ANACARDIOIDES	CARROT WOOD
EUCALYPTUS LEHMANII	BUSHY YATE
PHILUS SPECIES	PHIES
PODOCARPUS GRACILIOR	FERN PINE
SCHINUS TEREBINTHIFOLIUS	BRAZILIAN PEPPER
TRISTANIA CONFERTA	BRISBANE BOX

BUILDING ACCENT TREES

24" BOX MIN. SUCH AS: BOTANICAL NAME	COMMON NAME
ARECASTRUM ROMANZOFFIANUM	QUEEN PALM
BALHINA VARIEGATA	PURPLE ORCHID TREE
BRACHYCHITON SP.	BOTTLE TREE
CHAMAEROPS HUMILIS	MEDITERRANEAN FAN PALM
LAGERSTROEMIA INKICA	GRAPE MYRTLE
LIQUISTRUM JAPONICUM 'TEXANUM'	TEXAS PRIVET
STRELITZIA NICOLAI	GIANT BIRD OF PARADISE

SHRUBS

80% 1 GAL., 40% 5 GAL. SUCH AS: BOTANICAL NAME	COMMON NAME
AGAPANTHUS AFRICANUS	LILY-OF-THE-NILE
BOUGAINVILLEA 'CRIMSON JEWEL'	NCN
BUXUS MICROPHYLLA JAPONICA	JAPANESE BOXWOOD
CARISSA MACROCARPA 'PROSTRATA'	PROSTRATE NATAL PLUM
DIETES BICOLOR	FORTNIGHT LILY
HEMEROCALLIS HYBRIDS	DAYLILY
LIQUISTRUM JAPONICUM	JAPANESE PRIVET
LIROPE MUSCARI	BIG BLUE LILY TURF
MELALEUCA NESOPHILA	PINK MELALEUCA
MYOPORIUM PARYFOLIUM	NCN
NANDINA DOMESTICA	HEAVENLY BAMBOO
PHORMIUM TENAX 'ATROPURPUREUM'	NEW ZEALAND FLAX
PHOTNIA FRASERI	NCN
PITTOSPORIUM TOBIRA	TOBIRA
RAPHIOLEPIS INKICA 'PINK LADY'	INDIA HAWTHORN
STRELITZIA NICHOLII	GIANT BIRD OF PARADISE
STRELITZIA REGINAE	BIRD OF PARADISE
XYLOSMA CONGESTUM	SHINY XYLOSMA

SCREENING SHRUBS

TO BE USED ADJACENT TO PARKING LOTS AND AT REAR OF BUILDINGS FOR SCREENING 8 GAL. SUCH AS: BOTANICAL NAME	COMMON NAME
LIQUISTRUM JAPONICUM	JAPANESE PRIVET
PHOTNIA FRASERI	NCN
PITTOSPORIUM TOBIRA	TOBIRA
RAPHIOLEPIS INKICA 'PINK LADY'	INDIA HAWTHORN
XYLOSMA CONGESTUM	SHINY XYLOSMA

GROUND COVER

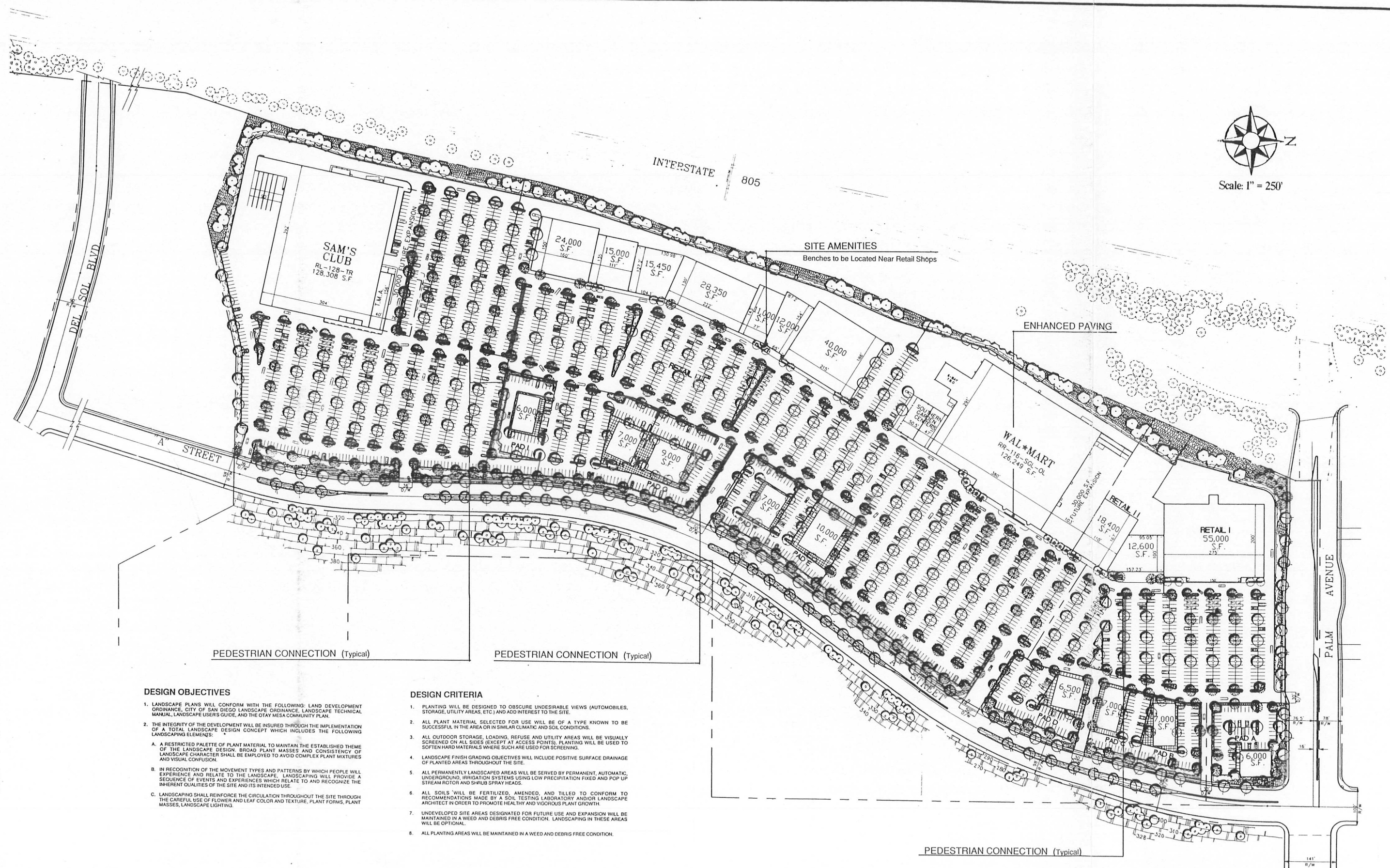
FROM FLATS SUCH AS: BOTANICAL NAME	COMMON NAME
CARISSA MACROCARPA 'GREEN CARPET'	PROSTRATE NATAL PLUM
HEDERA HELIX 'CALIFORNIA'	CALIFORNIA IVY
HYPERICUM CALYCEUM	CREeping ST. JOHN'SWORT
IMPATIENS WALLERIANA-WHITE, BRIGHT PINK	BUSY LIZZIE
LYSMACHIA NUMMULARIA	CREeping MONEYWART
PELARGONIUM PELTATUM 'LIGHT PINK'	IVY GERANIUM
TRACHELOSPERMUM JASMINODES	STAR JASMINE

VINES

1 GAL. SUCH AS: BOTANICAL NAME	COMMON NAME
BOUGAINVILLEA 'BARBARA KARST'	NCN
CLYTOSTOMA CALLISTEGOIDES	VIOLET TRUMPET VINE
DISTICTUS 'RIVERS'	ROYAL TRUMPET VINE
GELSEMIUM SEMPERVIRENS	CAROLINA JESSAMINE
PARTHENOCISSUS TRICUSPIDATA	BOSTON IVY

HYDROSEED

BOTANICAL NAME	COMMON NAME
ARTEMISIA CALIFORNICA	CALIFORNIA SAGEBRUSH
ATRIPLEX SEMBACATA	AUSTRALIAN SALT BUSH
BACCHARIS SARTHOODES	COYOTE BUSH
ENCELIA CALIFORNICA	CALIFORNIA SUNFLOWER
ERIOGONUM FASCICULATUM	CALIFORNIA BUCKWHEAT
ESCHOLZIA CALIFORNICA	CALIFORNIA POPPY
FESTUCA MEGALURA	ZORRO FESCUE
LOTUS SCORPIUS	DEERWOOD
LUPINUS SPECIES	ANNUAL LUPINE
MIMULUS LONCHITRIS	MONKEYFLOWER
MIMULUS PUNICEUS (DIPLACUS PUNICEUS)	RED MONKEYFLOWER
RAUS HYDROPHILA	LEMONADE BERRY
RHUS LAURINA	LAUREL SUMAC
RHUS OVATA	SUGAR BERRY
SALVIA APIANA	WHITE SAGE
SALVIA MELIFERA	BLACK SAGE
VERBENA PERUVIANA	PERUVIAN VERBENA
VIOLIERA LACINATA	SAN DIEGO SUNFLOWER
ZAUSCHNERIA SPECIES	CALIFORNIA FUSCHIA

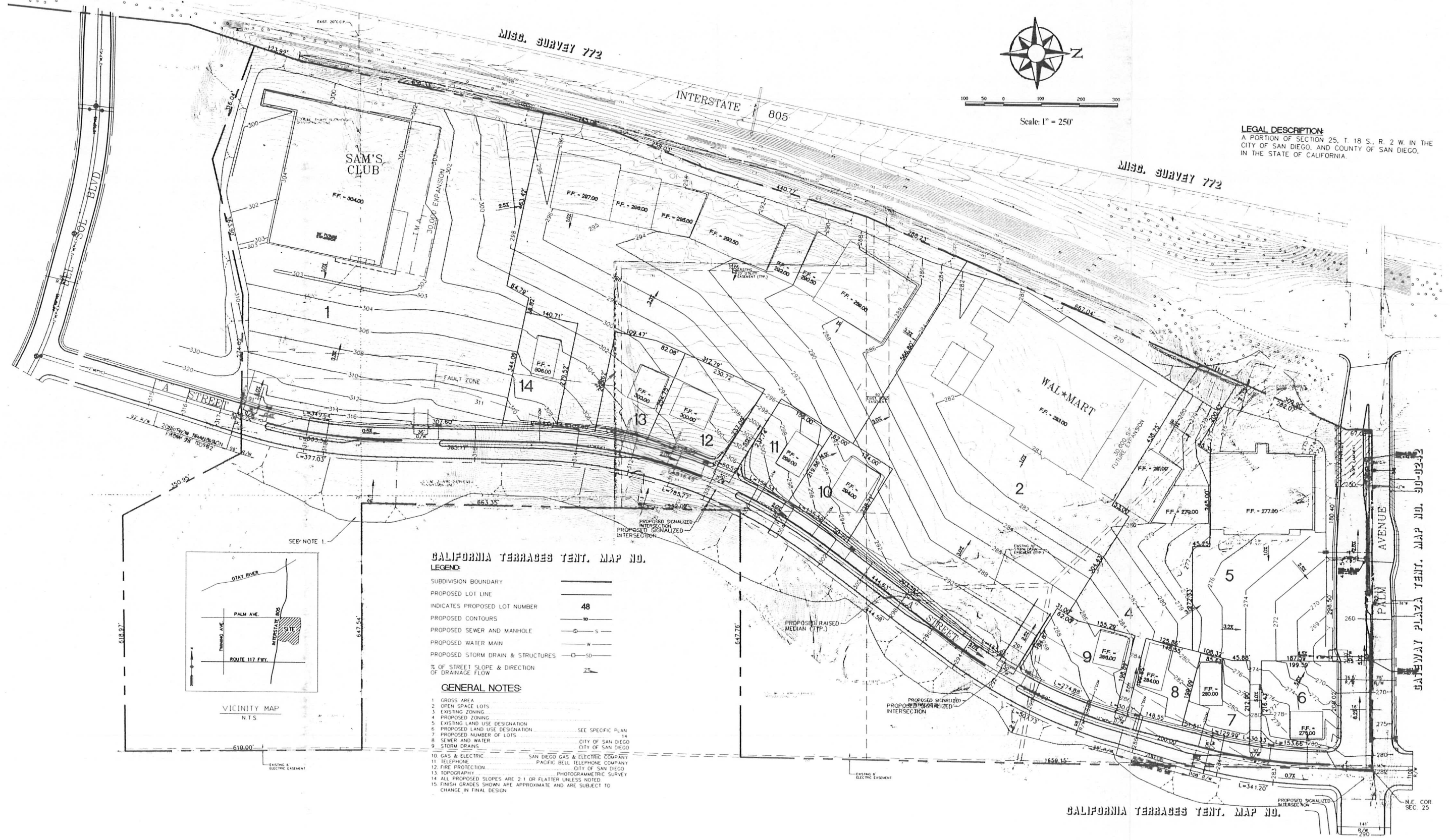


D. PROPOSED DISCRETIONARY ACTIONS

The proposed actions, required discretionary actions and responsible agency for implementing the discretionary actions are listed in Table III-2.

TABLE III-2
Discretionary Actions

Proposed Action	Discretionary Action	Responsible Agency
Change in land use designation from residential to commercial	Community Plan Amendment/ General Plan Amendment	City of San Diego
Comprehensive review of multiple, phased commercial uses	Planned Commercial Development Permit	City of San Diego
Change in zoning from A-1-10 to CA	Rezone	City of San Diego
Grading on slopes greater than 25 percent	Resource Protection Ordinance Permit (Hillside review Permit)	City of San Diego
Automobile Service station	Conditional Use Permit	City of San Diego
Discharge of runoff	NPDES Permit	Water Quality Control Board
Commercial lot subdivision	Tentative Map	City of San Diego
Site grading	Land Development Permit	City of San Diego
California Gnatcatcher take	Section 7 or 10A permit	U.S. Fish & Wildlife



IV. ENVIRONMENTAL ANALYSIS

A. LAND USE

Existing Conditions

Present Uses

The 87.7-acre project site is currently vacant and exhibits heavy use by off-road-vehicles. The land surrounding the site is also vacant although several developments are proposed in the area (see discussion under Otay Mesa Community Plan, below). To the west, across I-805, are the residential areas of Otay Mesa and Otay Mesa-Nestor in the City of San Diego. A gas station and neighborhood commercial uses are located on the northwest corner of the intersection of Palm Avenue and I-805. A park is located at the southwest corner of the intersection. The City of Chula Vista lies to the north and northwest of the Otay River valley, north of the site.

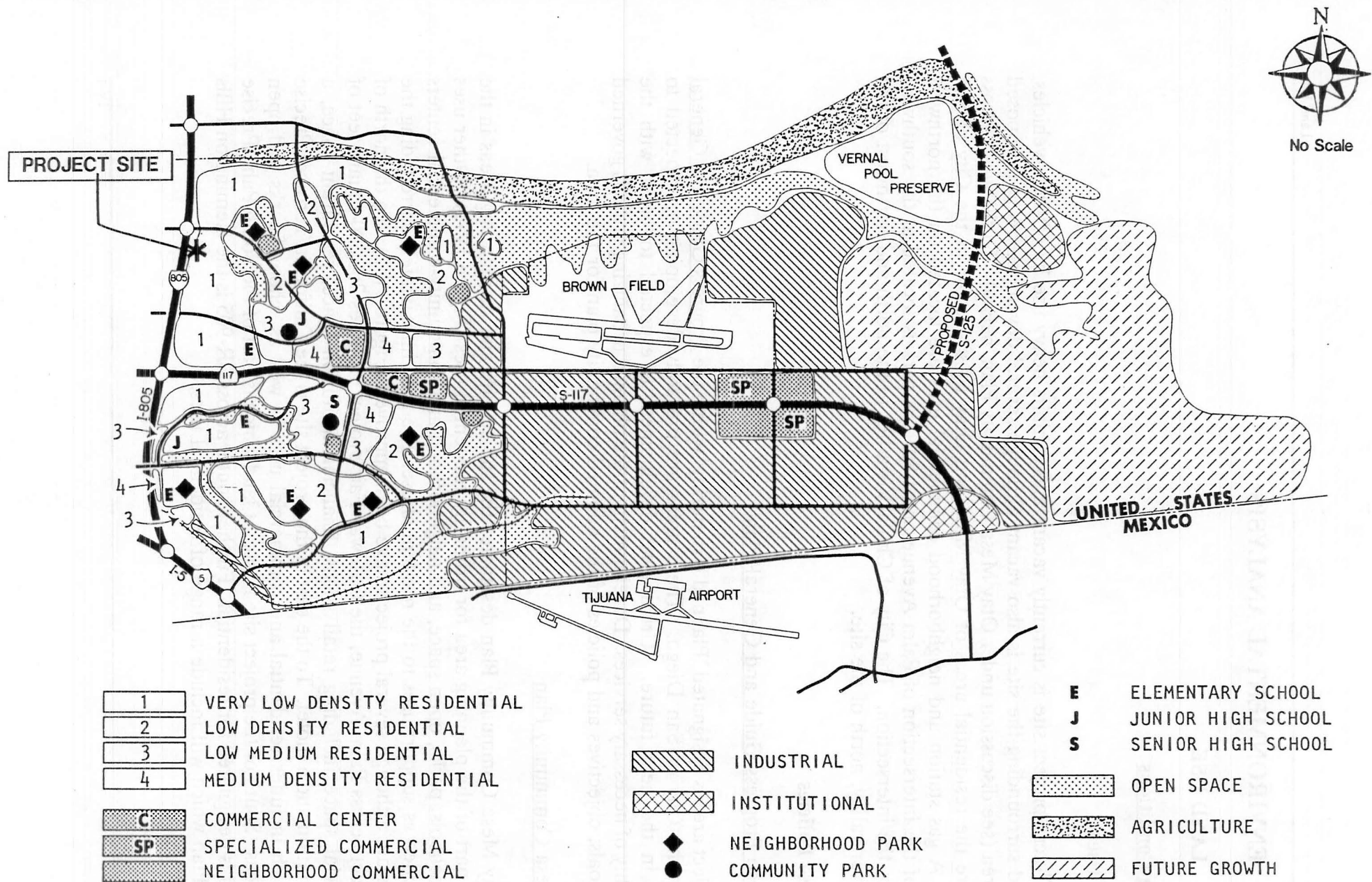
Land Use Policies

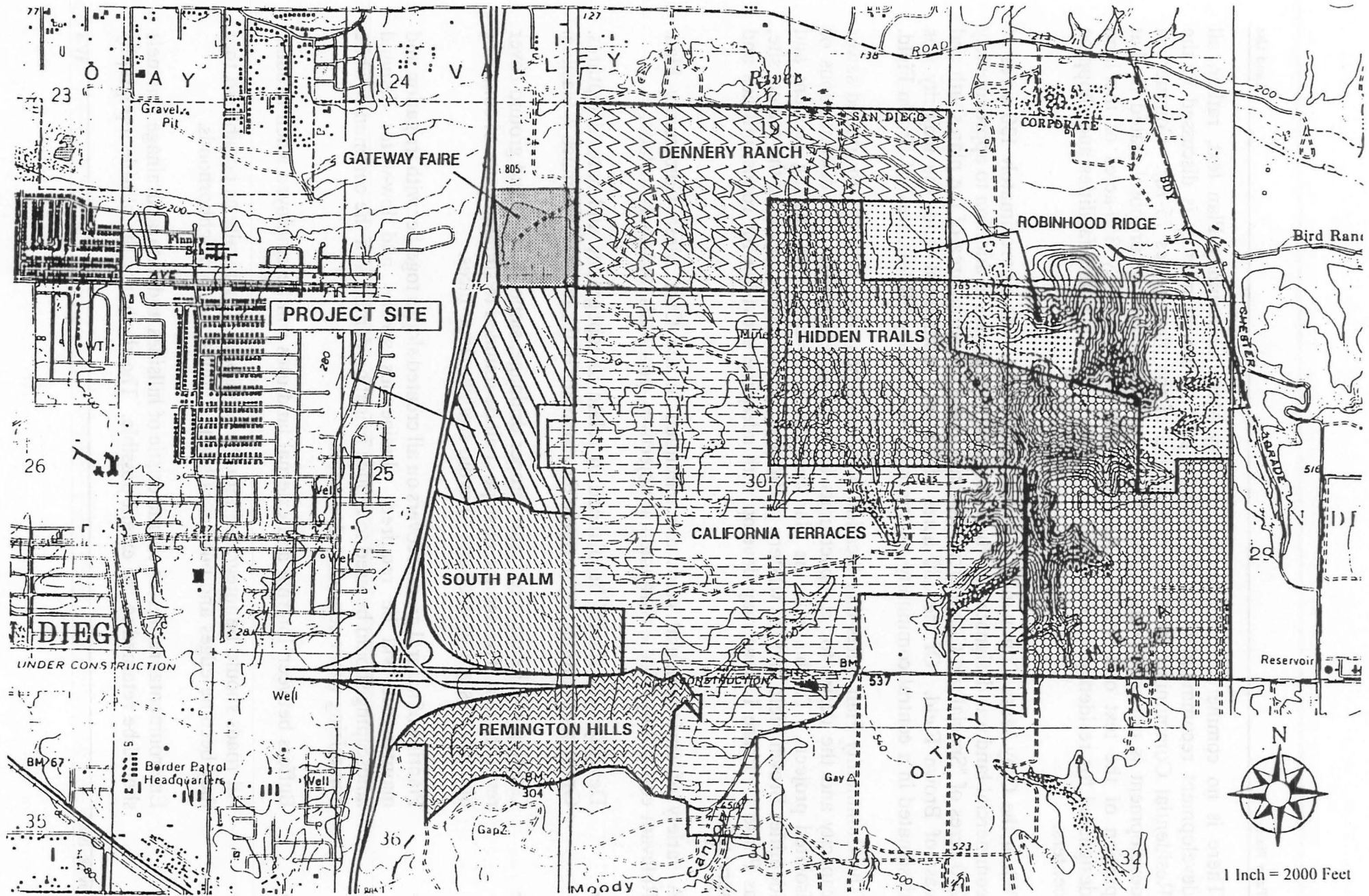
San Diego Progress Guide and General Plan

The project area is designated "Planned Urbanizing" within the Progress Guide and General Plan for the City of San Diego. These areas are presently developing or expected to develop in the near future. Urban-level development is expected to occur with the availability of necessary services. Development of the planned urbanizing areas is governed by the goals, objectives and policies of the adopted community plan for the area.

Otay Mesa Community Plan

The Otay Mesa Community Plan designates the subject site and surrounding areas in the western part of the planning area for primarily residential uses (Figure IV-1). Other uses such as schools, parks, open space, and neighborhood and community-commercial centers are included as support uses to the residential use. The area immediately surrounding the site is vacant although several projects have been approved (Figure IV-2). To the north of the project across Palm Avenue, the Gateway Fair project proposes 260,300-square feet of commercial space including retail shops, financial institution space, restaurant space, a service station and a motel. To the east of the project site is the California Terraces Precise Plan which includes residential and commercial uses as well as schools, parks and open space areas. South of the project site is vacant land which is part of the South Palm Precise Plan and is designated for residential. Further south, across SR-905 is the Remington Hills Precise Plan which will include a range of residential uses.





There is no commercial element in the Otay Mesa Community Plan text, rather, all development recommended for the western part of the community is discussed in the Residential Communities and Housing portion of the plan (pages 75-78). Commercial development is not specifically guided by any goal, objective or proposal stated in that portion of the text other than a statement that approximately 360-acres of the land designated for residential communities will be required for public facilities and shopping centers.

When the Otay Mesa Community Plan was adopted in 1981, approximately 130 acres of commercial land was designated on the Community Plan map, in addition to approximately 230 acres of "Specialized Commercial" located in the industrial area of the plan south and east of Brown Field. Of the 130 acres of general commercial land, the majority was designated in a central community commercial center along SR-905, west of Brown Field.

The Community Plan states that location of development is critical due to limited sewer capacity and the desire for compact units of development rather than discontinuous or isolated projects. To this end, the plan includes a Development Phasing element and identifies Brown Field and the western portions of the plan area, including the project site, as Phase I. Phase I areas may develop with adequate provision for roads, utilities and services.

A variety of environmental goals are identified in the Otay Mesa Community Plan. Relevant community-wide environmental objectives, proposals and goals include:

- Development should be planned to relate to topography and natural features. Grading operations are to retain the character of the landform as much is feasible.
- Grading will be done to insure proper drainage, slope stability and ground cover revegetation. Top and toe of slope shall be rounded to simulate natural contours. Slope banks are to undulate to avoid straight slope faces.
- Planting of natural ground covers on all created slopes together with irrigation and maintenance will be required. Indigenous species and low-water demand landscaping should be used to reduce irrigation demands of the community while minimizing water run-off and erosion.
- Buffers between internal and external land uses will be employed when needed.
- All roads should be integrated into the landform as naturally as possible so that they become edges and buffers rather than divisions to neighborhoods.
- Environmental resources characteristic of hillsides and natural drainage channels should be retained to the extent possible. The rhythm of the hillside topography

and profiles should be complemented by the roof lines and rhythm of building silhouettes.

- Commercial areas should avoid repetitive appearance. Different but compatible facades should be used on commercial storefronts. Shopping centers should provide common parking areas for all businesses and these parking areas should be well landscaped. Linear placement of buildings within shopping centers should be avoided. Interesting and compatible shapes of buildings should be encouraged and the square or "box-look" avoided. A variety of colors, materials and textures should be used on building exteriors within commercial areas.

City of San Diego Zoning

The proposed project is within the A-1-10 (Agriculture) zone, a temporary zone for lands within planned urbanizing areas. Development within this zone is permitted at a density of one residential unit per ten acres.

Resource Protection Ordinance

The Resource Protection Ordinance (RPO) is an additional level of review. The RPO limits encroachment into steep hillsides, biologically sensitive areas, cultural resource areas and floodplains. The project site possesses steep hillsides and biologically sensitive land but does not contain any significant cultural resources or floodplains.

Steep hillsides are identified on the Hillside Review (HR) Overlay Zone as lands over 25% slope with a minimum difference in elevation of 50-feet. The HR Overlay Zone includes the drainage area in the northwestern portion of the project site and steep slopes in the eastern portion (Figure IV-3). RPO allows encroachment into sensitive slopes based on the percentage of the property which contains sensitive slopes. As less than 29% of the project is covered by sensitive slopes, no encroachment is allowed under RPO.

Approximately 17 acres (19 percent) of the subject property is covered by biologically sensitive lands (refer to Figure IV-3). Biologically sensitive lands are those considered to support rare, endangered or otherwise sensitive plant and animal species or communities. As less than 29% of the project is covered by biologically sensitive lands, no encroachment is allowed under RPO.

The HR Overlay Zone does not identify specific encroachment allowances. However, additional findings for development must be made, including that the site is physically suitable for the design and siting of the proposed development and development should result in minimal disturbance of sensitive areas; the grading and excavation will not result in soil erosion, silting of lower slopes, slide damage, severe scarring or other geologic

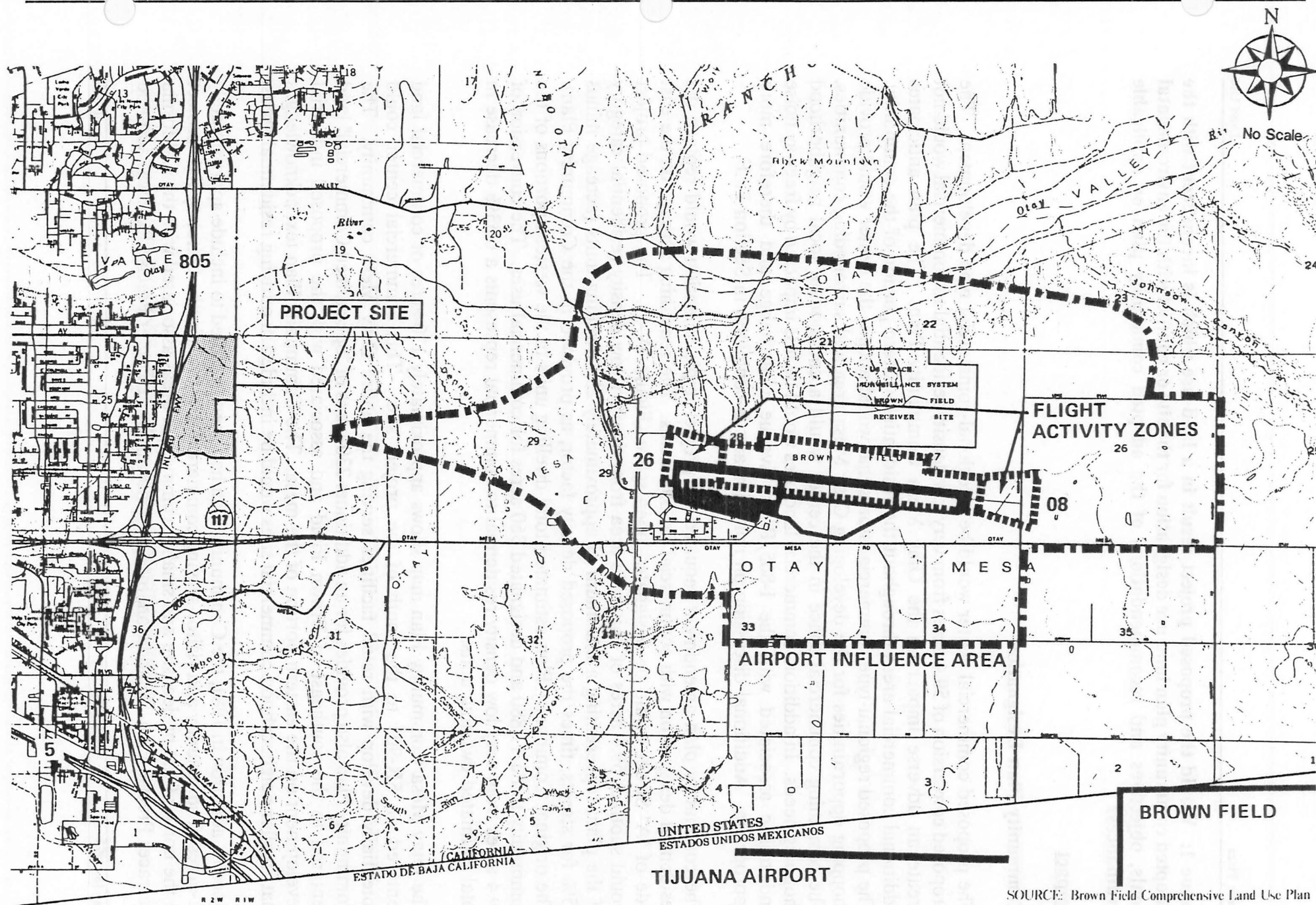
instabilities; and the proposed development retains the visual quality of the site through proper structural scale and character and varied architectural treatments.

Guidelines and criteria for development on hillsides are found in the HR Overlay Zone and include the following:

- Design structures to fit the hillside rather than altering the hillside to fit the structure.
- Site development on the least sensitive portion of the site to preserve the natural landforms, geological features and vegetation.
- Limit amount of impervious surfaces and design to support the natural drainage system.
- Replant with self-sufficient trees, shrubs and groundcover compatible with surrounding vegetation.
- Assure soil stability both during and after construction by recognizing soil characteristics, hydrology and steepness of terrain.
- Cut and fill grading shall avoid straight and unnatural slope faces.
- Use a variation in architectural design.
- Consider existing vegetation when landscaping the site.
- Match scale and character of buildings with scale and character of terrain and surrounding neighborhood.

Comprehensive Land Use Plan - Brown Field

Brown Field is located approximately 2.5 miles to the southeast of the project site. Aircraft activity creates noise levels and the potential for aircraft accidents in portions of the Otay Mesa Community planning area. The Comprehensive Land Use Plan (CLUP) prepared for Brown Field identifies areas where land uses may be impacted. The subject site falls well outside the current noise contours, airport influence area and flight activity zone (Figure IV-4). Ongoing studies for an alternative international airport in San Diego have included proposals for expanding Brown Field. Under these proposals, the subject site would remain outside the airport influence area and flight activity zone but may be influenced by noise levels of 65 CNEL. The CLUP states that commercial land uses are compatible with the 65 CNEL.



Issue 1: Would the proposed project result in a land use which is inconsistent with the adopted community plan land use designation for the site or conflict with the environmental goals, objectives and recommendations of the adopted community plan or applicable ordinances?

Impact

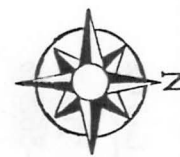
Community Plan Designation

The proposed commercial center would be a regional-commercial type development. The proposed conversion of 59.4-acres from very low density residential to commercial would not create an adverse impact on the Otay Mesa Community Plan. The plan anticipates additional commercial areas throughout the residential western portion of the community. The proposed regional-type commercial stores that would anchor the center would provide shopping opportunities for the developing Otay Mesa area and surrounding communities. The remaining commercial space in the center would accommodate local neighborhood shopping needs. In addition, commercial land uses would be less impacted by freeway noise and traffic associated with the I-805/Palm Avenue interchange and therefore more appropriate. Additional discussion on noise impacts is contained in Section IV.F.

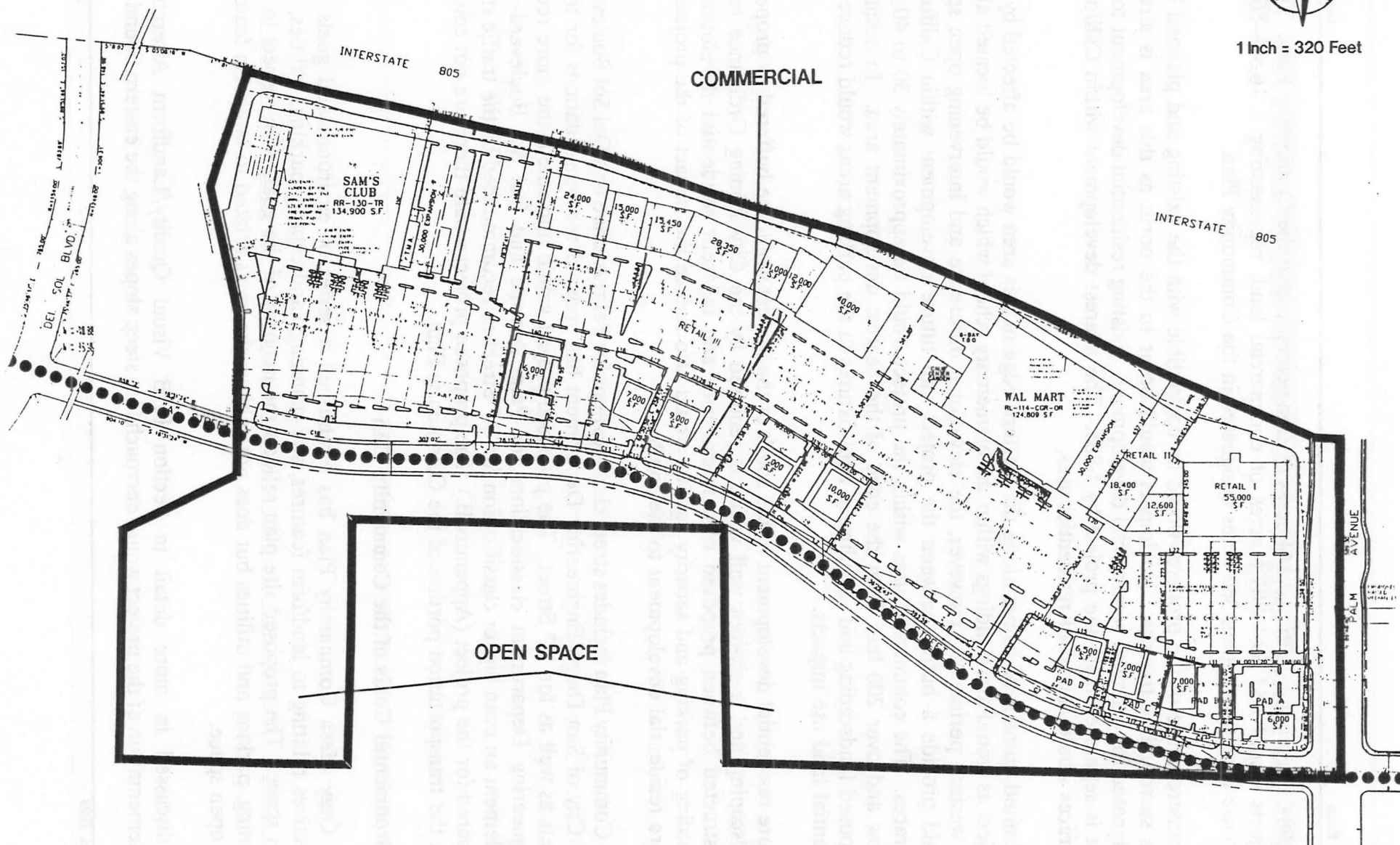
The community plan amendment required for project implementation would replace the residential designation with commercial for 59.4 acres. The remaining acreage on the east side of "A" Street would be designated open space (Figure IV-5). The proposed project would subtract 59.4 acres of buildable area from the very low density residential category of the plan, representing a maximum of approximately 252 dwelling units (acreage minus 15% for streets, times the proposed density factor, as provided in the Community Plan). The original Community Plan estimated total dwelling units in the western portions of the community to be 17,880 and designated 360 acres for commercial uses. The conversion of 59.4 acres from very low density residential to commercial represents a 0.33% decrease in total estimated dwelling units.

The Otay Mesa Community Plan map shows approximately 130-acres of commercial land centered on SR-905 to the south of the project site. This commercial center could potentially develop with retail facilities serving the entire Otay Mesa community. The Community Plan also provides for an additional 230-acres of "Specialized Commercial" land centered to the southeast of Brown Field and associated with the proposed industrial development on the eastern portion of the mesa. The Community Plan text acknowledges that smaller neighborhood commercial sites would be included in outlying residential areas.

Since its adoption in 1981, the Community Plan has been modified to include approximately 31-acres of community and visitor-serving commercial land uses in the Gateway Fair project to the north of the project site and smaller commercial areas associated with the California Terraces Precise Plan. In addition, the Otay International Center Precise Plan was adopted



1 Inch = 320 Feet



SOURCE: DUNAWAY ASSOCIATES WEST INC.

in 1984, adding an additional 144 acres of commercial use to the Community Plan. These projects would add 59.4–203.4 acres of commercial land, representing a 16.5%–56.5% increase over the original 360 acres designated in the Community Plan.

Commercial use of the property would be compatible with the existing and planned land uses surrounding the site. No impact would occur to the north as this area is already designated for a similar commercial development. Existing residential development to the west is separated from the project by I-805. The nearest development within California Terraces would consist of residential uses.

A limited number of homes along the western edge of this area would be affected by the project as would any buildings within the elementary school which would be located along the western perimeter. However, the elevational difference and intervening open space would provide a buffer between the project and future development within California Terraces. The commercial uses within the project would lie approximately 30 to 40 feet below and over 200 feet from the edge of the nearest development area. In addition, proposed landscaping and shielding of light fixtures in the parking areas would reduce the potential land use impacts.

Future residential development to the south of the project would be buffered by proposed landscaping and a six-foot wall which is required by the City Zoning Ordinance to be constructed between proposed commercial uses and adjacent residential development. Shielding of parking and security lighting would also reduce the impact of the project on future residential development to the south.

The Community Plan includes street classifications for Palm Avenue and Del Sol Boulevard. The City of San Diego Engineering Department has updated recommendations for these streets as well as for "A" Street. The proposed project would implement the more recent Engineering Department classifications for Palm Avenue and Del Sol Boulevard and implement an even higher classification for "A" Street as recommended by the traffic study prepared for the project (Appendix B.) The proposed project would therefore not conflict with the transportation portion of the Community Plan.

Environmental Goals of the Community Plan

The Otay Mesa Community Plan has established a series of environmental goals and objectives relating to landform features, site planning, landscaping, parking, utilities, and open space. The proposed site plan reflects the majority of the goals with respect to site planning, parking and utilities but does not achieve the goals related to landform features and open space.

As discussed in more detail in Section IV.B Visual Quality/Landform Alteration, implementation of the project would encroach into steep slopes along the eastern boundary

f the site and create large manufactured slopes which would reach a maximum height of 85 feet. In addition, the minimum curve radius standards for this road leave little opportunity to incorporate the contour grading recommendations of the Community Plan. Thus, the grading reflects a more traditional approach. Although the native vegetation covering these slopes have been substantially disturbed, they are considered to be significant landform features and the amount of grading proposed on these slopes would, therefore, conflict with the Environmental Goals of the Community Plan relative to landforms.

As required by the Community Plan, the commercial buildings would employ compatible storefront facades while avoiding repetitive linear placement of buildings by placing freestanding satellite buildings closer to "A" Street and breaking up the commercial spaces associated with the anchor stores on the remainder of the lot. Screening trees would visually buffer the commercial land use from vantage points to the west. Utilities would be provided with development as required by the Community Plan.

The project proposes to restore the native vegetation to the manufactured slopes which would meet the goals of the Community Plan relative to the use of drought-tolerant, natural vegetation on created slopes. In addition, the project would dedicate the revegetated slopes on the east side of "A" Street as well as the undisturbed areas along the eastern portion of the property as open space. This open space would connect with open space areas of adjacent development.

Resource Protection Ordinance

Based on the percentage of the property exhibiting sensitive slopes or biologically sensitive lands, no encroachment into either one of these resources would be allowed under RPO. Thus, the project would exceed the encroachment allowance of RPO into steep slopes and biologically sensitive land. The primary reason for the excessive encroachment is the grading necessary to construct "A" Street. Minimum curve radius standards established by the City and the applicant's goal of maintaining a contiguous commercial development, limit the ability of the project to move the road grading further out of the sensitive lands. Additional discussion of these constraints is contained in the discussion of a modified alignment for "A" Street in Section IX. Alternatives To The Proposed Action.

As shown in Figure IV-3 and Table IV-1, the project would encroach into 2.0 acres (2%) of the sensitive slopes. The project would encroach into 7.8 acres (4%) of the biologically sensitive lands (Table IV-2).

TABLE IV-1
Sensitive Slopes

Total Area ¹ (acres)	Area Impacted (acres)	Encroachment Allowance (acres)	Excess Encroachment (acres)
11.1	2.0	0	2.0

1 No sensitive slopes would be impacted by offsite portion of "A" Street and Del Sol Boulevard.

Significance of Impact

Implementation of the proposed project would have significant land use impacts related to conflicts with the environmental goals of the Otay Mesa Community Plan and the City's Resource Protection Ordinance. No significant impacts would occur with respect to the loss of residential land, compatibility with existing and planned land uses or operation of Brown Field.

The grading necessary to construct "A" Street would result in significant alteration of the steep slopes along the eastern portion of the property by creating a cut slope which would extend for a distance of approximately 4,000 feet and reach a maximum height of 85 feet. Design considerations preclude fully achieving the contour grading goals of the community plan.

Under RPO, the project exceeds the allowed encroachment into both sensitive slopes and biologically sensitive lands.

Mitigation, Monitoring and Reporting

No project mitigation measures are available to reduce the land use impact related to the environmental goals of the community plan to below a level of significance. Only implementation of the No Project or Offsite alternative would avoid a significant impact on the environmental goals as discussed in Section IX. Alternatives To The Proposed Action.

The applicant is proposing a mitigation program to reduce the project's impact relative to RPO; however, the amount of mitigation proposed is not adequate to fully mitigate RPO impacts. No mitigation measures are identified in RPO to compensate for encroachment into sensitive slopes. Similarly, no mitigation is provided in RPO for the wetland impacts, as no development of this habitat is permitted by RPO.

Full mitigation of the impacts to other biologically sensitive resources, Diegan Coastal Sage Scrub, Maritime Succulent Scrub and California gnatcatcher (as identified in Table IV-2) would be achieved by the applicant's proposal to preserve Diegan coastal sage scrub habitat (Refer to Biology Analysis and Mitigation Measures IV.D.1). This area would also provide habitat for the coastal California gnatcatcher.

Issue 2: Would the proposed project result in land uses which are not compatible with aircraft accident potential as defined by a SANDAG Airport Comprehensive Land Use Plan (CLUP)?

Impact

The project site is located outside the airport influence area (area of restricted building heights and land uses) and flight activity zone (area of risk from aircraft take-off and landings) identified for Brown Field through the Comprehensive Land Use Plan (CLUP) adopted by SANDAG. Although commercial land uses are less impacted by noise and may locate in areas up to 75 decibels CNEL (Community Noise Equivalent Level), the project site lies outside the 60 CNEL noise contour line as shown on the Brown Field CLUP.

Significance of Impact

The project would not result in any significant impacts relative to Brown Field operations.

Mitigation, Monitoring and Reporting

No mitigation is required.

**TABLE IV-2
Biologically Sensitive Lands**

Resource Category	Total Area (acres)	Area Impacted (acres)	Encroachment Allowance ¹ (acres)	Mitigation Ratio	Habitat Value Factor	Compensation Required (acres)
Mulefat Scrub	0.6 ²	0.6 ²	0	3:1	1.0	1.8
Seasonal Isolated Wetland	0.01	0.01	0	3:1	0.2	0.006
Maritime Succulent Scrub	7.0	1.3	0	2:1	1.0	2.6
	1.1	0.2	0	1:1	0.6	0.12
Subtotal Maritime Succulent Scrub	8.1	1.5	0	NA	NA	2.72
Diegan Coastal Sage Scrub	4.0	0.1	0	1:1	1.0	0.1
	1.1	1.1	0	1:1	0.4	0.4
	1.0	1.0	0	1:1	0.6	0.6
	0.8	0.8	0	1:1	0.2	0.2
	0.4 ³	0.4 ³	0	1.5:1 ³	0.6 ³	0.9 ³
	0.5	0.5	0	2:1	1.0	1.0
Subtotal Diegan Coastal Sage Scrub	7.8	3.9	0	NA	NA	3.1
Non-Native Grassland ⁴	0.4	0.4	0	2:1	1.0	0.8
	1.3	1.3	0	2:1	1.0	2.6
Subtotal Non-Native Grassland	1.7	1.7	0	NA	NA	3.4
Biologically Sensitive Lands Total	18.2	7.8	0	NA	NA	11.1

- 1 No encroachment is allowed under RPO as neither steep slopes or biologically sensitive lands comprise more than 29% of the total project area.
- 2 Includes 0.2 acres impacted by offsite portion of "A" Street.
- 3 Impacted by offsite portion of "A" Street.
- 4 Sensitive due to occurrence of sensitive species.

B. VISUAL QUALITY/LANDFORM ALTERATION

Existing Conditions

Site Characteristics

As discussed in Section II. Environmental Setting and illustrated in Figure II-3, the project site has been disturbed by offroad vehicle activity, excavation of fill material for an offsite construction project and past landfill activities. As a result of this disturbance, the property is not considered to represent a significant visual resource in the area.

An extensive series of offroad trails have severely impacted the slopes on the east side of the project and have proportionately degraded the native vegetation covering the slopes. These slopes are part of the westerly slope of the Otay Mesa which is located to the east. While the landform has not been substantially altered, the visual quality of the slopes has been greatly diminished. Offroad vehicles have also degraded the visual character of the ravine located in the northern portion of the site.

The previous landfill operation in the northern portion of the property and the subsequent excavation of a major portion of the landfill deposits has significantly altered the landform and visual character of the northern portion of the property. The northern portion of the site was used as a County landfill in the 1950's. Much of this landfill material was removed from the site between 1978 to 1979, leaving this portion in its present, graded state. Two cut slopes approximately 25-30 feet high and 100 feet long was created along the eastern slopes in the course of the excavation. The landfill operation has also degraded the ravine which located in the northern portion of the property.

As discussed in Section II. Environmental Setting, the topographic character of the project site is dominated on the east by slopes which rise up to the mesa which lies further east. The change in elevation across the site from west to east ranges between 80 to 100 feet. The slopes undulate in a north/south direction and are defined in several locations by ravines.

The western portion of the project is more level; particularly, over the northern portion of the site which was excavated as part of an earlier borrow operation. A small ravine crosses through the northern half of the property in an east/west direction and has an average depth of between 30 and 50 feet. This landform of this ravine has been altered by the past landfill activities as well as the installation of a storm drain along the centerline of the ravine.

Site Visibility

The visibility of the property from much of the surrounding areas is limited by topography. In addition, land to the north, east and south is undeveloped and presently supports no land uses which include the site in their viewshed. The most notable existing public vantage points from which the project site is visible include I-805, Palm Avenue (west of I-805) and Palm Ridge Park (west of I-805 and south of Palm Avenue).

With respect to I-805, the site is visible to southbound traffic on I-805 from approximately the Otay Valley Road interchange ($\pm 3/4$ mile north of the site) to just north of the project site. At the Palm Avenue overcrossing, the grade of I-805 is lower than the project site (Figure IV-6). At Palm Avenue, I-805 is approximately 75 feet lower than at the westerly property line of the site. This grade differential diminishes to approximately 25 feet lower at the property line at the southern boundary of the project. Thus, motorists on I-805 are generally unable to view much of the site when travelling along the project. Travellers westbound on I-905 transitioning onto northbound I-805 can see the southern portion of the site but would be over 2,400 feet from the southern property line.

The project site would be visible from Palm Ridge Park. This park is located at the approximately 25 to 40 feet below the project site and essentially the entire site can be viewed from this park as illustrated in Figure IV-7. The visibility of the site from Palm Avenue, west of I-805, would be similar to that from Palm Ridge Park.

Issue 1: Would the proposed project result in the obstruction of any vista or scenic view from a public viewing area?

Impact

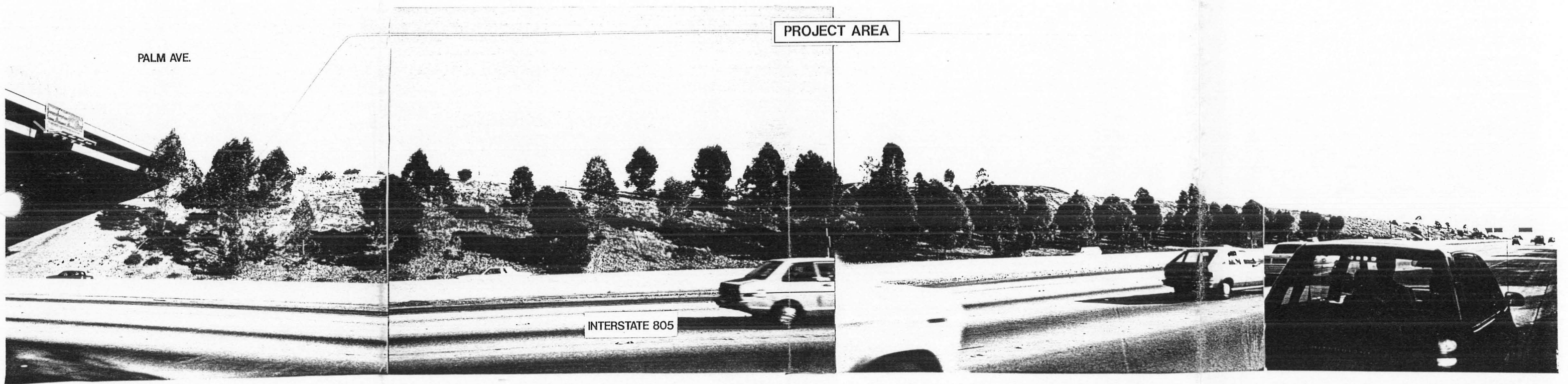
The project would not result in any significant obstruction of vistas or scenic views from surrounding public viewing areas. As discussed above, the project site is not considered a significant visual resource due to the extensive grading and disturbance which has occurred on the property in the past.

Significance of Impact

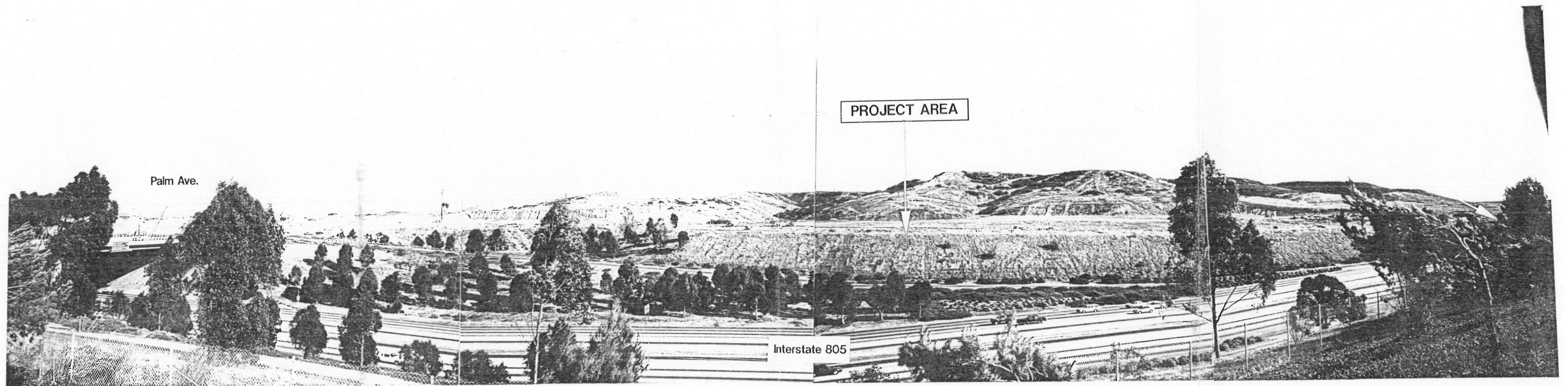
The proposed project would not significantly obstruct a scenic views from surrounding public vantage points.

Mitigation, Monitoring and Reporting

No mitigation is required.



61-11 View from I-805 (Palm Avenue Interchange) Looking Southeast Across Property _____ Figure IV-6



Palm Ridge Park Boundary

Issue 2: Would the proposed project result in the creation of a negative aesthetic site or project, substantial alteration to the existing character of the area, or project bulk, scale, materials or style which would be incompatible with surrounding development?

Impact

Implementation of the proposed project would transform the property from its existing vacant condition into a commercial retail center. The impact of this change is dependent on several factors including the visibility of the development from surrounding land, the sensitivity of surrounding areas to the visual character of the site and the current conditions within the project boundaries. As discussed earlier, the project site does not exhibit any significant intrinsic visual qualities due to the past disturbance which has taken place. Thus, this discussion focuses on potential aesthetic impacts of the proposed development and grading rather than the conversion of the site from a vacant to a developed condition.

The primary aspects of the project which would affect the visual quality of the area are related to the proposed grading, and building size and placement. The major elements of each of these aspects is summarized below; a more complete description is contained in Section III. Project Description.

Grading

A substantial grading operation would be necessary to make the site suitable for commercial development. Up to 44 feet of fill would be placed in the ravine in the northern portion of the site to accommodate development. Construction of "A" Street would require excavation into the slopes on the eastern portion of the property. Grading for this road would create a manufactured slope which would extend for the entire length of the road (approximately 3,000 feet) and reach a maximum height of 81 feet. Construction of the offsite portion of "A" Street would result in approximately 1,000 linear feet of manufactured slope reaching a maximum height of 85 feet. Manufactured slopes associated with construction of the offsite portion of Del Sol Boulevard would create another 850 linear feet of manufactured slope with a maximum height of 35 feet; these slopes would likely be removed as the area south of the project is developed.

The filling of the ravine would not adversely impact the visual character of the area but the manufactured slope along "A" Street would have a substantial visual impact. These slopes would be visible from existing residential areas to the west as well as from portions of I-805 to the north and south; views of these slopes from I-805 along the project would be generally precluded by intervening topography, landscaping and commercial buildings.

Commercial Development

Overall, the 59.4-acre development area would be occupied by commercial building complexes surrounded by parking areas. The majority of the proposed commercial buildings would be located on the west side of the site adjacent to I-805. A series of nine freestanding commercial buildings would be located along "A" Street. Parking would generally be located in the central portion of the site.

Three major building complexes would occur along the western side of the project. At the north end, the proposed Wal-Mart and additional retail uses, representing 210,809 square feet, would extend approximately 950 linear feet along the freeway. The second complex of retail buildings (145,800 square feet) would be separated from the Wal-Mart complex by 170 feet of parking area and extend approximately 1,000 linear feet. The third building complex would be the Sam's Club (134,900 square feet) which would extend a distance of 450 linear feet and be separated from the second building complex by 350 feet of parking area. The buildings would be 20 to 36 feet in height and would be staggered within each building complex to reduce the perceived bulk and scale. These building complexes would be oriented toward the central parking area which would mean that the loading areas and rear elevations would be oriented toward I-805.

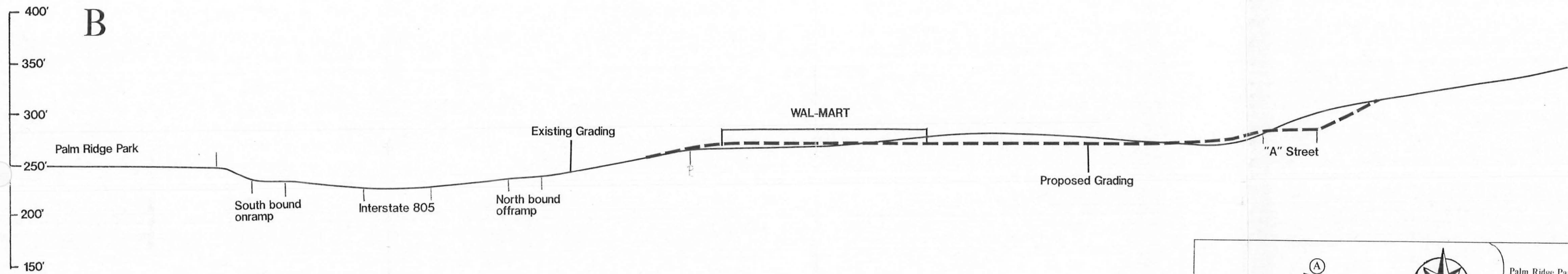
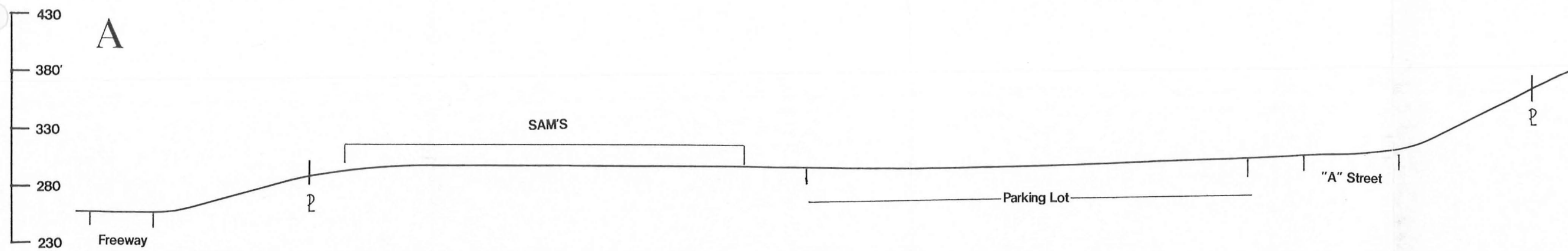
The eastern side of the commercial center would include nine freestanding buildings helping to break up the monotony of a solid wall of commercial buildings ranging in size between 6,000 square feet and 10,000 square feet. The buildings would be separated by parking areas and driveways.

Visual Impact on Surrounding Uses

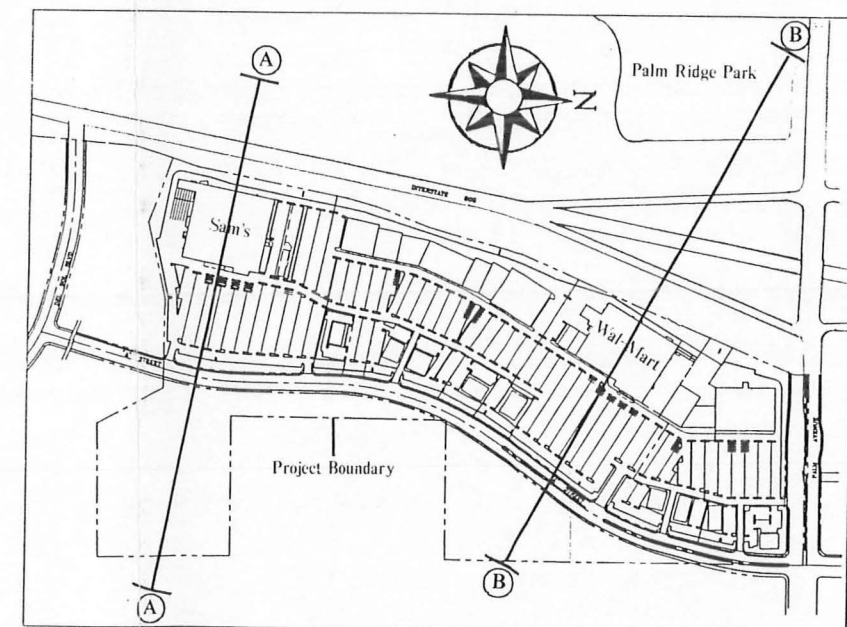
Existing residences and the local park, to the west, are located below the elevation of the project but would be able to see the majority of the proposed development. A before and after cross section which is considered representative of the relationship of the proposed project to development to the west is contained in Figure IV-8.

Implementation of the project would change the character of the site from undeveloped land to a commercial center. These homes would be located a minimum of 250 feet away and would be separated from the project by I-805. This combined with the proposed landscaping along the westerly property line, would reduce the potential impacts to below a level of significance.

Motorists on I-805 would not be significantly impacted by the project. As seen in Figure IV-8, I-805 is between 35 and 75 feet lower than the project site. Thus, motorists currently do not see a large portion of the site and, specifically, do not see much of the eastern slopes. After development of the site, motorists would be able to see the western side of the retail buildings (Figure IV-8) but the proposed landscaping and spatial relationship to the



Scale: 1" = 100'



buildings would avoid significant visual impacts to I-805 motorists as they pass the site.

Future residences and an elementary school to the east would be approximately 50 feet higher than the ground elevation of the commercial development and thus, would look out over the building roofs and parking areas and not have any long range views blocked. The number of residents which may be affected is unknown as no specific development plans exist. However, the number would be limited to those residents occupying homes on the immediate perimeter of future development as these homes would block views of the project from units further east. While not considered a desirable view, the impact of the project on these residents is not considered significant due to the low number of homes expected to be affected.

Future residences to the south would likely be at a similar elevation to the project. With proposed landscaping and construction of a six-foot screen wall, residents to the south would not experience a significant visual impact from the project. Furthermore, the bulk and scale of the project as seen from this location would be less than from the western or eastern side since the development would run in a linear north-south fashion.

Significance of Impact

Visual impacts associated with slope grading would be significant. The 4,000 linear feet of manufactured slope with a maximum height of 85 feet along the east side of "A" Street would result in a significant impact.

The proposed commercial development would detract from the visual quality of the area but not to a level which is considered significant. Surrounding residential areas would be sufficiently buffered by topographic features, spatial distance and/or landscape treatment to avoid significant visual impacts.

Mitigation, Monitoring and Reporting

The visual impact of the proposed grading and development of the site would be mitigated by the architectural, landscaping and other design features included in the site plan as discussed earlier. Implementation of these features would reduce the visual impacts to below a level of significance. Mitigation of the visual impacts would be assured through the implementation of the following mitigation measure:

Mitigation Measure IV.B.1: ~~Prior to issuance of a building permit for the first building within the project, final landscape plans shall be reviewed and approved by the City Planning Director. These plans shall be in general conformance with the conceptual landscape plan illustrated in Figure III-5 of the EIR. Prior to issuance of a land development permit, final landscape plans shall be reviewed and approved by the Planning Department to confirm that naturalized plant material will be used. Prior to issuance of a Notice of Completion and~~

Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that landscaping has been implemented pursuant to the approved plans.

Issue 3: Would the proposed project result in substantial change in topography or ground surface relief features, or the loss, covering, or modification of any unique geologic or physical feature?

Impact

The project site presently exhibits natural topography with the exception of the northern portion which has been substantially altered due to its past use as a landfill and borrow site. As concluded in Section IV.A Land Use, the grading proposed by the project would significantly impact the slopes located along the east side of the property. These slopes are considered to be locally significant landform features although their appearance has been substantially diminished by offroad vehicle activities which has removed much of the native vegetation. The filling of the ravine would not be significant due to the past disturbance of the ravine and its relative isolation.

As stated earlier, construction of "A" Street necessitates the creation of a manufactured slope which would have an overall length of approximately 4,000 feet and a maximum height of 85 feet. Curve radius standards set by the City of San Diego for Major streets as well as the need to maximize development area makes it difficult to design the road to avoid substantial encroachment into the eastern slopes. A more detailed discussion of these limitations is contained in Section IX. Alternatives which includes a discussion of a modified alignment for "A" Street.

Significance of Impact

The alteration of the eastern slopes and the creation of a manufactured bank reaching a maximum height of 85 feet and a horizontal length of approximately 4,000 feet would have a significant landform impact.

Mitigation, Monitoring and Reporting

The proposed landscaping would reduce the visual impact of this grading, however, it would not fully mitigate the landform impact. Full mitigation of the landform impact would only be possible with the adoption of the No Project, Offsite or Modified Roadway alternatives as discussed in Section IX.

C. TRAFFIC

The traffic impact analysis for roadway segments and intersections (Issue 1) is based upon information taken from the traffic study prepared for the project by Kimley-Horn and Associates in May, 1993 (Appendix B).

Traffic conditions were analyzed for the following scenarios:

- Existing
- Existing Plus Project
- Build-out without Project
- Build-out with Project
- Interim Conditions with Project

The Engineering and Development Department considers level of service (LOS) D to be an acceptable operational level in urban areas. Consequently, the traffic study prepared for this report utilized LOS D as an acceptable level. However, a LOS below C is considered to be a significant environmental impact due to substantial delays which result in, and contribute to, the degradation of the local and regional air quality. Air quality impacts are discussed in Section IV.E Air Quality.

Existing Conditions

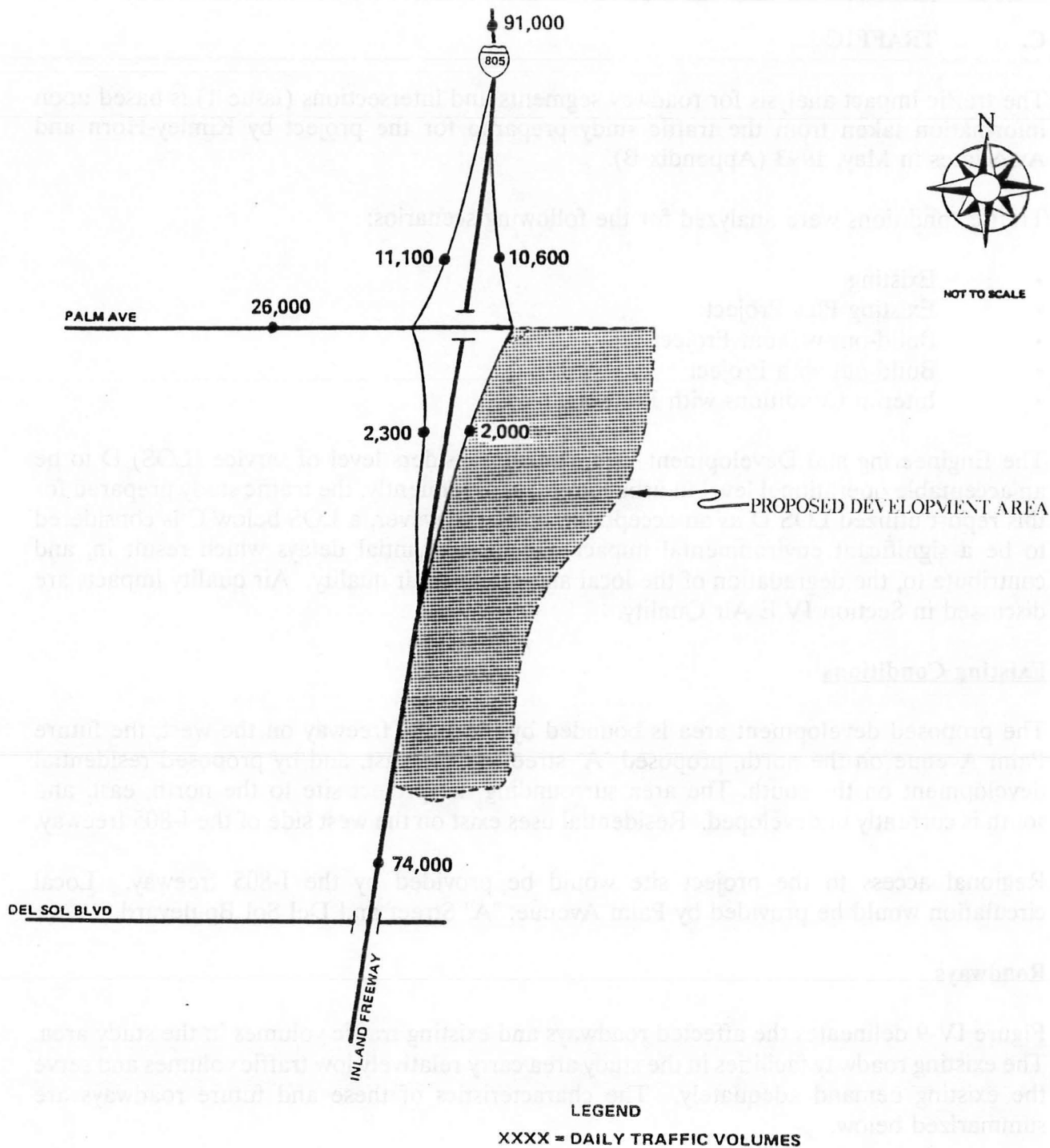
The proposed development area is bounded by the I-805 freeway on the west, the future Palm Avenue on the north, proposed "A" street on the east, and by proposed residential development on the south. The area surrounding the project site to the north, east, and south is currently undeveloped. Residential uses exist on the west side of the I-805 freeway.

Regional access to the project site would be provided by the I-805 freeway. Local circulation would be provided by Palm Avenue, "A" Street and Del Sol Boulevard.

Roadways

Figure IV-9 delineates the affected roadways and existing traffic volumes in the study area. The existing roadway facilities in the study area carry relatively low traffic volumes and serve the existing demand adequately. The characteristics of these and future roadways are summarized below.

Interstate 805 is an eight-lane freeway which extends north from the I-5 freeway north of the Mexican border through the study area to connect with I-5 in central San Diego County. There is currently an interchange at Palm Avenue.



Source: Kimley-Horn and Associates, Inc.

Palm Avenue is a four-lane Major roadway running westerly from the interchange at I-805 to Imperial Beach and SR-75 (the Silver Strand). Palm Avenue currently terminates on the eastern end of the I-805 interchange. The ramps at this intersection are stop-sign controlled. In accordance with the recommended travel forecasts provided by the City of San Diego, Palm Avenue would be constructed east of I-805 as a six-lane primary arterial as far as the future "A" Street, with an extra lane in the westbound direction for a total of seven lanes. East of future "A" Street, Palm Avenue will be constructed as a four-lane Major roadway.

Del Sol Boulevard is currently a four-lane Collector roadway from Beyer Boulevard to the I-805 freeway. An undercrossing at the freeway is already constructed, but Del Sol Boulevard ends just east of the crossing. The project would construct a segment of Del Sol Boulevard from its present eastern terminal to the proposed "A" Street. Del Sol Boulevard is recommended as a four-lane Collector east of its present terminus at I-805. To the east of "A" Street, Del Sol Boulevard is recommended as a two-lane Collector as far east as Palm Avenue.

"A" Street would be constructed by the project from Palm Avenue to Del Sol Boulevard. Based on City of San Diego travel forecasts for the Community Plan, a four-lane Major roadway is required north of Palm Avenue. South of Palm Avenue along the eastern length of the project site, "A" street is classified as a four-lane Collector. Approximately midway between Palm Avenue and Del Sol Boulevard, it would transition to a two-lane Collector until it intersects with Del Sol Boulevard. As described in the subsequent impact analysis, the project would upgrade the foregoing "A" Street classifications south of Palm Avenue.

Transit

There is no transit service currently in operation within the immediate study area. The only existing rail transit service near the project site is the San Diego Trolley which operates along the I-5 corridor, between the International Border Crossing at San Ysidro and downtown San Diego. There are also a few local bus routes which currently come within a mile or two of the site. Once the Otay Mesa Community Area begins to develop, existing bus routes could be extended to serve the project.

Issue 1: Would the project result in traffic generation in excess of specific/community plan allocation or increase projected traffic which is substantial in relation to the capacity of the road system? Would the proposed project result in a substantial impact upon the existing or planned transportation system?

The proposed project would improve roadway segments providing local access to the project site. The segment of Palm Avenue having frontage on the project's northern boundary would be constructed as a six-lane primary arterial, with an added lane in the westbound direction plus an extra deceleration lane in the eastbound direction for a total of eight lanes. "A" Street would be constructed as a four-lane Major roadway between Palm Avenue and

Del Sol Boulevard. Del Sol Boulevard would be constructed offsite as a four-lane Collector from "A" Street to Interstate 805. The foregoing roadway improvements were assumed in the following impact analysis. Additionally, as stated earlier, any LOS below C is considered to represent a significant impact.

Impact

Trip generation rates utilized for the project are contained in Appendix B and correspond to the Community Commercial category as described in the City of San Diego guidelines. The resulting trip generation characteristics of the project are shown on Table IV-3. The project is estimated to generate approximately 43,200 driveway and 30,200 cumulative trips on a daily basis. The driveway trips represent the total trips generated by the project that would be entering or exiting the project driveways. The cumulative trips represent the project-generated traffic impact to the areawide roadway system. The cumulative trips are lower than the driveway trips to account for the effect of passer-by trips and the shared trip characteristics of a mixed use retail center.

Existing Plus Project Conditions

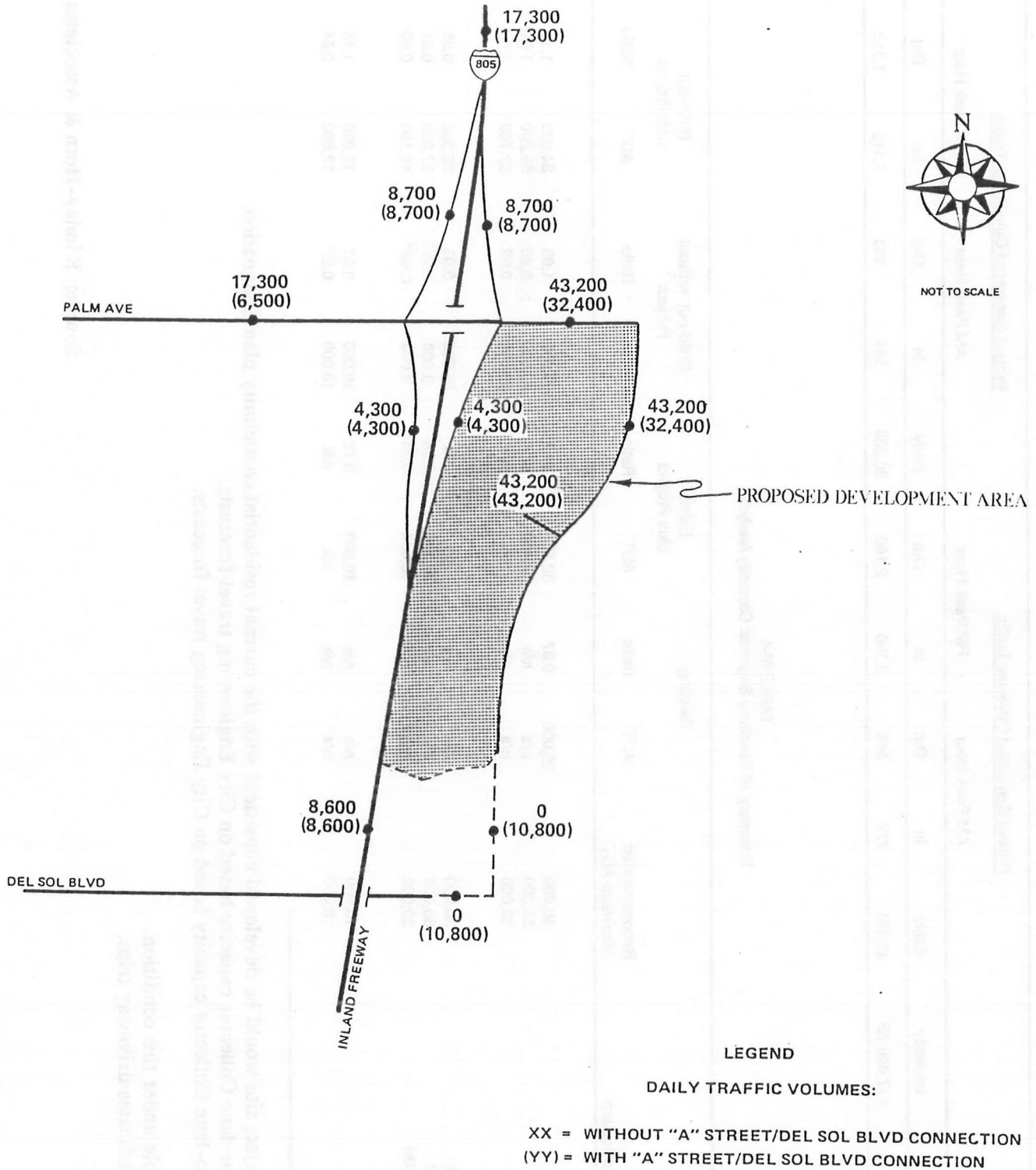
Roadway segments and intersections of the study area were analyzed under existing plus project conditions. The following analyses assumed a project traffic distribution associated with the offsite road improvements of "A" Street and Del Sol Boulevard. The construction of these offsite roadway segments would occur with project implementation.

Roadway Capacity

Figure IV-10 depicts the distribution of project traffic using driveway trips on existing study area roadways. Of the estimated 43,200 project driveway trips, approximately 25,900 would utilize the I-805 freeway and 6,500 would use Palm Avenue west of the freeway. The distribution of peak hour project traffic on the I-805 interchange ramps is depicted in Figure 10 of Appendix B.

Roadway segment operation was analyzed for the addition of project traffic to existing traffic volumes (Table IV-4). With the exception of Palm Avenue, west of I-805, driveway trips were assumed for roadway segments of the analysis. This assumption was made since passer-by trips would not occur on Palm Avenue east of I-805 or "A" Street until the area to the east of the project is developed and these roadways are being traveled for reasons other than reaching the project.

With project traffic, Palm Avenue between I-805 and "A" Street would carry traffic volumes below the recommended maximum for Prime Arterials. West of I-805, the project daily traffic would exceed the recommended maximum for a four-lane major roadway by 8%. However, since the City of San Diego generally considers those conditions where the estimated traffic does not exceed the recommended maximum by 30% to be acceptable,



NOTE: TRAFFIC VOLUMES BASED ON DRIVEWAY RATES

Source: Kimley-Horn and Associates, Inc.

TABLE IV-3
Project Trip Generation

Land Use	Intensity	Daily	<u>Project Generated Driveway Traffic</u>				<u>Project Generated Cumulative Traffic</u>				
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
			In	Out	In	Out	In	Out	In	Out	
Wal-Mart Center	617,000 SF	43,191	777	518	2,160	2,160	30,233	544	363	1,512	1,512

TABLE IV-4
Summary of Roadway Segment Capacity Analysis

Roadway Segment/Classification	Recommended Maximum ADT	Existing		Existing plus Project		Build-out without Project ¹		Build-out with Project	
		ADT	Ratio	ADT	Ratio	ADT	Ratio	ADT	Ratio
<u>Palm Avenue:</u>									
West of I-805/4M	30,000	26,000	0.87	32,500	1.08	31,000	1.03	34,000	1.13
I-805 to A Street/7P	55,000	n/a	n/a	32,400	0.59	43,000	0.86	56,200	1.02
East of A Street/4M	30,000	n/a	n/a	n/a	n/a	28,000	0.93	32,700	1.09
<u>A Street:</u>									
North of Palm Ave./4M	30,000	n/a	n/a	n/a	n/a	28,000	0.93	29,300	0.98
South of Palm Ave./4M	30,000	n/a	n/a	32,400	1.08	8,000	0.53 ²	27,300	0.91
North of Del Sol Blvd./4M	30,000	n/a	n/a	10,800	0.36	3,000	0.40 ³	18,100	0.60
<u>Del Sol Blvd.:</u>									
West of A Street/4C	15,000	n/a	n/a	10,800	0.72	10,000	0.67	17,000	1.13
East of A Street/4C	15,000	n/a	n/a	n/a	n/a	10,000	0.67	12,600	0.84

- (1) Assumes project site would be developed consistent with the current residential community plan designation.
 (2) Assumes four-lane Collector capacity based on City Engineering travel forecasts.
 (3) Assumes two-lane Collector capacity based on City Engineering travel forecasts.

n/a: Not applicable under this condition.
 Note: **Bold** ADT indicates driveway trips.

Source: Kimley-Horn & Associates

Palm Avenue west of I-805 would not be significantly impacted. It should be noted that the impact to this segment of Palm Avenue would be lessened under build-out conditions, as discussed below.

"A" Street between Palm Avenue and Del Sol Boulevard would not be significantly impacted by existing plus project traffic volumes. The segment just south of Palm Avenue would exceed recommended maximum capacity by 8%, well within the maximum excess limit of 30%. The number of trips on the segment just north of Del Sol Boulevard would be 10,800 or 36% of the recommended maximum.

Existing plus project traffic volumes would not significantly impact Del Sol Boulevard. For the proposed four-lane Collector of Del Sol Boulevard, west of "A" Street, project traffic volumes would stay well below the recommended maximum capacity of this segment.

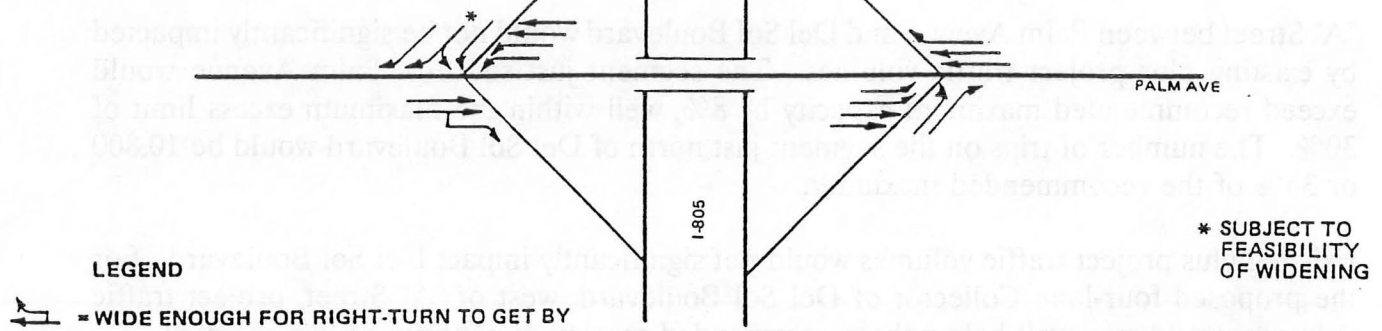
Intersection Capacity

The two ramp intersections on Palm Avenue at the I-805 interchange were analyzed using the Highway Capacity Manual (HCM) methodology for signalized intersections, since they are expected to be signalized. Lane assumptions for the existing plus project scenario are shown on the top portion of Figure IV-11. The intersection analysis revealed that the intersection of Palm Avenue and the northbound I-805 ramp terminal would operate satisfactorily at LOS B during the AM peak hour, but unsatisfactorily with LOS D during PM peak hours. The intersection of Palm Avenue and the southbound I-805 ramp terminal would operate at an acceptable LOS B during the AM peak hour and unacceptable LOS D during the PM peak hour. Under existing plus project conditions, level of service would not be applicable to the intersections at "A" Street/Palm Avenue and "A" Street/Del Sol Boulevard since there would be no conflicting movements at these intersections. The foregoing level of service conditions are portrayed in Table IV-5.

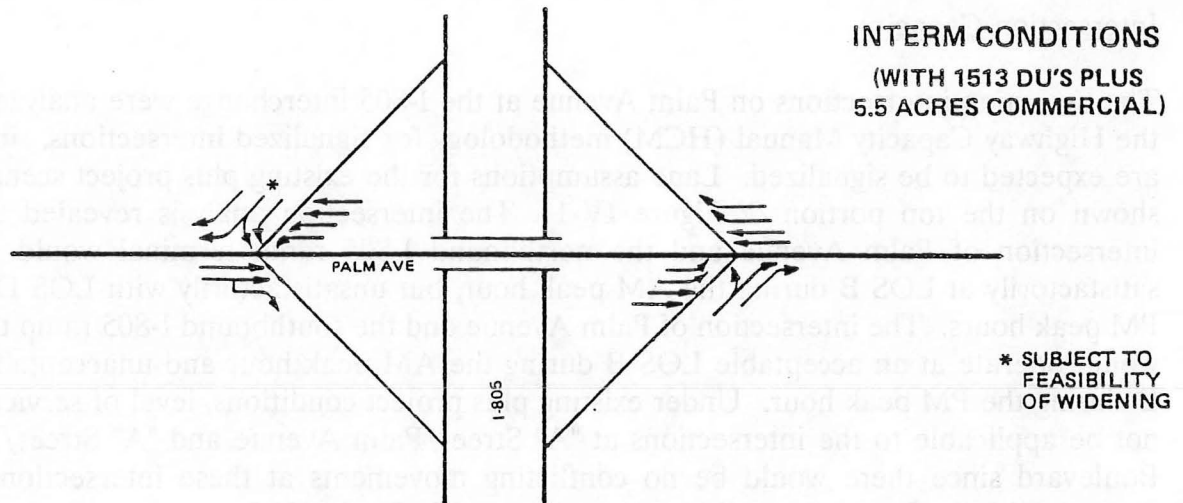
Build-out without Project

Traffic conditions were analyzed under the build-out condition without project implementation. This condition assumes that the project site would be developed with residential uses as planned for by the Otay Mesa Community Plan. The SANDAG Series Seven Southbay Traffic Model previously assumed a total of 6,200 residential trips in the traffic analysis zones corresponding to the South Palm Precise Plan, an area which includes the current project site. The resulting study area traffic volumes under the Build-out without Project condition are shown in Table IV-4. In all cases, traffic volumes are less than the recommended maximum, except for Palm Avenue, west of I-805. The estimated traffic on this segment is slightly above the recommended maximum, but well under the acceptable 30% limit of excess traffic exceeding the maximum.

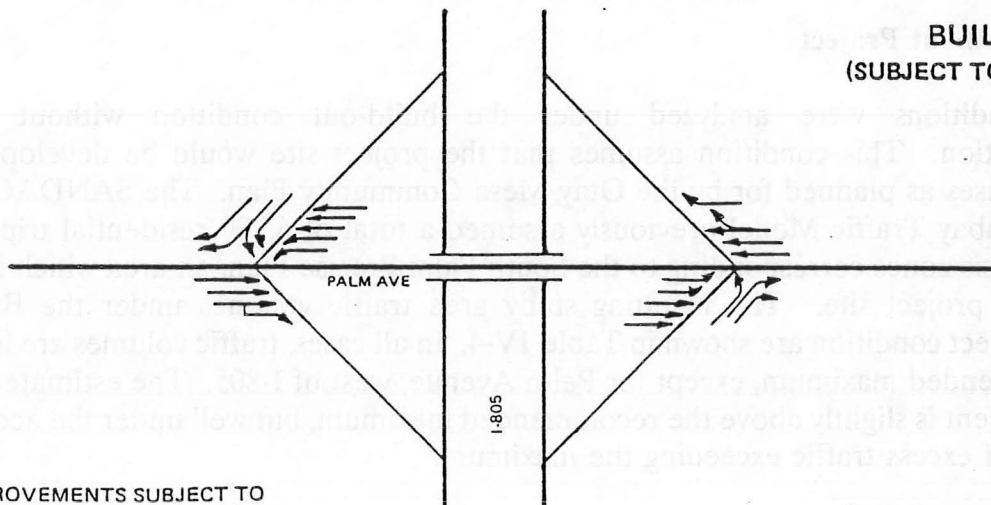
**EXISTING TRAFFIC
PLUS WAL-MART CENTER**



**INTERM CONDITIONS
(WITH 1513 DU'S PLUS
5.5 ACRES COMMERCIAL)**



**BUILDOUT
(SUBJECT TO PSR AND PR)**



NOTE: ALL IMPROVEMENTS SUBJECT TO
CALTRANS REVIEW AND APPROVAL

Source: Kimley-Horn and Associates, Inc.

TABLE IV-5
Summary of Intersection Level of Service
AM and PM Peak Hours

Intersection	Existing		Existing Plus Project		Interim Conditions with Project ¹		Build-out with Project	
	AM	PM	AM	PM	AM	PM	AM	PM
Palm Avenue at:								
I-805 SB Ramp Terminal	NS	NS	B	D	C	D	D	D
I-805 NB Ramp Terminal	NS	NS	B	D	C	C	D	D
"A" Street	NI	NI	*	*	*	*	D	E
"A" Street at:								
Del Sol Boulevard	NS	NS	*	*	*	*	B	C

NS Not Signalized

NI No Intersection exists

* No LOS computation because there would be no conflicting movements at the intersection.

(1) Interim conditions include existing traffic, project traffic, and traffic associated with 1,513 dwelling units and 5.5 acres of commercial development to the east.

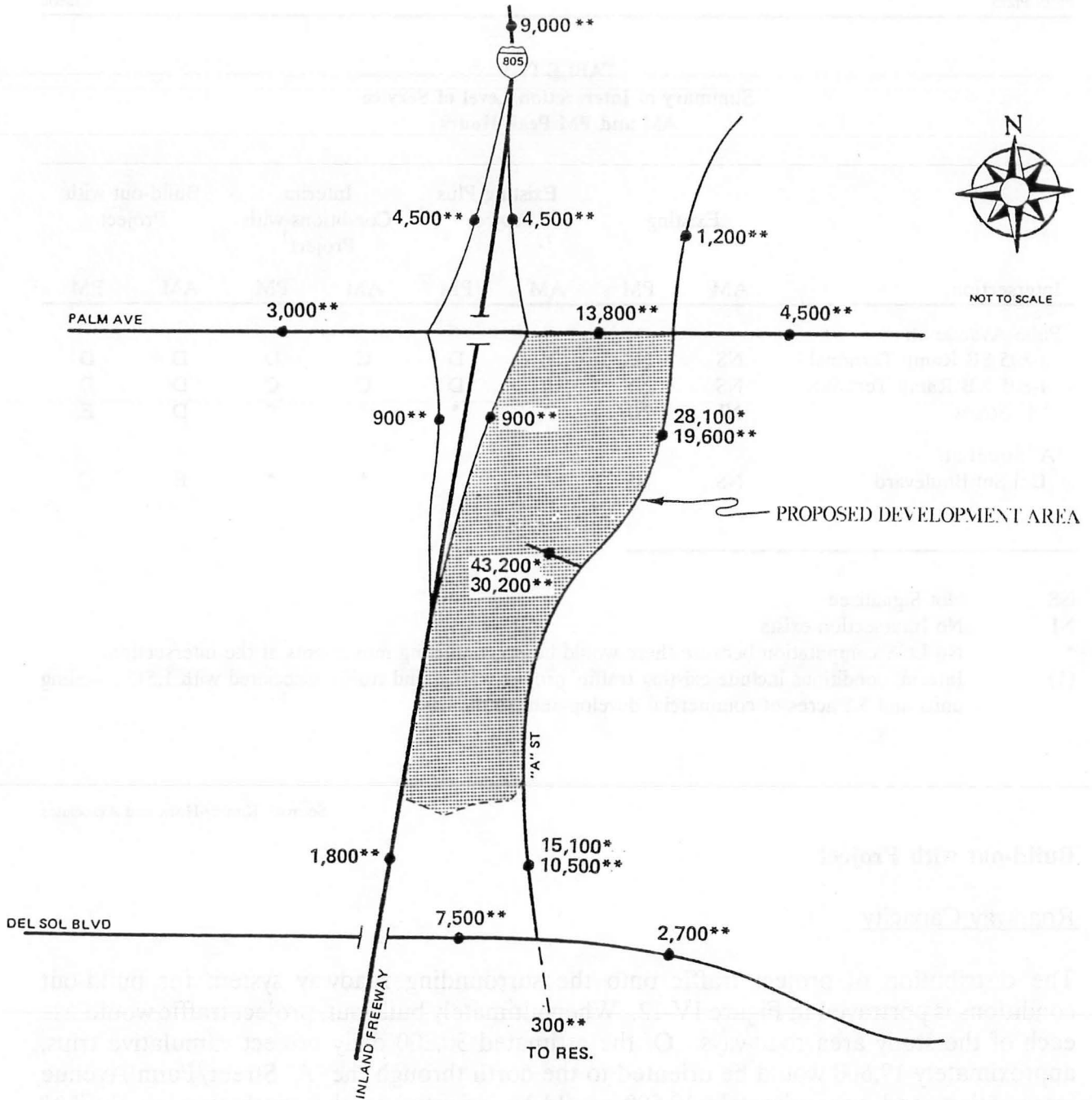
Source: Kimley-Horn and Associates

Build-out with Project

Roadway Capacity

The distribution of project traffic onto the surrounding roadway system for build-out conditions is portrayed in Figure IV-12. When ultimately built-out, project traffic would use each of the study area roadways. Of the estimated 30,200 daily project cumulative trips, approximately 19,600 would be oriented to the north through the "A" Street/Palm Avenue intersection, and approximately 10,500 would be oriented to the south through the "A" Street/Del Sol Boulevard intersection.

Under the buildout with project condition, roadway segment capacities were analyzed using cumulative trips since passer-by trips would occur on roadways. For the analysis, residential traffic volumes forecasted by the community plan for the South Palm Precise Plan were not included. However, traffic volumes from potential residential development south of the project site were included. Approximately, 4,500 residential trips would be potentially generated from this area. The resulting roadway segment analysis is shown in Table IV-4.



LEGEND

XXXX = AVERAGE DAILY TRAFFIC VOLUMES

* = USING DRIVEWAY RATES

** = USING CUMULATIVE RATES

Source: Kimley-Horn and Associates, Inc.

On Palm Avenue, no significant traffic impacts would be associated with the project under the build-out with project condition. The roadway analysis reveals that Palm Avenue throughout the study area is projected to carry traffic volumes above the recommended classification. However, for each segment analyzed, the projected traffic volumes are within 13% of the recommended maximum volumes, below the 30% acceptable limit.

The proposed "A" Street segments between Palm Avenue and Del Sol Boulevard would not be significantly impacted by buildout with project traffic volumes. The four-lane Major facility would carry a traffic volume approximately 91% of the recommended maximum capacity at the northern end and no more than 60% at the southern end.

Build-out with project traffic conditions would not significantly impact Del Sol Boulevard. Traffic volumes are projected to be below the recommended maximum capacity east of "A" Street but above the recommended maximum west of "A" Street. However, the projected traffic volume for this roadway segment is within 13% of the recommended maximum capacity, an acceptable volume which is less than the 30% excess limit.

Intersection Capacity

Using the number of lanes assumed in the Community Plan, the intersection of Palm Avenue/"A" Street would be significantly impacted by project traffic. Under the buildout with project condition, the intersection would operate at LOS D in the AM peak hour and LOS E during the PM peak hour (see Table IV-5).

The intersection of Del Sol Boulevard and "A" Street was found to satisfy signal warrant criteria based upon estimated average daily traffic for the build-out with project conditions. Level of service would be satisfactory with LOS B during the AM peak hour but unacceptable with LOS D during the PM peak hour.

The ramp terminals at the interchange of I-805 and Palm Avenue were analyzed for build-out with project conditions. The lane assumptions are illustrated in the bottom portion of Figure IV-11. With ultimate lane assumptions, the ramp terminals would operate at an LOS D both in the morning peak hour and the afternoon peak hour which is considered an unacceptable level of service.

Interim Conditions with Project

An interim conditions with project scenario was analyzed for conditions prior to build-out to determine whether sufficient capacity would be available at the I-805 ramp terminals. This scenario assumes the addition of project traffic to traffic volumes for 1,513 residential units and 5.5 acres of commercial space proposed east of the project site. For this scenario, the number of lanes illustrated in the middle portion of Figure IV-11 was assumed. In the afternoon peak hour, the southbound ramp terminal would operate at LOS D. The

southbound ramp terminal during the morning peak hour and the northbound ramp terminal during AM and PM peak hours would operate at LOS C.

Site Access

As shown on Figure IV-13, the proposed site plan for the project includes seven driveways. The lane configurations of each proposed driveway are included in Appendix B. Six of the driveways would be along the western side of "A" Street between Palm Avenue and the southern boundary of the site. An additional driveway is proposed at the north edge of the site, taking access from the south side of Palm Avenue, just west of "A" Street.

The distribution of project traffic among the proposed driveways was developed for three different scenarios. Two of the scenarios reflect the existing plus project conditions with and without the Del Sol Boulevard/"A" Street connection. The third scenario reflects build-out conditions.

Signal warrant analysis indicated that the intersection of "A" Street at proposed primary project driveway (Driveway D) would need to be signalized. The intersection analysis revealed that the "A" Street/Driveway D intersection, with a signal, is projected to operate at an adequate LOS C or better during the AM and PM peak hours for both existing plus project and build-out conditions. The following lane configurations were assumed in the analysis at "A" Street/Driveway D:

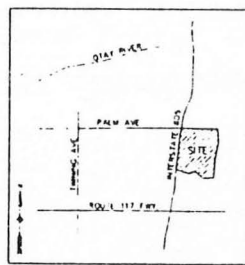
Northbound:	two through lanes, one left-turn lane
Southbound:	two through lanes, one right-turn lane
Eastbound:	one left-turn lane, one left/right shared lane

The intersection of "A" Street and Driveway E would also be signalized. It would have the same number of lanes as Driveway D, except that a separate southbound right-turn lane would not be needed. The intersection would operate at a satisfactory LOS C.

Significance of Impact

Implementation of the project would result in a substantial increase over the number of trips assumed for the project site by community plan travel forecasts and would cause the level of service at several locations to drop below LOS C. Consequently, the project would have significant direct and cumulative impacts on traffic circulation in the study area.

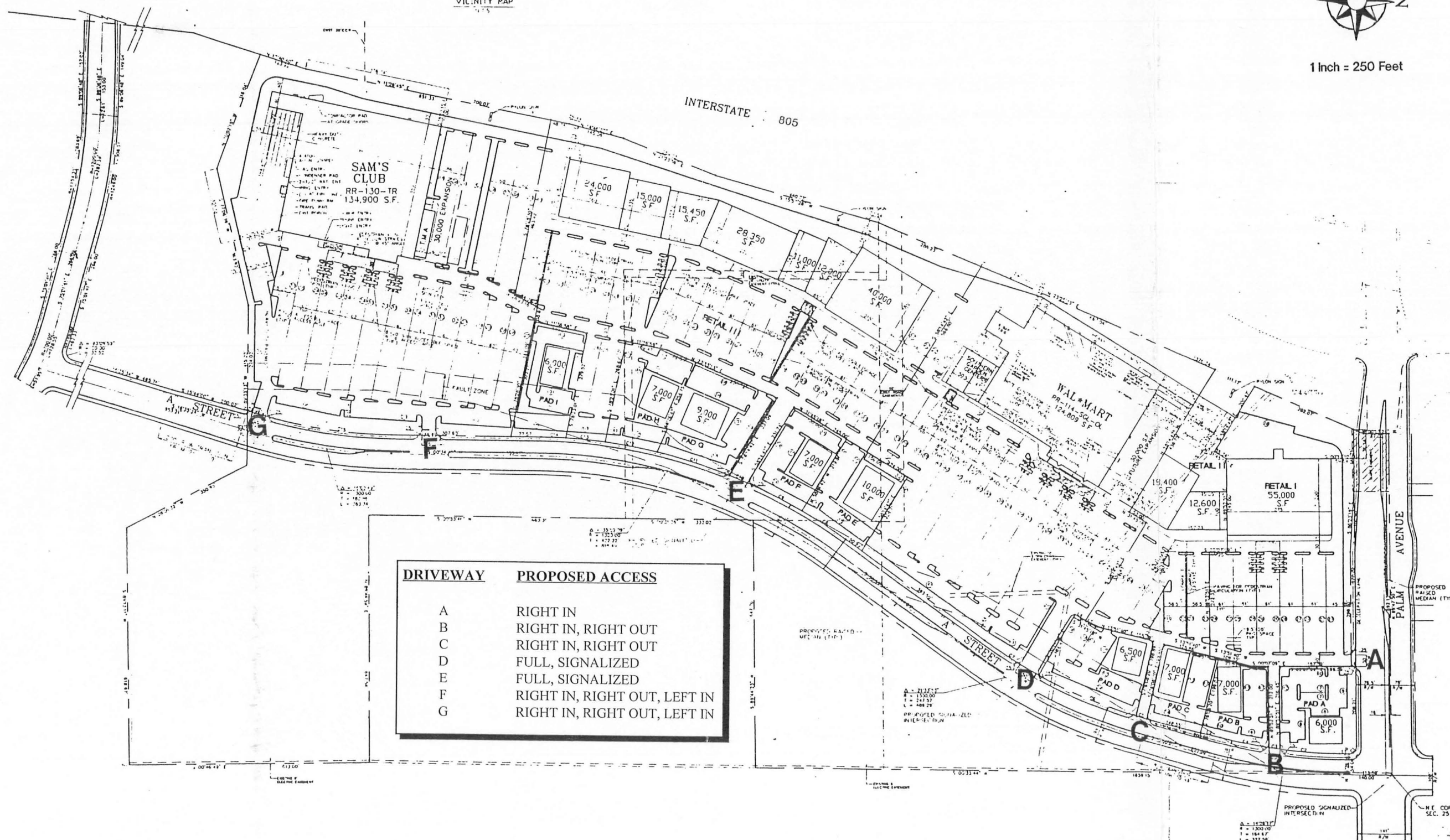
Under existing plus project conditions, the intersection analysis revealed that the intersections of Palm Avenue and the southbound and northbound I-805 ramp terminals would be significantly impacted, since they would be operating with LOS D during PM peak hours.



VICINITY MAP



1 Inch = 250 Feet



There would be a significant cumulative impact under the interim conditions with project scenario, which would consist of project traffic and traffic associated with 1513 dwelling units and 5.5 acres of commercial development in the area east of Palm Avenue. The I-805 Palm Avenue interchange under this scenario would operate at an unacceptable LOS D in the afternoon peak hour.

Under the buildout with project conditions, there would be significant cumulative traffic impacts on the Palm Avenue/"A" Street intersection, the I-805/Palm Avenue ramp terminals, and the intersection of Del Sol Boulevard and "A" Street. Using the number of lanes assumed by the San Diego travel forecasts, the intersection operation of Palm Avenue/"A" Street was analyzed and found to be significantly impacted by project traffic. The intersection would operate at LOS D in the AM peak hour and LOS E during the PM peak hour. With ultimate lane assumptions at the I-805/Palm Avenue interchange, the ramp terminals would operate at LOS D in the AM and PM peak hours. The intersection of Del Sol Boulevard and "A" Street was found to satisfy signal warrant criteria based upon estimated average daily traffic for the build-out with project conditions. This intersection would operate at an unacceptable LOS D during the PM peak hour.

With respect to site access, signal warrant analysis determined that, without signalization, the project would have potentially significant impacts at two driveways.

Mitigation, Monitoring and Reporting

Existing plus project impacts on the northbound I-805/Palm Avenue ramp terminals would be reduced below a level of significance with implementation of the measure provided below. However, with this measure, the impact to the southbound I-805/Palm Avenue ramp terminals under the existing plus project and interim conditions with project scenarios would remain unmitigated, operating at LOS D during the PM peak hour.

Build-out with project impacts on the southbound and northbound ramp terminals would remain unmitigated (LOS D) even after ultimate improvements are made to the interchange. These ultimate improvements, which include widening of the Palm Avenue overpass, are not included as project mitigation. No measures have been identified which would fully mitigate the project's cumulative impact on the I-805/Palm Avenue interchange to below a level of significance. It is possible that the CALTRANS Project Study Report/Project Report process leading to implementation will identify such a measure.

Mitigation Measure IV.C.1: ~~Prior to the issuance of building permits,~~ Prior to recordation of the Final Map, the project applicant shall assure the lane configurations shown on Figure IV-14 for the interchange of Palm Avenue/I-805, subject to the satisfaction of the City Engineer and CALTRANS. The project applicant shall also assure the installation of traffic signals for the southbound and northbound ramp terminals, subject to the satisfaction of the City Engineer and CALTRANS.

Build-out with project impacts on the Palm Avenue/"A" Street intersection would be reduced but remain significant with implementation of the mitigation measure provided below. As shown in Figure IV-14, this measure would reconfigure the lanes previously assumed by the Community Plan. Level of service during the AM peak hour would remain at LOS D and improve from LOS E to LOS D during the PM peak hour. No project mitigation is available to avoid the unacceptable LOS D (AM) and D (PM) at the intersection after implementation of the following measure:

Mitigation Measure IV.C.2: ~~Prior to issuance of building permits,~~ Prior to recordation of the Final Map, the project applicant shall assure a traffic signal and lane configurations shown in Figure IV-14 for the Palm Avenue/"A" Street intersection, subject to the satisfaction of the City Engineer.

Implementation of the following mitigation measure would reduce potentially significant site access impacts to below a level of significance:

Mitigation Measure IV.C.3: ~~Prior to issuance of building permits,~~ Prior to recordation of the Final Map, the project applicant shall assure lane configurations shown on Figure IV-14 and installation of traffic signals at the intersections of "A" Street/Driveway "D" and "A" Street/Driveway "E", subject to the satisfaction of the City Engineer.

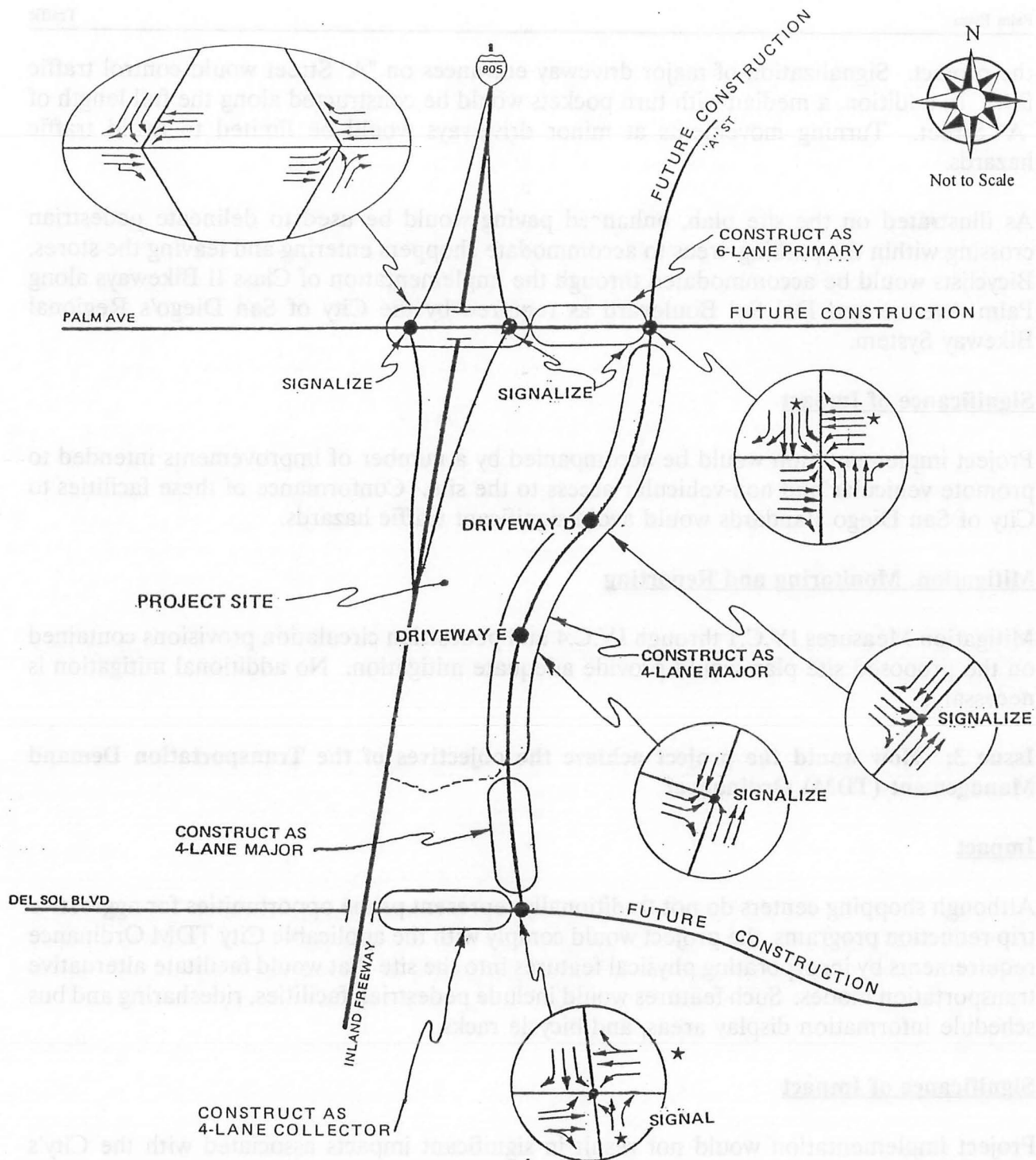
Implementation of the following mitigation measure would ensure that under buildout with project conditions, the intersection of Del Sol Boulevard/"A" Street would operate at LOS B during the morning peak hour. However, during the PM peak, the unacceptable LOS D operating condition would remain significant and unmitigated.

Mitigation Measure IV.C.4: ~~Prior to issuance of building permits,~~ Prior to recordation of the Final Map, the project applicant shall assure lane configurations shown on Figure IV-14 and installation of a traffic signal at the intersection of Del Sol Boulevard and "A" Street, subject to the satisfaction of the City Engineer.

Issue 2: Would the proposed project result in an increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?

Impact

The proposed project would accomplish a number of roadway improvements intended to accommodate expected vehicular and non-vehicular modes of transportation. As discussed earlier, the project would construct Palm Avenue (between I-805 and "A" Street) and "A" Street (between Palm Avenue and Del Sol Boulevard) and Del Sol Boulevard (between "A" Street and the existing eastern terminus of Del Sol Boulevard) to their ultimate classifications. Pavement widening, restriping and installation of traffic signals at the I-805/Palm Avenue interchange would accommodate the increased traffic volumes related to



Source: Kimley-Horn and Associates, Inc.

★ NOT A PART OF INITIAL CONSTRUCTION. INTERSECTION STRIPING FOR INTERIM CONDITIONS TO BE DETERMINED.

the project. Signalization of major driveway entrances on "A" Street would control traffic flow. In addition, a median with turn pockets would be constructed along the full length of "A" Street. Turning movements at minor driveways would be limited to avoid traffic hazards.

As illustrated on the site plan, enhanced paving would be used to delineate pedestrian crossing within the parking areas to accommodate shoppers entering and leaving the stores. Bicyclists would be accommodated through the implementation of Class II Bikeways along Palm Avenue and Del Sol Boulevard as required by the City of San Diego's Regional Bikeway System.

Significance of Impact

Project implementation would be accompanied by a number of improvements intended to promote vehicular and non-vehicular access to the site. Conformance of these facilities to City of San Diego standards would avoid significant traffic hazards.

Mitigation, Monitoring and Reporting

Mitigation Measures IV.C.1 through IV.C.4 and pedestrian circulation provisions contained on the proposed site plan would provide adequate mitigation. No additional mitigation is necessary.

Issue 3: How would the project achieve the objectives of the Transportation Demand Management (TDM) Ordinance?

Impact

Although shopping centers do not traditionally represent prime opportunities for aggressive trip reduction programs, the project would comply with the applicable City TDM Ordinance requirements by incorporating physical features into the site that would facilitate alternative transportation modes. Such features would include pedestrian facilities, ridesharing and bus schedule information display areas, and bicycle racks.

Significance of Impact

Project implementation would not result in significant impacts associated with the City's TDM Ordinance.

Mitigation, Monitoring and Reporting

No mitigation measures are required.

D. BIOLOGY

The following section is based upon the Biology Technical Report prepared for the project site by Regional Environmental Consultants (RECON) on December 22, 1992. This report is contained in Appendix C of the technical appendices.

Existing Conditions

Onsite Vegetation

Five vegetation types were identified onsite (Figure IV-15): maritime succulent scrub, Diegan coastal sage scrub, non-native grassland, mule fat scrub, and seasonal isolated wetland. The description of onsite vegetation includes the areas offsite which would be impacted by the construction of "A" Street through the project site. Below is a brief description of each of these vegetation types.

Maritime Succulent Scrub

This plant community consists of low, open scrub-dominated by drought-deciduous shrubs with a rich mixture of stem and leaf succulents and cacti. Many of the species in this community have limited distribution within the United States, are recognized as rare or threatened, and are endemic to this habitat. This plant community typically occupies the more xeric steep slopes near the coast. Because of the limited geographical restriction and ongoing loss of this habitat, the California Department of Fish and Game (CDFG) considers maritime succulent scrub a rare or threatened plant community.

Approximately 7.9 acres of this habitat are found on south and east-facing slopes of major drainages along the eastern boundary of the site. Approximately 0.2 acres occur in the grading area adjacent to the site. The dominant species are San Diego bur-sage (*Ambrosia chenipodiifolia*), jojoba (*Simmondsia chinensis*) and cliff spurge (*Euphorbia misera*). Of the total acreage of maritime succulent scrub, 0.7 acres are disturbed since they contain a much lower density of native shrubs, have a larger amount of non-native grasses and ruderal species, and are extensively fragmented by off-road vehicle activity.

Diegan Coastal Sage Scrub

This plant community typically occupies dry areas and slopes in coastal southern California. On the project site, it occupies approximately 8.0 acres on the north-facing slopes and dry canyon bottoms along major drainages. Approximately 0.9 acres occur in the offsite grading area adjacent to the east. The dominant species are coastal sagebrush (*Artemisia californica*) and lemonadeberry (*Rhus integrifolia*) with scattered jojoba and flat-top buckwheat (*Eriogonum fasciculatum* ssp. *fasciculatum*). Dense stands of lemonadeberry and toyon (*Heteromeles arbutifolia*) are also present throughout this habitat. The absence of non-native

weedy vegetation indicates that portions of the community have remained relatively undisturbed. Approximately 3.4 acres of this Diegan coastal sage scrub are considered disturbed by high levels of recreational vehicle activity on the slopes supporting this vegetation.

Non-native Grassland

Non-native grassland exists on approximately 33.5 acres of the western portion of the site. Approximately 0.2 acres occur in the offsite area to be graded for the onsite portion of "A" Street. It is characterized by a dense cover of annual grasses associated with native annual wildflowers and introduced weedy species. Slender wild oats (*Avena barbata*), red brome (*Bromus rubens*), cheeseweed (*Malva parviflora*), and black mustard (*Brassica nigra*) are the dominants.

Mule Fat Scrub

Approximately 0.4 acres of mule fat scrub (*Baccharis glutinosa*) are found onsite. This vegetation is found in the bottom of artificial pond which lies on the southern project boundary. Surrounding the mule fat, on the pond slopes, is an open ring of elderberry (*Sambucus mexicana*) and lemonadeberry. One black willow (*Salix gooddingii*) is also present there. The pond no longer holds water because the pond's dam has been breached.

Seasonal Isolated Wetland

A small seasonal isolated wetland exists along the western edge of the site. This 360 square-foot area was completely dry during the recent survey (November, 1992). The area lacks indigenous, annual plant species which are indicative of vernal pools. It has only dove weed (*Eremocarpus setigerus*) in the center and rabbitfoot grass (*Polypogon monspeliensis*) along the perimeter.

Disturbed Areas

Large areas have been denuded by recreational vehicle activity and trash dumping. The project contains approximately 37.9 acres of disturbed land. Another 2.4 acres has been disturbed on adjacent property which would be graded to construct the onsite portion of "A" Street.

Offsite Vegetation

The 9.5-acre area which would be impacted by the proposed offsite extension of "A" Street and Del Sol Boulevard to the south of the project site primarily consists of 6.2 acres of disturbed areas. Vegetated areas include 2.7 acres of non-native grassland, 0.4 acre of Diegan coastal sage scrub, and 0.2 acre of mule fat scrub (Figure IV-16).

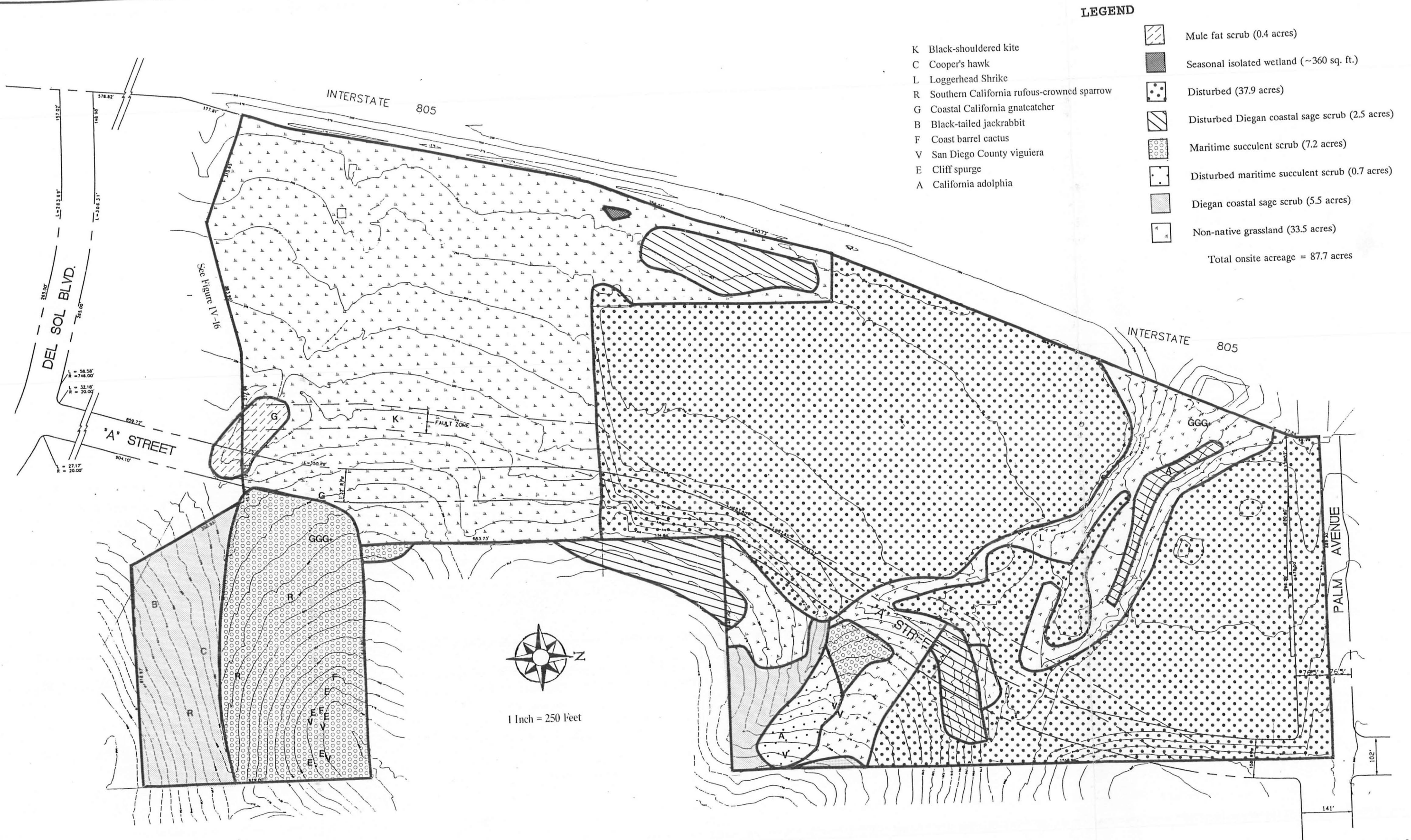


Figure IV-15



Not to Scale

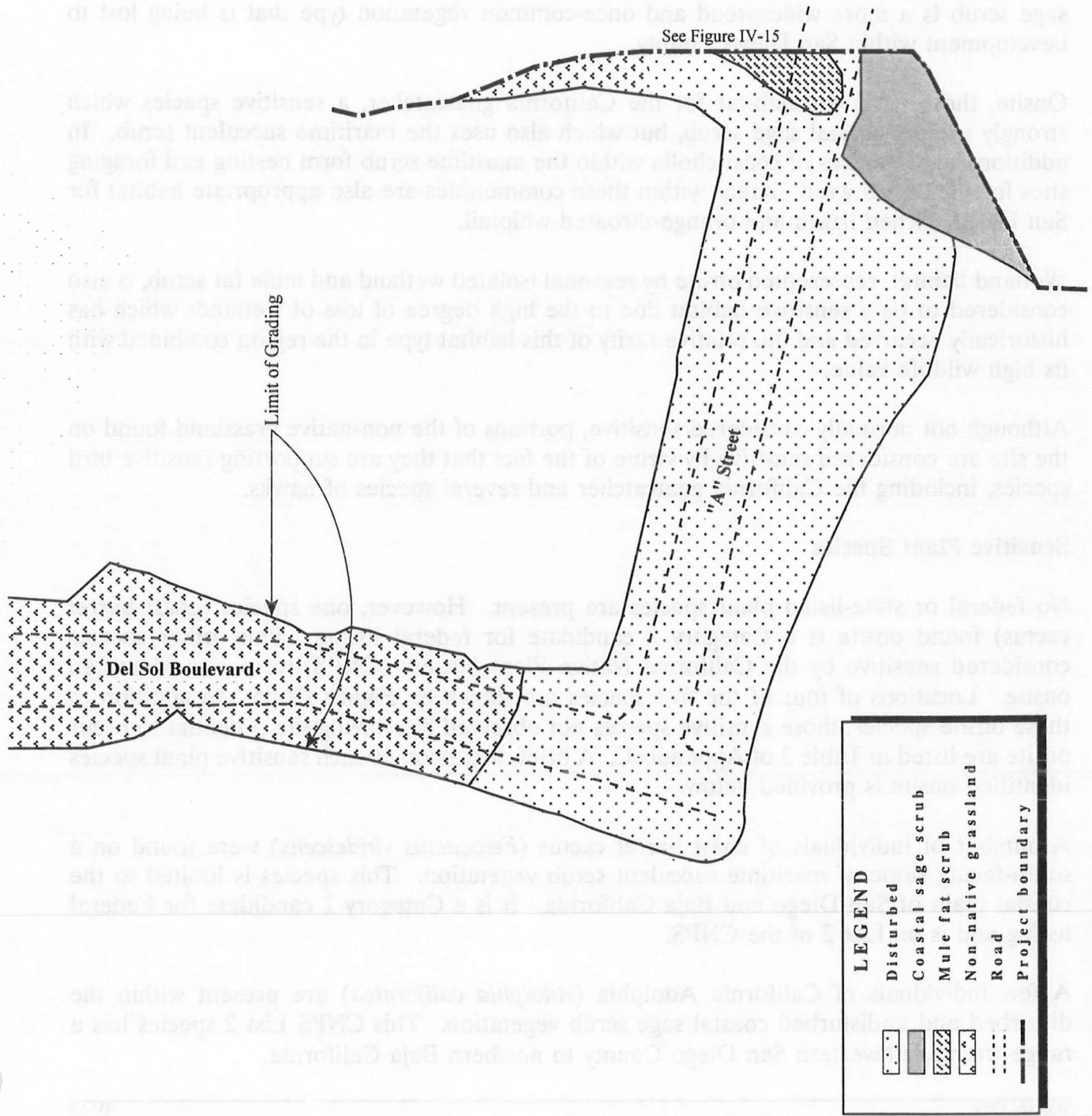


Figure IV-16

Biology Map (Offsite)

Sensitive Plant Communities

Maritime succulent scrub and Diegan coastal sage scrub are considered sensitive habitats. This designation is based upon the cumulative losses of these community types in recent time and on the trend for continued losses due to agricultural and urban uses. Maritime succulent scrub is restricted on the mainland to an area within a few miles of the coast between southwestern southern California to El Rosario in Baja California. Diegan coastal sage scrub is a more widespread and once-common vegetation type that is being lost to development within San Diego County.

Onsite, these types are habitat for the California gnatcatcher, a sensitive species which strongly prefers coastal sage scrub, but which also uses the maritime succulent scrub. In addition, large patches of coast cholla within the maritime scrub form nesting and foraging sites for the cactus wren. Areas within these communities are also appropriate habitat for San Diego horned lizard and orange-throated whiptail.

Wetland habitat, represented onsite by seasonal isolated wetland and mule fat scrub, is also considered to be a sensitive habitat due to the high degree of loss of wetlands which has historically occurred and the relative rarity of this habitat type in the region combined with its high wildlife value.

Although not normally considered sensitive, portions of the non-native grassland found on the site are considered sensitive by virtue of the fact that they are supporting sensitive bird species, including the California gnatcatcher and several species of hawks.

Sensitive Plant Species

No federal or state-listed plant species are present. However, one species (coast barrel cactus) found onsite is a Category 2 candidate for federal listing. Four other species considered sensitive by the California Native Plant Society (CNPS) were also identified onsite. Locations of four of the five species are shown on Figure IV-15. In addition to these onsite species, those sensitive species not observed but having the potential to occur onsite are listed in Table 3 of Appendix C. A brief discussion of each sensitive plant species identified onsite is provided below.

A number of individuals of coast barrel cactus (*Ferocactus viridescens*) were found on a south-facing slope of maritime succulent scrub vegetation. This species is limited to the coastal plain of San Diego and Baja California. It is a Category 2 candidate for Federal listing and is on List 2 of the CNPS.

A few individuals of California Adolphia (*Adolphia californica*) are present within the disturbed and undisturbed coastal sage scrub vegetation. This CNPS List 2 species has a range from southwestern San Diego County to northern Baja California.

San Diego bur-sage (*Ambrosia chenipodiifolia*) is one of the dominants present throughout the maritime succulent scrub vegetation. This species is on CNPS List 2 and is limited to the Otay Mesa region of San Diego County and northern Baja California.

Cliff spurge (*Euphorbia misera*) is distributed in sparse clumps within the maritime succulent scrub. This species is found in southern California and in Baja California. The CNPS places it on List 2.

San Diego County Viguiera (*Viguiera laciniata*), a CNPS List 2 species, ranges from southwestern San Diego County to Baja California. It is present onsite as a component of both maritime succulent scrub and Diegan coastal sage scrub vegetation.

Offsite Sensitive Plant Species

No sensitive plant species were recorded in the 9.5-acres proposed for the offsite extension of "A" Street and Del Sol Boulevard.

Zoology

A total of 35 bird, nine mammal, and two reptile species were observed while surveying the project site (Table 2, Appendix C). These and other species expected to utilize the project area are supported by the various wildlife habitats which occur on the property.

Diegan coastal sage scrub, mule fat scrub, and maritime succulent scrub habitats normally provide habitat for a moderate number of species, such as coyote (*Canis latrans*), black-tailed hare (*Lepus californicus*), desert cottontail (*Sylvilagus auduboni*), brown towhee (*Pipilo fuscus senicula*), Bewick's wren (*Thyromanes bewickii*), California thrasher (*Toxostoma redivivum*), and Anna's hummingbird (*Archilochus anna*). Some species were observed in the non-native grassland habitat.

Dominant species typically found in the grassland habitat are the valley pocket gopher (*Thomomys bottae*), loggerhead shrike (*Lanius ludovicianus*), western meadowlark (*Sturnella neglecta*), greater roadrunner (*Geococcyx californianus*), and American kestrel (*Falco sparverius*).

Sensitive Wildlife

Sensitive species identified or expected to occur onsite are listed with their current status in Table 5 of Appendix C. One species found on the site, the coastal California gnatcatcher, has been placed on the federal list as a threatened species. Other sensitive wildlife observed onsite include three four species listed by the U.S. Fish and Wildlife Service as Category 2 candidate species, three species listed by the CDFG as species of special concern (including one of the foregoing Category 2 species), and one species listed as a California fully

protected species. The location of these observations are shown in Figure IV-15 and a brief discussion of each species is provided below.

At least six coastal California gnatcatcher (*Polioptila californica californica*) were detected in Diegan coastal sage scrub, maritime succulent scrub, mulefat and non-native grassland habitats onsite. This bird's distribution ranges throughout coastal regions of Southern California and Baja California. It has been estimated that 85 to 90 percent of the gnatcatcher's historic habitat has been lost. The bird is presently listed as a threatened species under the Federal Endangered Species Act. The bird is also a CDFG species of special concern.

One Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) was observed in coastal sage scrub. Its distribution is limited to southwestern California and northwestern Baja California. It is a Category 2 candidate for Federal listing. This species is declining due to widespread destruction of sage scrub habitat for agricultural and urban development.

A Loggerhead shrike (*Lanius ludovicianus*) was observed in non-native grassland. This bird species is distributed throughout most of the continental United States and Mexico. ~~Although not formally proposed for listing.~~ The decline of loggerhead shrike populations has occurred as a result of urbanization. This species is a Category 2 candidate for Federal listing.

One adult Cooper's hawk (*Accipiter cooperii*) was flushed from the Diegan coastal sage scrub habitat during surveys. The Cooper's hawk is distributed throughout continental U.S. It has been speculated to have declined as a result of human disturbance, and urban and agricultural development associated with the loss of the hawk's riparian woodland breeding habitat. The bird is a CDFG species of special concern.

A Prairie falcon (*Falco mexicanus*) was observed flying over the property. Its distribution is limited to the Western U.S. and Mexico. The bird is also a CDFG species of special concern.

Nests for the San Diego cactus wren, coastal population (*Campylorhynchus brunneicapillus couesi*) were located onsite in maritime succulent scrub during surveys in previous years. Although not observed during the 1992 survey, the maritime succulent sage scrub is considered suitable habitat for this bird. The coastal population of this species ranges from southeastern Orange County south to the Tijuana River area. The cactus wren is threatened by the urbanization which has eliminated the majority of mesa top habitat formerly available to nesting pairs. It is a Category 2 candidate for Federal listing and is also a CDFG species of special concern.

A Black-shouldered kite (*Elanus caeruleus*) was observed foraging over non-native grassland. The distribution of this bird species is limited to Coastal California and parts of the Caribbean gulf coast. Decline of the Black-shouldered Kite is due to loss of nesting and foraging habitats to agriculture. The bird is a California fully protected species.

The San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) was observed in both grassland and coastal sage scrub habitats. Its distribution ranges from Mt. Pinos southward and west of the Peninsular range into Baja California. The decline of this species is due to urbanization. It is a Category 2 candidate for Federal listing.

The seasonal isolated wetland may support an invertebrate known as fairy shrimp. Two species could occur: San Diego and Riverside fairy shrimp. The San Diego is considered sensitive locally and the Riverside species has recently been listed as an endangered species. Inspection when standing water occurs or special soil hydration tests would be required to determine the presence of fairy shrimp.

Offsite Sensitive Species

No endangered or sensitive species were recorded in potential impact areas associated with the offsite extension of "A" Street and Del Sol Boulevard.

Issue 1: Would the proposed project result in a reduction, substantial change, or impact on any unique, rare, endangered, sensitive, or fully protected species of plants or animals, or habitats? Would the proposed project result in substantial change in biological diversity, or interfere with the movement of any resident or migratory fish or wildlife species?

Impact

Onsite

Direct biological impacts would occur over the majority of the site with grading and development. As shown in Table IV-6, development would impact 3.5 acres of Diegan coastal sage scrub, 1.5 acres of maritime succulent scrub, 32.6 acres of non-native grassland, 0.4 acres of mule fat scrub, and 360 square feet of seasonal isolated wetland. These acreages include small areas of impact immediately offsite to the east which would need to be graded to construct portions of "A" Street through the property. Impacts south of the property related to the proposed offsite construction of "A" Street and Del Sol Boulevard are addressed in the next section and corresponding acreages are included in Table IV-5.

In addition to the direct loss of native vegetation, the project would reduce potential habitat for sensitive plant and animal species found on site. The loss of Diegan coastal sage scrub, maritime succulent scrub, mulefat and adjacent non-native grasslands would reduce the

TABLE IV-6
Summary of Vegetation Impacts

Habitat	Onsite ¹ Total	Onsite Impacted	Offsite ² Impact	Total Impacts
Diegan coastal sage scrub	8.9	3.5	0.4	3.9
Maritime succulent scrub	8.1	1.5	0.0	1.5
Non-native grassland	33.7	32.6	2.7	35.3
Disturbed	40.3	39.7	0.0	39.7
Mule fat scrub	0.4	0.4	0.2	0.6
TOTAL	91.4	77.7	3.3	81.0

¹ Includes offsite grading north and east of site.

² Area to be graded to construct "A" Street and Del Sol Boulevard, south of project site.

habitat of the coastal California gnatcatcher. It is estimated that the bird is using or likely to be using a total of 5.3 acres of the project. This is a worst-case assumption based on the total amount of impacted area of occupied habitat (3.4 acres) and suitable habitat adjacent to occupied habitat (1.9 acres) (refer to Table 7 in biological survey report). The estimate includes maritime succulent scrub, non-native grassland and mulefat areas which, although normally not considered ideal habitat, were found to be used by gnatcatchers onsite.

The loss of maritime succulent scrub would also impact cactus wren, San Diego bur-sage, coast barrel cactus, cliff spurge, and potentially-occurring snake cholla. Other sensitive plant and animal species utilizing these sage scrub habitats would also be impacted. Secondary impacts to those animals remaining after development would include increased noise and greatly increased human activity in the area.

The loss of 32.6 acres of non-native grassland would impact local raptor species by diminishing potential foraging habitat for these birds. The expanse of non-native grassland on the southern half of the site has an abundance of small mammals which comprise a foraging area for raptors and the California Gnatcatcher.

Although normally considered to be significant biological resource, the expected loss of 0.4 acres of mule fat scrub and 360 square-foot seasonal isolated wetland are not considered direct significant biological impacts.

The mule fat scrub vegetation developed on the property as a result of the impoundment of water within a pond. After the mule fat became established, the dam responsible for holding water in the pond had been breached. As a result, no water collects in the pond. The pond is located in a small drainage course and without the dam to catch the small amount of runoff in this drainage, the mule fat scrub is expected to eventually die. Similarly, the seasonal isolated wetland is not considered a significant resource due to its small size, lack of sensitive species and isolated occurrence. However, if the Riverside fairy shrimp should occur in the seasonal isolated wetland, its loss would be significant due to its endangered status. In either case, the loss to wetland habitat is considered to be cumulatively significant due to the small amount of this habitat which exists in the region.

Offsite Road Improvements

Potential impacts would occur with the offsite construction of "A" Street and Del Sol Boulevard. The impacted areas would primarily consist of disturbed areas (6.2 acres), but would also include 2.7 acres of non-native grassland, 0.4 acres of Diegan coastal sage scrub, and 0.2 acres of mule fat scrub. Impacts would result from slope-cuts associated with road construction. Additional impacts that have not been estimated may take place during construction by operation of vehicles and equipment in areas not designated on the grading plan.

Significance of Impact

Further depletion of onsite and offsite Diegan coastal sage scrub is considered significant in both a direct and cumulative sense. Significant impacts would occur to populations of the coastal California gnatcatcher by loss of this habitat. Incremental loss of other sensitive plant and animal species associated with Diegan coastal sage scrub would also be considered cumulatively significant.

Because of their rarity and limited distribution, impacts to maritime succulent scrub and consequently, the cactus wren, snake cholla, San Diego bur-sage, coast barrel cactus, and cliff spurge would be considered a direct significant impact.

The impact on foraging habitat and prey species in the southern non-native grassland is cumulatively significant. The loss of this habitat could potentially affect local populations of raptors and sensitive species which potentially occur in this habitat.

The loss of the mule fat scrub (0.4 acres) and seasonal isolated wetland (360 square feet) is not considered a direct significant impact due to the low quality of the habitat and the

expectation that the mule fat scrub will die off due to the lack of permanent water supply. Similarly, the loss of the seasonal isolated wetland would not be significant unless inhabited by the Riverside fairy shrimp. However, the loss of any amount of wetland is considered cumulatively significant.

Mitigation, Monitoring and Reporting

The City of San Diego has determined appropriate compensation ratios for Diegan coastal sage scrub and maritime succulent scrub to be 2:1. Mitigation for the impact of the project on coastal California gnatcatchers is more problematic due to the fact that the bird has only recently been listed as Threatened and no guidelines exist to define adequate mitigation. However, traditionally, a 2:1 compensation ratio for impacted gnatcatcher habitat has been used.

The mitigation for the impacts to the 3.9 acres of Diegan coastal sage scrub and 1.5 acres of maritime succulent scrub would be accomplished by preserving 10.8 acres of high quality Diegan coastal sage scrub in the Lakeside community. The general area within which the mitigation site will occur is illustrated on Figure IV-17. Preliminary biological surveys of this property show that it contains relatively undisturbed, high quality Diegan coastal sage scrub; portions of which support the coastal California gnatcatcher. Furthermore, the site is adjacent to a large expanse of native habitat which has been identified as a high priority area in the regional open space system. While the site does not contain maritime succulent scrub, the high value of the Diegan coastal sage scrub habitat and the presence of gnatcatchers is considered adequate mitigation for the project impacts to maritime succulent scrub as well as Diegan coastal sage scrub.

Implementation of the following mitigation measures would fully mitigate potential biological resource impacts.

Mitigation Measure IV.D.1: Prior to issuance of a grading permit or recordation of the final map, the applicant shall demonstrate to the satisfaction of the City Planning Director that 10.8-7.8 acres of high quality Diegan coastal sage scrub and 3.0 acres of high quality maritime succulent scrub have been preserved within the area shown on Figure IV-17. A recorded easement document or other document assuring acquisition of the mitigation acreage shall be provided to the Planning Director which defines the conditions and limitations for the use of the mitigation area. Compensation may occur at other locations with the approval of the City Planning Director.

Mitigation Measure IV.D.2: Prior to issuance of a grading permit or recordation of a final map, soil hydration tests shall be completed to determine whether the endangered Riverside fairy shrimp inhabits the seasonal wetland located on the property. A letter report from a qualified biologist detailing the methodology used and the results shall be approved by the Planning Director. If the species does occur, evidence shall be provided before



Offsite Compensation Area

Figure IV-17

commencement of grading that a Section 7 or 10(a) agreement has been reached with the U.S. Fish and Wildlife Service.

Mitigation of the potential noise impacts on the California gnatcatcher and San Diego cactus wren would require that grading not occur during the breeding season (early March through July). The applicant is not proposing this mitigation because it could conflict with their proposed construction schedule.

In addition to the above mitigation measures, the project applicant is proposing to contribute \$10,000 to the City of San Diego's Mitigation Bank Program to help compensate for the cumulative biological impacts. This contribution, however, does not fully mitigate for these impacts.

E. AIR QUALITY

The following discussion addresses potential air quality impacts associated with Palm Plaza and summarizes the Air Quality Impact Analysis prepared by Giroux and Associates on December 15, 1992. The technical air quality analysis is included in Appendix D of the technical appendices.

Existing Conditions

Climate and Meteorology

The climate of the project site is typical of the San Diego region. It is characterized by frequent early morning cloudiness, hazy afternoon sunshine, clean daytime onshore breezes, nighttime offshore breezes and relatively consistent year round temperatures. An average of 10 inches of rainfall occurs from November through April each year. The remainder of the year is typically dry. These atmospheric conditions combine to limit the ability of the atmosphere to disperse air pollution generated by the regional population.

Daytime onshore flows and nocturnal land breezes are accompanied by characteristic temperature inversions that control the vertical depth through which pollutants can be mixed. The strong onshore flow undercuts a huge layer of warm sinking air within the high pressure cell. The interface between the cool layer near the ground and the warm layer aloft is the boundary where the normal decrease of temperature with height is reversed (an inversion). As the polluted layer moves toward the topographically higher inland, the height of the inversion remains relatively the same and thus becomes highly concentrated. During winter nights the air near the ground cools from contact with the radiating ground surface while the air aloft remains warm and therefore the radiation inversion is very shallow and occurs in conjunction with nearly calm winds. The shallow vertical barrier and the light horizontal transport lead to a marked stagnation of emissions from localized sources such as freeways, large parking lots, and major intersections. Such microscale "hot spots" associated with these cool-season radiation inversions are less pervasive, less severe, and more amenable to mitigation than the regional photochemical air pollution that occurs with regional, warm-season marine/subsidence inversions.

Air Quality

In order to assess the air quality impact of any proposed project, that impact, together with baseline air quality levels, must be compared to applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare (Table IV-7). National Ambient Air Quality Standards (AAQS) were established in 1971 for six pollution species. States were given the option of adopting more stringent standards or including additional pollution species. Because California already had standards in existence before the federal AAQS were

TABLE IV-7
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm (180 ug/m3)	Ultraviolet Photometry	0.12 ppm (235 ug/m3)	Same as Primary Std.	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m3)	Non-dispersive Infrared Spectroscopy (NDIR)	9.0 ppm (10 mg/m3)	Same as Primary Stds.	Non-dispersive Infrared Spectroscopy (NDIR)
	1 Hour	20 ppm (23 mg/m3)		35 ppm (40 mg/m3)		
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemiluminescence	0.053 ppm (100 ug/m3)	Same as Primary Std.	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 ug/m3)		-		
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	80 ug/m3 (0.03 ppm)	-	Pararosaniline
	24 Hour	0.05 ppm (131 ug/m3)		365 ug/m3 (0.14 ppm)	-	
	3 Hour	-		-	1300 ug/m3 (0.5 ppm)	
	1 Hour	0.25 ppm (655 ug/m3)		-	-	
Suspended Particulate Matter (PM ₁₀)	Annual Geometric Mean	30 ug/m3	Size Selective Inlet High Volume Sampler and Gravimetric Analysis	-	-	-
	24 Hour	50 ug/m3		150 ug/m3	Same as Primary Stds.	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	-		50 ug/m3		
Sulfates	24 Hour	25 ug/m3	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average	1.5 ug/m3	Atomic Absorption	-	-	Atomic Absorption
	Calendar Quarter	-		1.5 ug/m3	Same as Primary Std.	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 ug/m3)	Cadmium Hydroxide STRactan	-	-	-
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 ug/m3)	Tedlar Bag Collection, Gas Chromatography	-	-	-
Visibility Reducing Particles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70%		-	-	-

ARB Fact Sheet 38 (revised 7/88)

established, and because of unique meteorological problems in California, there is considerable diversity between state and federal clean air standards

In 1977, Congress amended the Clean Air Act and required each state to prepare a State Implementation Plan (SIP) containing proposed methods of achieving the NAAQS where non-attainment presently exists, and to maintain the NAAQS where air quality is better than the NAAQS. States were required to submit to the EPA a SIP showing attainment by December 1982 for all criteria pollutants. With the passage of both the 1982 and 1987 (extension for O₃ and CO) attainment deadlines, additional planning cycles were initiated. The passage of the California Clean Air Act (AB-2595) imposed a new set of requirements to document how excess emissions would be reduced by five percent each year. A new national Clean Air Act was also passed in late 1990. With San Diego designated as a "moderately degraded" airshed, the federal law will require attainment in 1996-97.

The nearest air quality monitoring measurements are made at East "J" Street in downtown Chula Vista by the San Diego County Air Pollution Control District (APCD). A summary of the monitored data from the last six years is included in Table IV-8. The data illustrates a healthful air quality in nearly every pollution category for the six-year period with the only exception being an occasional violation of the national ozone standard (one violation per year is allowed under federal guidelines). The more stringent state standards for ozone and total suspended particulates were also exceeded. Overall, air quality in Chula Vista, as representative of the project site, is very good when compared to other areas in the San Diego Air Basin (SDAB).

Violations of national AAQS in the SDAB, particularly those for ozone in inland foothill areas, require that a plan be developed outlining the stationary and mobile source pollution controls that were to be undertaken to improve air quality. A regional air quality management plan (AQMP), addressing both the attainment of federal standards as well as an attainment program for state standards as mandated by the California Clean Air Act (AB-2595, Sher), was released in the SDAB in 1991. The basic conclusion of the SDAB analysis is that clean air standards for ozone can be met in a 1996-97 timeframe from pollutants released within San Diego County, but that violations of ozone standards will continue well beyond 2000 because of the intrusion of Southern California Air Basin pollutants.

The new AQMP for the San Diego Air Basin incorporates the AB-2595 requirement to reduce excess air emissions by five percent annually to ultimately attain all federal and state clean air standards by 2007. Those standards currently in violation in some part of the air basin include the state and federal standards for ozone and carbon monoxide, and also the California standards for nitrogen dioxide and respirable particulate matter (PM-10). Under the federal Clean Air Act passed in November 1990, the San Diego Air Basin is classified as severely polluted which requires attainment of federal standards by the end of 1997. Given that the federal attainment schedule is consistent with the AB-2595 plan, the bulk of

TABLE IV-8
San Diego Area Air Quality Monitoring Summary

Pollutant/Standard	1985	1986	1987	1988	1989	1990
Ozone:						
1-Hour > 0.09 ppm	28	20	15	17	21	21
1-Hour > 0.12 ppm	4	2	2	4	7	3
1-Hour ≥ 0.20 ppm	1	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.20	0.14	0.16	0.22	0.16	0.15
Carbon Monoxide:						
1-Hour > 20. ppm	0	0	0	0	0	0
8-Hour > 9. ppm	0	0	0	0	0	0
Max. 1-Hour Conc. (ppm)	7.	7.	7.	7.	8.	7.
Max. 8-Hour Conc. (ppm)	3.9	5.1	3.4	3.6	4.7	4.8
Nitrogen Dioxide:						
1-Hour > 0.25 ppm	0	0	0	1	0	0
Max. 1-Hour Conc. (ppm)	0.16	0.14	0.15	0.21	0.16	0.13
Total Suspended Particulates:						
24-Hour ≥ 100 µg/m ³	0/61	1/61	1/30	4/46	3/57	1/61
24-Hour > 260 µg/m ³	0/61	0/61	0/30	0/46	0/57	0/61
Max. 24-Hour Conc. (µg/m ³)	96.	119.	100.	109.	111.	163.
Particulate Sulfate:						
24-Hour ≥ 25. µg/m ³	0/54	0/60	0/51	0/57	0/60	0/51
Max. 24-Hour Conc. (µg/m ³)	15.4	17.6	13.3	17.2	16.5	16.8
Inhalable Particulates (PM-10):						
24-Hour > 50 µg/m ³	-----	3/51	5/61	3/56	7/61	7/62
24-Hour > 150 µg/m ³	-----	0/51	0/61	0/56	0/61	0/62
Max. 24-Hour Conc. (µg/m ³)	-----	104.	68.	58.	69.	67.

Note: Standards for sulfur dioxide and particulate lead have been met with a wide margin of safety in 1985-90, and are, therefore, not shown.

Source: California Air Resources Board, Summary of Air Quality Data, 1985-90. Chula Vista APCD Monitoring Station (except for some particulate data which are from San Diego APCD Island Avenue Station.)

the planning that will be required for the federally-required AQMP will have been completed under the state planning requirements.

Issue 1: Would the proposed project affect the ability of the revised Regional Air Quality Strategy to meet the federal clean air standards?

Impact

The proposed project would not affect the ability of the revised RAQs to meet federal clean air standards. Although commercial developments affect mobile source generation, they are not primary emitters of air pollutants. Project consistency with regional air quality planning is determined in terms of whether overall growth has been correctly anticipated in a given sub-region. Commercial uses are growth-accommodating and not growth-inducing. They provide services for existing needs and do not cause generation of trips that would not otherwise occur. Commercial uses are thus related to air quality planning inasmuch as the rate of growth accommodated is consistent with the air quality planning process.

Significance of Impact

The project would not significantly impact the effectiveness of the revised RAQS. As a commercial center, the project would not represent a major new emission generator. The net effect of the project, from a basin-wide perspective, would be a redistribution of already forecast shopping trips within the air basin.

Mitigation, Monitoring, and Reporting

None required.

Issue 2: Would the proposed project result in the exposure of sensitive receptors to substantial pollutant concentration, create objectionable odors, create dust, or alter local air movement?

Impact

Air quality impacts related to the project would be associated with short-term construction activities and long-term operation of the shopping center. Each of these are discussed below.

Construction Impacts

Development of the project would create temporary emissions of fugitive dust from soil disturbance and combustion emissions from onsite construction equipment and from offsite

transport of excavated materials, delivery of construction materials, and use of construction worker vehicles.

Dust emissions in the San Diego region are generally substantial during soil disturbance. The average uncontrolled dust emission rate during construction is approximately 1.2 tons per acre per month of disturbance. It should be noted that this is a universal factor that may not necessarily be completely applicable to the specific soil conditions present at the project site. Specific dust control measures required by the San Diego APCD can reduce the emissions by roughly three-fourths. The amount of dust generated during grading of the project would be approximately 26.4 pounds per acre per day or approximately 1,320 pounds for the 50+ acre site. With implementation of the control measures daily dust emissions would be reduced by nearly 50 percent (660 pounds per day). The project would be considered a major source of air pollution by the APCD since it would contribute over 250 pounds of emissions per day.

There are no nearby sensitive receptors that might be affected within the normal deposition area downwind of the project site toward the east. However, during strong Santa Ana winds from east to west, homes west of Interstate 805 could receive larger dust particles from the site. Stronger winds also carry much larger particles and carry them farther than does normal airflow.

Onsite and offsite construction equipment (primarily diesel powered) requires an average of 200,000 brake horsepower hours (BHP-HR) of operations to buildout an acre of land into roads and structures. Based on an 18-month total construction schedule, project construction equipment would produce the following combustion emissions daily: Reactive Organic Compounds (39.7 pounds); Carbon Monoxide (155.2 pounds); Nitrogen Oxides (554.8 pounds); and Particulate Matter (10 - 39.4 pounds).

Although daily nitrogen oxide emissions are substantial, the mobile nature of construction equipment would prevent any localized violation of the nitrogen oxide standard. Emissions would also be dispersed over a wide area. There could be localized instances in which the characteristic diesel exhaust odor would be noticeable, however, with normal daytime west to east winds, residential development west of Interstate 805 would be upwind of onsite emissions and therefore would not be adversely exposed.

Operational Impact

Operation of the proposed project could potentially impact air quality through mobile emissions (vehicular) and stationary emissions.

Mobile emissions resulting from the implementation of the project would constitute the most significant air quality concern. The emissions burden associated with the project would result in emissions for reactive organics, carbon monoxide and nitrogen oxides that exceed

the APCD insignificance level (Appendix D). However, this does not indicate that a significant direct air quality impact would result from this project. It can be assumed that indirect sources, with identical emissions, would be constructed elsewhere without the proposed project. The same shopping trips that would be made to the proposed project would be made to another center without the project, and therefore, the same emissions would occur.

While the project would not result in any significant direct impacts, it would create significant cumulative impacts to the San Diego Air Basin. Although project-related traffic can be considered as redistributed traffic for retail that would occur at some other location, localized congestion may result in cumulative impacts. Congestion on roadway segments and at intersections most often results in elevated carbon monoxide (CO) levels.

In determining the potential CO impacts of congestion caused by the project on air quality, several standards are applicable. Health standards are established by the State and Federal governments as addressed in Table IV-8. In addition to health standards, levels of service (LOS) on the roadways are used as a measure of air quality impacts. For intersections, LOS D to F is normally considered to be a direct air quality impact as it has the potential to cause CO "hot spots" which exceed State and Federal standards. In addition, unacceptable levels of service on major roads generate excessive amounts of CO which, while not in excess of State and Federal standards, compound CO problems within the San Diego Air Basin. Any decrease in the roadway level of service (LOS) which results in more than 550 pounds of CO per day is considered cumulatively significant with respect to the San Diego Air Basin. The 550 pounds per day standard is assumed to be exceeded on Major Streets when the LOS drops to "F"; a drop to LOS "E" on Prime Arterials would exceed the 550 pounds per day threshold.

The traffic analysis in Section IV.C concludes that the LOS on Palm Avenue, a Prime Arterial, would be LOS F which would cause the CO emissions to exceed 550 pounds per day (Table IV-9). The expected LOS E on "A" Street would not exceed the LOS F threshold. Thus, the project would have a cumulatively significant impact on air quality related to roadway segment impacts.

The traffic analysis concluded that two intersections would operate at LOS D or lower: the southbound ramp terminal of the I-805/Palm Avenue and Palm Avenue/"A" Street. However, Table 4 of Appendix D indicates that the one-hour CO levels at these intersections at build-out with the project would not exceed State or Federal standards. Thus, the congestion at these two intersections would not create a direct air quality impact but would contribute to the air quality problems in the San Diego Air Basin resulting in a cumulatively significant impact.

TABLE IV-9
Palm Avenue V/C Ratio

Roadway Segment	Existing	Existing Plus Project	Future No Project	Future With Project
West of I-805 (four-lane major)	0.87 (E)	1.08 ¹ (F)	1.03 (F)	1.13 (F)
I-805 - "A" Street (seven-lane prime arterial)	NA	0.59 (A)	0.66 (B)	1.02 ¹ (F)

¹ Conditions meeting the 550 pounds of CO per day significance threshold.

Stationary emissions resulting from implementation of the project would primarily be in the form of electrical generation emissions from San Diego Gas and Electric Company (SDG&E) power plants. Air emissions generated onsite resulting from consumption of electricity and natural gas would be as follows: Reactive Organic Compounds (0.2 pounds); Carbon Monoxide (3.6 pounds); Nitrogen Oxides (20.5 pounds); and Particulate Matter (10 - 0.7 pounds).

The stationary emissions associated with the proposed project would be less than the project-related source contribution. Stationary emissions resulting from the project would not significantly impact air quality.

Significance of Impact

The incremental contribution of construction-related emissions would be considered short-term and would generally result in a nuisance level impact. Mobile-source emissions associated with implementation of the project would be cumulatively significant. The unacceptable level of service expected on Palm Avenue and at the intersections of Palm Avenue/southbound ramp of I-805 and Palm Avenue/"A" Street would compound regional air quality problems. Although level of service at these two intersections would be LOS D or worse, the CO "hot spot" analysis concluded that CO levels would not exceed State or Federal standards. Similarly, CO levels along the affected portion of Palm Avenue would not exceed State or Federal CO standards.

The incremental contribution to the non-attainment status of the San Diego Air Basin would be cumulatively significant in conjunction with all other planned regional growth. Full

mitigation for the cumulative air quality impact is beyond the control of one project, therefore, this impact remains unmitigated.

Mitigation, Monitoring, and Reporting

Construction of the proposed project could create short-term construction impacts that would create a potentially significant temporary air quality impact. Similarly, long-term air quality impacts derive from transportation sources on a regional scale. Mitigation requires adequate controls on construction activities through grading or construction permits, and through adoption of a transportation demand management plan (TDM).

The following measures would reduce short-term construction impacts to below a level of significance:

Mitigation IV.E.1: ~~Construction impact mitigation shall require development and implementation of a construction dust abatement and construction management program to meet the requirements of San Diego County APCD. Prior to approval of a land development permit, the grading plans shall be reviewed by the City Engineer to assure that appropriate dust control measures are proposed. The developer shall comply with all San Diego County APCD measures regarding control of nuisance from the generation of dust and fumes during construction. Dust control measures capable of attaining dust control efficiencies of 75 percent shall be implemented. Measures shall include: (1) twice-daily watering of disturbance areas, and (2) chemical stabilization of off-road haul routes. Implementation of these measures shall be confirmed during periodic inspections by the Field Engineering Division during the grading operation.~~

Mitigation IV.E.2: Prior to issuance of building permits, the ~~City Traffic Engineer~~ TDM Administrator shall approve a Transportation Demand Management Plan. The TDM Plan shall contain enforcement provisions subject to the satisfaction of the TDM Administrator. The TDM Plan shall also include the measures recommended for regional shopping centers which include but are not limited to:

- Incorporation of transit access considerations into project design;
- Development of employee rideshare incentives; and
- Coordination of rideshare information among all site tenants via ride-matching services provided by the property manager.

F. NOISE

The following section is based upon the noise calculations prepared by Giroux & Associates on January 1993 and contained in Appendix E of the technical appendices.

Existing Conditions

Traffic from Interstate 805, lying along the western project boundary, is the only major noise source affecting the project site. Traffic noise from this freeway is already causing noise levels along its route to exceed desired levels for development.

Occasional aircraft from Brown Field fly over the project area. Brown Field is approximately two miles southwest of the project site and according to the Comprehensive Land Use Plan for the airport (Figure IV-4), the entire project lies outside of the 60 dBA CNEL noise contours of the airport.

According to the City of San Diego General Plan, retail commercial land uses are considered compatible with external noise levels up to 75 dBA CNEL and up to 65 dBA for residential uses. There are no sensitive noise receptors adjacent to the project site. Property to the north, east, and south is undeveloped. Interstate 805 runs along the length of the western boundary. Residential uses are located west of this freeway.

Issue: Would the proposed project result in a significant increase in the existing ambient noise levels or expose people to noise levels which exceed the City's adopted noise ordinance?

Impact

This discussion assesses the impact of the project on adjacent property as a "noise generator" as well as the potential impacts of adjacent roadway noise on future patrons of the project as a "noise receiver". Overall the assessment is based on a comparison of the impact of development of the property under the existing residential land use designation with the proposed commercial development.

Noise Generator

Development of the proposed project would generate noise from two principal sources, noise from operation of the center and noise generated by increased traffic volumes.

Noise levels generated by the various commercial activities including cars in the parking lots, ventilation equipment, delivery trucks, etc. would not create a significant impact on surrounding areas in that noise levels would not exceed 65 dBA on adjacent properties from the center operations. Future residential, to the south, would be separated by a six-foot

wall as required by the City Zoning Ordinance and future residential to the east would be separated by elevation and distance. Furthermore, as discussed in the following discussion, noise from "A" Street would override any operational noise effects on the future uses to the east.

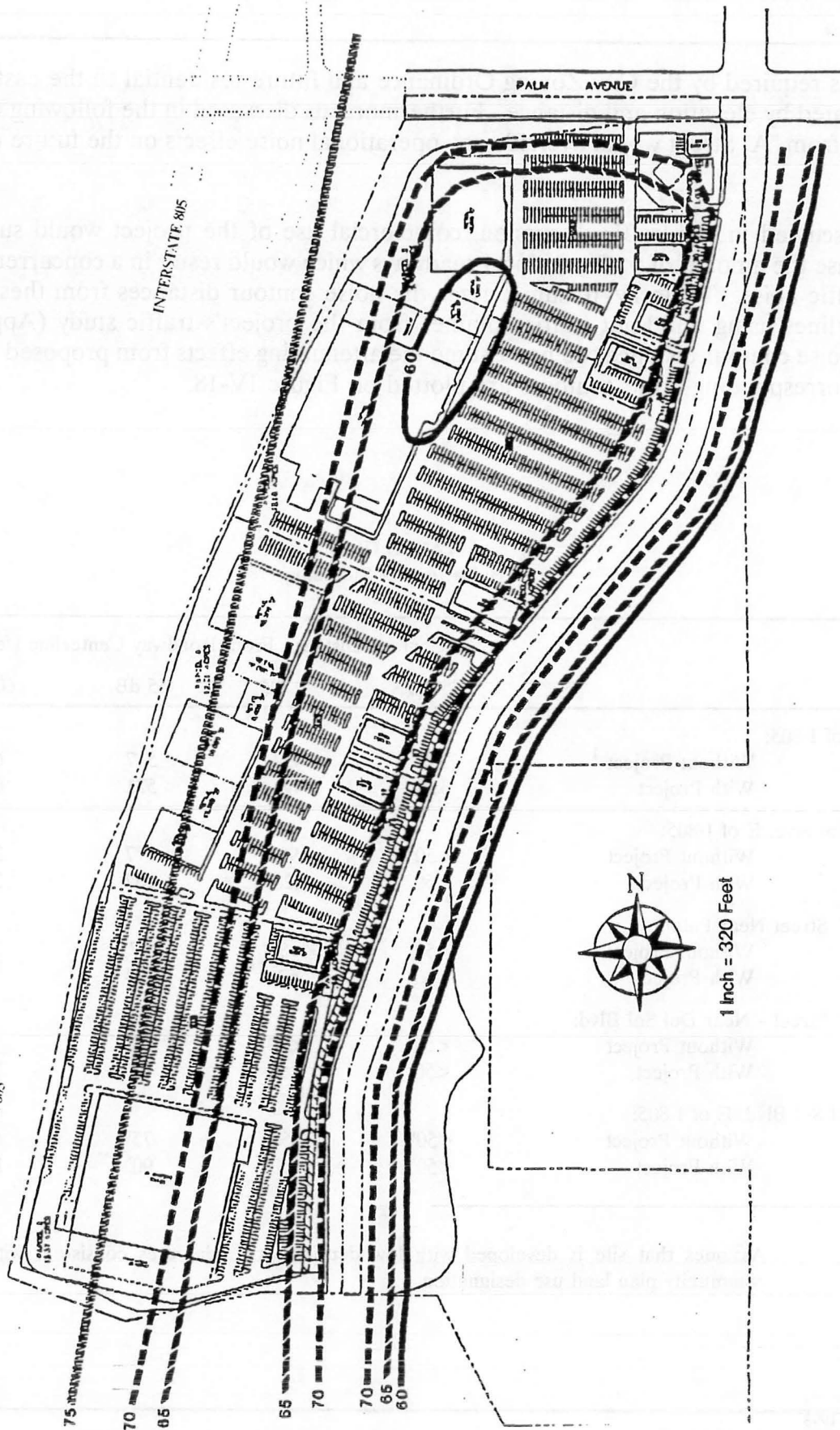
As discussed in the traffic discussion, commercial use of the project would substantially increase the amount of traffic on local roadways which would result in a concurrent increase in traffic noise. Table IV-10 summarizes the noise contour distances from these roadway centerlines using build-out traffic volumes from the project's traffic study (Appendix B). The noise contour distances do not assume the attenuating effects from proposed structures. The corresponding noise contours are plotted on Figure IV-18.

TABLE IV-10
Noise Impact Summary

		Contour Distance From Roadway Centerline (feet)			
		75 dB	70 dB	65 dB	60 dB
E of I-805:					
	Without Project ¹	352	492	517	647
	With Project	356	496	521	651
Palm Ave. E of I-805:					
	Without Project	<50	98	177	335
	With Project	<50	128	207	365
"A" Street Near Palm:					
	Without Project	<50	<50	57	124
	With Project	<50	62	124	139
"A" Street - Near Del Sol Blvd:					
	Without Project	<50	<50	<50	68
	With Project	<50	<50	95	124
Del Sol Blvd. E of I-805:					
	Without Project	<50'	<50'	75'	90'
	With Project	<50'	<50'	90'	105'

¹ Assumes that site is developed with low density residential uses consistent with existing community plan land use designation.

INTERSTATE 805



Palm Plaza Noise Contours (dBA Ldn)

Figure IV-18

In assessing the impact of the increased traffic noise, it was assumed that any increase greater than 3 dBA would be significant; noise increases of less than 3 dBA are generally considered imperceptible to the people. Offsite noise impacts from project implementation range from less than 0.1 dBA along I-805 to 6.5 dBA along "A" Street near Del Sol Boulevard. Thus, it is concluded that the increase in traffic noise would be significant along "A" Street but not significant along Palm Avenue or I-805.

A review of Table IV-8 reveals that the 65 dBA contour along "A" Street would extend approximately 67 feet beyond the centerline than would occur if the property were developed with residential uses (125 vs. 57 feet). As a result of the increased traffic noise on "A" Street, the future residential and elementary school sites to the east in California Terraces could experience noise levels in excess of 65 dBA. Without the additional project traffic, the 65 dBA contour would not have impacted these uses. As discussed earlier, noise levels in excess of 65 dBA are considered unacceptable for residential areas.

Similarly, the increased traffic on "A" Street near Del Sol Boulevard would extend the 65 dBA contour approximately 45 feet further from the road (95 vs. <50 feet). In effect, without the commercial traffic the 65 dBA contour would be confined to the street right of way while with the project traffic, the contour would extend into the adjacent property. Future residential development to the south would also experience higher noise levels due to the change in land use. The 65 dBA contour would extend 90 feet from the Del Sol Boulevard centerline, an increase of 25 feet over that which would occur without the land use change.

Noise Receiver

Because the noise limit for commercial property is 75 dBA, the project would not be significantly impacted by roadway or aircraft noise from I-805, Palm Avenue, "A" Street, or Brown Field. As illustrated on Figure IV-17, noise levels at the entrances to the commercial buildings would not exceed 75 dBA with build-out traffic volumes. From Interstate 805, the 75 dBA noise contour is estimated to encroach upon the side yard and western portion of the proposed Sam's Club and rear yards of retail buildings adjacent to the freeway. The 75 dBA noise contour from Palm Avenue and "A" Street is not estimated to encroach upon proposed commercial buildings or their rear yards. As previously noted, the project site lies outside of the 60 dBA CNEL contours of Brown Field.

Significance of Impact

As a noise generator, the project would have a potentially significant noise impact on residential land uses of the approved California Terraces Precise Plan near the northeast project boundary. With the additional project traffic, the 65 dBA noise contour would extend into portions of these future land uses. Similarly, the 65 dBA contour would extend

outside of the "A" Street right of way and into areas to the south which would eventually support residential uses.

As a noise receiver, the project would not be significantly impacted by roadway or aircraft noise from I-805, Palm Avenue, "A" Street, or Brown Field.

Mitigation, Monitoring and Reporting

No project-specific mitigation is necessary for the increased traffic noise related to this project because no development currently exists within the future 65 dBA noise contour along "A" Street. Future development will require discretionary actions which would require environmental review. Future developments along "A" Street would be required to evaluate potential noise impacts from traffic along this roadway (including that of the proposed project) and would be required to mitigate potential noise impacts. Surrounding noise levels would not exceed the 75 CNEL contours. Mitigation would not be required.

G. GEOLOGY/SOILS

The following discussion is based on geotechnical reconnaissance reports prepared by Geosoils, Inc. in September and November of 1989 for the South Palm Precise Plan/Palm IV TM/PRD. In April 1993, Geosoils, Inc. revisited the property to confirm that no substantial changes have occurred on the property which would change the conclusions of their earlier studies. The section areas analyzed in the reports include the area defined by the project site. These reports are contained in Appendix F of the technical appendices.

Existing Conditions

Geologic Units

As indicated on Figure IV-19, two different bedrock units occur on the site: the San Diego Formation and the Otay Formation.

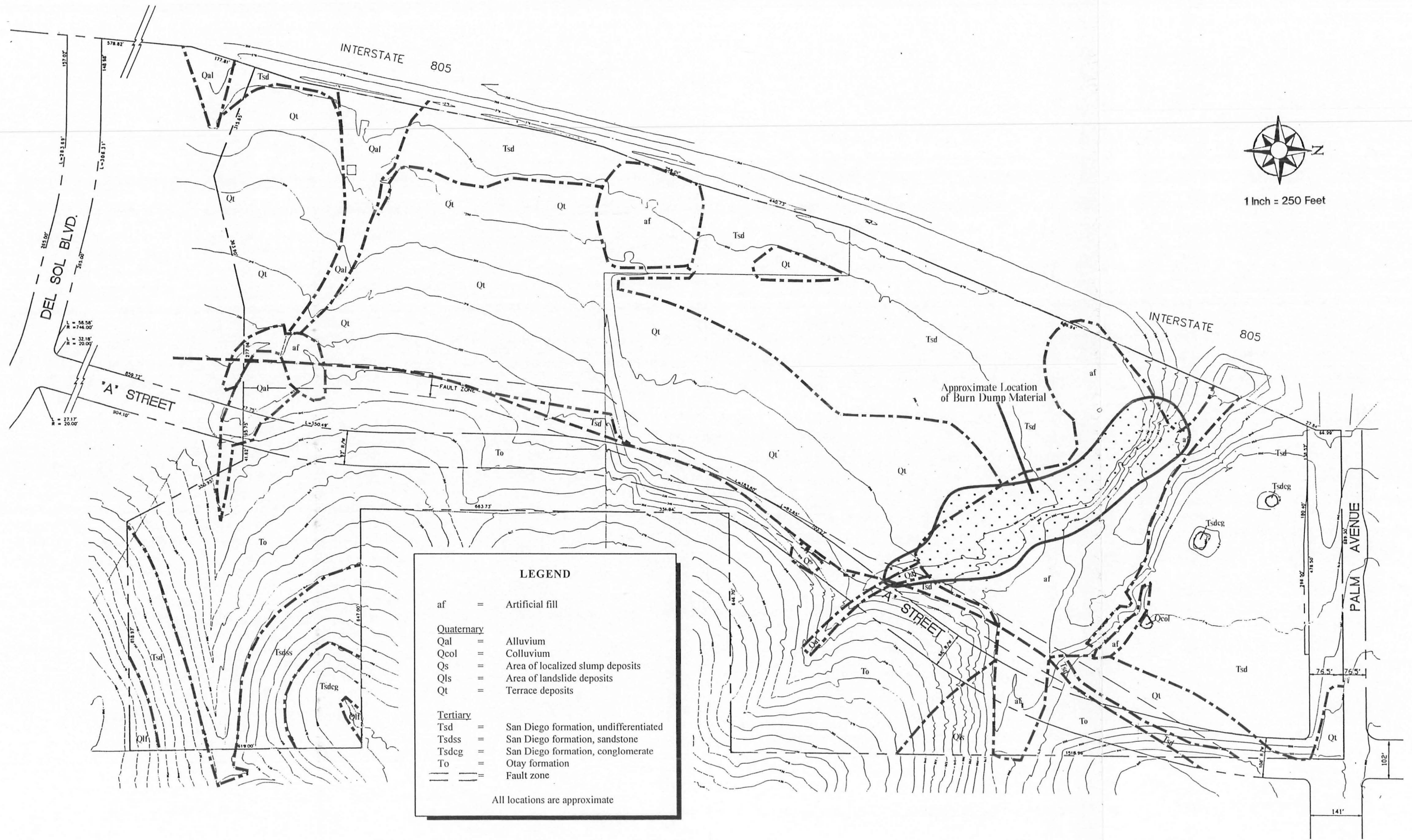
The San Diego Formation is comprised of two members. The conglomeratic unit (Tsdcg) is composed of cobbles derived from the local granitic and metavolcanic basement complex supported by yellowish brown, fine to medium grained sandstone. The lower member of the San Diego Formation (Tsdss) consists dominantly of relatively soft, yellow-brown and gray sandstones with some clay and gravel lenses. These sediments are late-Pliocene ($3 \pm$ million years old) in age and unconformably overlies the Otay Formation except where in fault contact.

Otay Formation bedrock (To) occurs onsite east of the La Nacion Fault on the flanks of the eastern ridges. It typically consists of pale gray to gray, fine silty sandstone with occasional to frequent reddish brown claystone and bentonite clay deposits.

Soils

Quaternary terrace deposits (Qt) consisting of fine to very coarse sandy gravels overlie the flatter portions of the site. These deposits are characterized by loose to medium dense sandy and cobbly gravels with rounded and angular cobbles up to 24 inches in diameter. In general, the thickness of the terrace deposits decreases towards the west and south and the deposits are absent in the westernmost portions of the site where the San Diego Formation and associated topsoils are located.

Fill soils are found over most of the project site. There are a number of small mounds of dump fill (af) of unknown origin, located along the midwestern edge of the site. Artificial fills are also found in the main northwest to southeast trending canyon. In addition, much of the site is blanketed by one to three feet of loose, dry fill.



LEGEND

af = Artificial fill

Quaternary

Qal = Alluvium

Qcol = Colluvium

Qs = Area of localized slump deposits

Qls = Area of landslide deposits

Qt = Terrace deposits

Tertiary

Tsd = San Diego formation, undifferentiated

Tsdss = San Diego formation, sandstone

Tsdcg = San Diego formation, conglomerate

To = Otay formation

--- = Fault zone

All locations are approximate

Remains of a trash dump are present in the north-central portion of the property. Based on the geologic reconnaissance of the site, the approximate limits of all trash dump fill materials are shown in Figure IV-19. Section IV.K discusses the nature and extent of these materials.

Topsoil consisting of expansive clay overlies the area lying generally east of the major northerly trending drainage course at the site. The thickness of the topsoil varies from approximately one to four feet, and generally decreases in depth towards the west.

Relatively thick alluvium/slope wash deposits occur along the bottoms of the significant drainage courses at the site. The alluvial deposits and slope wash exceed 13 feet in thickness at some locations.

Geologic Hazards

The La Nacion Fault is the dominant geologic structure onsite (Figure IV-19). Since no movement has occurred on the fault within the last 11,000 years, it is classified as potentially active by the State of California and the City of San Diego. This ± 20 -foot wide fault zone traverses the site in a north-south orientation and displaces the Otay Formation bedrock against San Diego Formation. Onsite exploration has indicated several secondary shears which are likely associated with the fault zone. No indication or evidence of Holocene fault activity was observed along any exposure of the La Nacion Fault.

The estimated maximum credible magnitude earthquake for the La Nacion Fault is approximately 6.5. Peak ground acceleration from an earthquake of the magnitude could exceed 0.66g with a repeatable high acceleration of 0.43g and a duration that could exceed 20 seconds.

The closest active faults to the project site are the Rose Canyon Fault and Coronado Bank Fault which are 6.5 and 11.5 miles from the project site, respectively. Should the Rose Canyon Fault experience a maximum earthquake, peak ground acceleration at the site could theoretically reach 0.46g. A similar event on the Coronado Bank Fault could result in peak accelerations of 0.29g. It should be noted that the historic seismicity of the Rose Canyon Fault is very low.

One area of landsliding was noted along the southern margin of the principal drainage along the eastern edge of the site. The westernmost extent of this slide area occurs onsite and is depicted on Figure IV-19. West of this slide area, at the terminus of this ridge, an area was noted in the field and on aerial photos which suggested the presence of additional landsliding. Subsequently, during additional investigations, this feature was explored by drilling. No evidence of landsliding was observed in the boring and it was determined that this feature was related to differential erosion along the contact between the San Diego Formation and the underlying Otay Formation.

Issue 1: Are there unstable geologic or soil conditions which would represent a constraint to development of the site or pose future hazards either on or offsite?

Impact

The La Nacion fault zone would not significantly impact the project or represent a constraint to development. As shown on the project's site plan, proposed commercial structures would not lie within the ± 20 -foot width of the fault zone. The distance between the proposed structures and the fault zone meets or exceeds the setback of 25 feet recommended by the project geologist. In addition, the La Nacion Fault has a low seismic potential. Other nearby active faults, the Rose Canyon and Coronado Bank, would more significantly affect the project.

Moderate to intensive ground shaking is considered likely to impact the site from nearby active faults within the next 50 to 100 years. However, the shaking is not anticipated to be any more severe than on any other nearby site, underlain by similar earth materials.

Other seismic related hazards were evaluated on the project site. These hazards included seiche, liquefaction, seismic settlement or consolidation, and the potential for tsunamis. It was determined that the potential for these seismic hazards was negligible and would therefore represent an insignificant impact on the project proposal.

Onsite geological units and soils would represent a potentially significant impact on the project. Highly weathered bedrock units and terrace deposits would potentially constrain project development. Onsite fills are not considered suitable for structural support. The alluvium/slope wash materials are compressible and would require removal and/or recompaction prior to placement of any fills or construction on slope wash or alluvium deposit sites. Onsite topsoil and colluvium would also potentially impact the project in areas of proposed development. The trash dump materials are not suitable for the siting of structures or for reuse as fill within the property. These materials would represent a significant impact on future commercial development in the northern portion of the project site.

Most earth materials encountered during site grading would vary from moderately expansive to highly expansive. Potentially significant impacts would be associated with development on the highly expansive soils.

The project proposes 2:1 cut slopes along the eastern side of primary access road in an area which exhibits potentially unstable geological characteristics. The height of these slope would range from ± 10 to ± 80 feet. The La Nacion Fault extends through the cut slope in the northeastern portion of the project site, creating a potentially unstable geological condition. In addition, bentonite clay beds were encountered within the Otay Formation. These interbeds would potentially impact the project since they are very prone to slippage

if oriented adversely with respect to cut slopes. Potential impacts would also be associated with the landslide area on the eastern edge of the site since the proposed access road and cut slopes are situated near this area.

Significance of Impact

Unstable geologic and soil conditions occur onsite and represent a potentially significant constraint to development. These conditions are associated with the highly weathered bedrock and terrace deposits; poor structural support associated with fills, alluvium/slopewash, topsoil, colluvium, trash dump material, and highly expansive soils encountered onsite; and the potential for the La Nacion Fault Zone, bentonite clay beds, and landslide deposits to create unstable conditions on proposed 2:1 cut slopes.

Mitigation, Monitoring, and Reporting

The following mitigation measures would reduce impacts associated with unstable soil and geologic conditions to below a level of significance:

Mitigation Measure IV.G.1: Prior to issuance of a land development permit, a detailed evaluation of the seismic conditions, undocumented fills, expansive soils, terrace deposits, alluvium/slope wash, colluvium, bentonite clay deposits, trash dump materials, landslide deposits, and bedrock formations shall be submitted to and approved by the City Engineer. The evaluation shall include, but shall not be limited to, an analysis of the following conditions in areas to be graded and developed: gross and surficial slope stability; thickness/extent of fill soils, potential fracture and/or joint patterns which may affect slope stability, site specific rippability characteristics, and site exploration excavations. The study shall provide remedial grading measures to mitigate any unstable soil, bedrock, or seismic conditions. Grading and development plans shall be reviewed and approved by the City Engineer to determine compliance with the remedial grading measures identified in the project-specific geotechnical reports.

Mitigation Measure IV.G.2: Prior to issuance of a Notice of Completion and Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that remedial grading measures have been implemented pursuant to the approved plans.

Mitigation Measure IV.G.3: Prior to issuance of building permits, all project building plans shall be in compliance with seismic design standards of the Uniform Building Code and be approved subject to the satisfaction of the City Engineer.

Issue 2: After grading, will exposed soils allow efficient irrigation of all landscaped areas? Would compliance with the City's fuel management program result in increased erosion?

Impact

Development of the project would require fill depths averaging 30 feet to 55 feet. These materials will be derived from the onsite sandstones, claystones, and conglomerates and will likely vary in texture from sandy loam to clay loam. These types of materials should adequately support suitable landscape vegetation and allow efficient irrigation of all landscaped areas if proper irrigation and soil preparation techniques are utilized.

The proposed landscape plan (Figure III-5) indicates the use of native drought tolerant species that could be supported by the sandy loam and clay loam soils of the project site. However, grading may expose some areas to bentonite, a clay type soil which is impervious to water when compacted. The impervious nature of the bentonite would result in inefficient irrigation of some planted areas if not properly treated. Proper soil preparation methods would need to be employed to guarantee healthy growth and to conserve water.

Significance of Impact

After grading, exposed soils which may contain bentonite which could have a significant impact on efficient irrigation and healthy plant growth.

Mitigation, Monitoring, and Reporting

Implementation of the following mitigation measures would ensure efficient landscape irrigation of all landscaped areas within the project site and reduce impacts to below a level of significance:

Mitigation Measure IV.G.4: Prior to approval of the landscape plan and issuance of a land development permit, the landscape plan shall include the following conditions:

- Those areas found to contain bentonite or compacted soils shall be tilled and proper soil preparation measures (specified by a landscape architect) shall be utilized prior to the planting of any project vegetation.
- Organic material such as peat moss or nitrolized soil amendments shall be mixed with existing soil for use as a backfill planting mixture.

The Planning Department shall confirm that appropriate soil preparation and irrigation measures are proposed to facilitate landscape establishment. A qualified landscape architect shall certify in writing that the soil has been properly prepared in conformance with approved landscape plans, soils report, and specifications. The letter shall be submitted to

the Principal Planner of the Environmental Analysis Section. Building permits shall not be issued until the report is submitted and the measures implemented meet the satisfaction of the Principal Planner of EAS.

Mitigation Measure IV.G.5: Prior to issuance of a Notice of Completion and Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that soil preparation and irrigation techniques have been implemented pursuant to the approved landscape plans.

H. UTILITIES

Existing Conditions

Water

The project site is located within the service area of the City of San Diego Water Utilities Department, one of 24 member agencies of the San Diego County Water Authority (CWA). The CWA receives water from the Colorado River and the California Aqueduct via the Metropolitan Water District (MWD).

At present, the City has a 33-inch and 16-inch transmission water line in the Otay Valley to the north. This system operates on the 490 feet above mean sea level (AMSL) pressure level and is supplied by the South San Diego Reservoir.

A 1990 study, "Water System Analysis of Two Transmission Alternatives for the South San Diego/Otay Mesa Service Area" states that a 17.3 million gallon reservoir is needed to provide water service to development on the Otay Mesa, which includes the subject property. This study will have to be updated to determine what facilities would be necessary to develop the subject property.

Sewer

The project site would receive sewer service from the City of San Diego Water Utilities Department. Capacity is held with the San Diego Metropolitan Sewerage System (Metro) which treats its sewage at the Point Loma Sewage Treatment Plant.

Currently, the site and surrounding area are vacant and there are no existing sewer mains or facilities on the site. The nearest existing sewer line is the 27-inch Otay Valley trunk sewer main located in the Otay River Valley. The Gateway Fair project located north of Palm Avenue was conditioned to construct a secondary main from Palm Avenue to the Otay Valley trunk.

Storm Water Drainage

The project site is presently undeveloped. Seasonal precipitation collects in onsite swales from offsite canyons east of the site. Runoff flows in a westerly direction to four existing drainage facilities in the I-805 corridor. These facilities consist of a 66-inch, 30-inch and two 42-inch drain pipes located along the length of the western boundary.

Onsite drainage occurs primarily through three courses: a major drainage channel in the northern portion, a minor swale in south-central portion, and a larger swale near the southern project boundary. The two southern swales collect runoff from small canyons of

an offsite mesa located east of the project site. The northern drainage channel collects runoff from an onsite swale and offsite canyon east of the site. A buried storm drain extends along this channel, transporting surface drainage from an offsite canyon to a culvert under I-805.

Solid Waste Disposal

Commercial development of the size proposed must contract with private commercial waste hauling companies for waste removal. The City currently operates one active landfill in Miramar. The County operates the Otay landfill, east of the project site. The company contracted to take the trash offsite would take the material to either the City or County landfill. Currently, the City is looking to increase capacity at the Miramar landfill by digging deeper and by diverting items such as green waste (vegetation refuse) and tires to recyclers or other users. A State requirement mandates that by the year 1995, 25% of solid waste be diverted (recycled) and by 2000, 50% be diverted. Per the City of San Diego Waste Management Department, the City is not currently limiting development based on the amount of trash generated by a proposed project.

Issue 1: Would the proposed project result in a need for new systems, or require substantial alterations to existing utilities, including water, sewer, storm water drainage or solid waste disposal?

Impact

Water

The project proposes a 36-inch water line in Palm Avenue, a 12-inch water line in "A" Street running the entire length of the project site and an additional 12-inch water line along the western and southern property lines. Construction of an appropriate onsite water distribution system would service the proposed buildings and landscaping.

Per generation rates used by the City of San Diego Water Utilities Department, the water use demand for the proposed development is estimated to average 350,800 gallons per day (5,000 gallons/net acre/day; net acreage is figured at 0.8 of the gross acreage (87.7)).

As stated earlier, the 1990 Water System Analysis indicates that water system improvements may be necessary to accommodate the proposed project. If the update of the water system study indicates that specific improvements are required, then the project would have to assure that these improvements are made to avoid an impact.

Sewer

Per generation rates used by the City of San Diego Water Utilities Department, estimated sewer generation from the proposed project would average 166,128 gallons/day (80 gallons per capita per day; equivalent population for commercial acreage is 43.7 population per net commercial acre).

The proposed project would include an 18-inch sewer line in Palm Avenue and a 12-inch sewer line in "A" Street that would proceed approximately three-quarters of the length of the site to the furthest south freestanding building adjacent to "A" Street. The buildings on the westerly side of the project site would be sewered by a 12-inch line constructed along the western property line.

Adequate capacity exists to provide sewer service for the project. However, offsite improvements including a secondary trunk from Palm Avenue to the 27-inch Otay Valley trunk sewer would be required if it is not constructed by preceding development (Gateway Fair).

Storm Water Drainage

The proposed project would be developed with onsite drainage facilities and improvements in "A" Street and Palm Avenue necessary to fully drain the area. A complete discussion of hydrology impacts and drainage is contained in Section IV.L of this report.

Solid Waste Disposal

Disposal capacity currently exists at local landfills. Mandatory implementation of the wastestream reduction would help assure that the region will be able to meet future solid waste disposal requirements. In order to assist in the implementation of the wastestream reduction goals, the project would meet trash disposal and recycling goals established by the City of San Diego Municipal Code.

Significance of Impact

Water

The project would have a potentially significant impact on water availability to the site if improvements shown to be needed by the water system update are not implemented.

Sewer

Project implementation would not have a significant impact on sewer service in the area. Adequate capacity exists to provide sewer service to the proposed project. However,

potentially significant impacts would be associated with the construction of offsite sewer improvements. The offsite facilities would be required to connect to existing main sewer lines.

Storm Water Drainage

Project implementation would not have a significant impact on surface drainage in the project area. Existing and proposed drainage facilities would be adequate to accommodate anticipated runoff from the project. In addition, overall storm water runoff on the project site would be reduced from current amounts when offsite residential uses are built-out to the east.

Solid Waste Disposal

Project implementation would not have a significant impact on solid waste disposal. The commercial users would contract with independent providers for trash hauling offsite. The City and County operate landfills that are implementing programs for compliance with State mandates for trash reduction through recycling and diversion. The proposed project would comply with City requirements for onsite trash and recyclable storage areas.

Mitigation, Monitoring, and Reporting

The project proposal includes construction of appropriate onsite water, sewer and drainage facilities to serve the development. Improvements in Palm Avenue and "A" Street are also proposed. Additional offsite improvements are required to bring water and sewer service to the project site. Water availability must also be addressed through updating the previous study for the area.

Water

Mitigation Measure IV.H.1: ~~Prior to issuance of a building permit for the building,~~ ~~Prior to recordation of the Final Map,~~ the developer shall update the "Water System Analysis of Two Transmission Alternatives for the South San Diego/Otay Mesa Service Areas" prepared by Boyle Engineering, dated September 1990, to the satisfaction of the Water Utilities Director. Environmental studies of the offsite facilities needed to serve the project shall be conducted, as appropriate, and the developer shall install or otherwise assure all offsite facilities required to serve this development.

Sewer

Mitigation Measure IV.H.2: ~~Prior to issuance of the a building permit for the first building,~~ ~~Prior to recordation of the Final Map,~~ the developer shall provide a sewer study, satisfactory to the Water Utilities Director, for the sizing of gravity sewer mains and to show that the

existing and proposed mains will provide adequate capacity and have cleansing velocities. Environmental studies of the offsite facilities needed to serve the project shall be conducted, as appropriate, and the developer shall install or otherwise assure all offsite facilities required to serve this development.

Storm Water Drainage

No mitigation measures are required beyond implementation of the drainage improvements proposed as part of the project.

Solid Waste Disposal

No additional mitigation measures are required other than compliance with City codes requiring onsite storage facilities for trash and recycling facilities.

I. PALEONTOLOGY

A paleontological study of the project site was previously conducted for Palm Vistas Estates (PRD Permit No. and EQD No. 85-0825, 1987). The existing conditions information contained in the study is current and the paleontological analysis of the site is applicable to this project. The information contained in this section is summarized from the technical report in Appendix G.

Existing Conditions

The project site is underlain by geologic deposits of the Otay formation of Late Oligocene age (approximately 25 million years old), the San Diego formation of Late Pleistocene age (approximately three million years old), unnamed terrace deposits of Quaternary age (approximately 10,000 to 1.8 million years old) and recent alluvium soil and artificial fill.

No fossils were discovered during the previous field investigations conducted in 1987 and 1991. Paleontological records show no known collection localities onsite. The fact that no fossil outcrops were discovered may have been due to lack of good bedrock exposure due to extensive landfill and grading activities in the northern portion of the site combined with thick vegetative and soil cover on the eastern slopes. Records indicate that Oligocene vertebrate fossils have been collected from the Otay formation approximately six miles north of the project site.

The Otay formation is considered to present high resource potential based on a large number of fossil land vertebrates, especially mammals, found in the Otay formation at EastLake in eastern Chula Vista. Completely unknown until 1985, the fossil sites at EastLake are now considered to be the richest localities in California for early mammals of this time period (approximately 25 million years ago).

The San Diego formation is generally known to contain plentiful, well-preserved remains of fossil marine animals. However, the limited occurrence of this formation onsite presents a low resource potential. In addition, the Quaternary terrace deposits onsite have been extensively graded, making resource recovery unlikely.

Issue 1: Would the proposed development or offsite improvements adversely affect paleontological resources?

Impact

Limitations of past field surveys prevent a precise determination of the potential for significant fossil finds. However, development of the project site could result in impacts to paleontological resources occurring when mass grading operations cut into the potentially fossil-bearing layers of the Otay formations, San Diego formations and Quaternary terrace

deposits. The potential for significant paleontological resources is high in the Otay formation and low in the San Diego formation and Quaternary terrace deposits. The potential resources would be destroyed unless recovered during grading.

Significance of Impact

Grading for project development could result in potentially significant impacts to paleontological resources, specifically in the Otay formation. The measures described below would sufficiently insure the recovery of any resources and mitigate the potential impact to below a level of significance.

Mitigation, Monitoring, and Reporting

Mitigation Measure IV.1.1: ~~Prior to issuance of a land development permit, a paleontological resource recovery program shall be approved by the Planning Director. This program shall consist of the following:~~

- ~~• Prior to grading, the applicant shall present a letter to the Planning Director indicating that a qualified paleontologist has been retained to carry out the resource mitigation.~~
- ~~• A qualified paleontologist shall be present at a pre grading meeting to consult with the grading and excavation contractors.~~
- ~~• A paleontological monitor shall be onsite at all times during the original cutting of previously undisturbed sediments of the Otay formation to inspect cuts for contained fossils. Periodic inspections of cuts involving the San Diego formation and Quaternary terrace deposits shall also be made.~~
- ~~• In the event that well preserved fossils are discovered, the paleontologist shall be allowed to temporarily direct, divert or halt grading to allow recovery of fossil remains in a timely manner.~~
- ~~• Fossil remains collected during this salvage program shall be cleaned, sorted and catalogued, and then (with the owner's permission) deposited in a scientific institution with paleontological collections (such as the San Diego Natural History Museum). Deposits will be subject to a storage fee at the cost of the owner.~~
- ~~• The retained qualified paleontologist shall submit in writing, certification that project grading complied with the approved mitigation measures which reduce paleontological impacts to below a level of significance.~~

A report of findings, even if negative, shall be filed with the City of San Diego Environmental Analysis Section and the San Diego Natural History Museum within six weeks of the completion of grading of the project site. Prior to issuance of a land development permit, the applicant shall provide written verification that a qualified paleontologist and/or paleontological monitor have been retained to implement this monitoring program. Verification shall be in the form of a letter from the project applicant to the Principal Planner of the Environmental Analysis Section (EAS) of the City of San Diego Planning Department. A qualified paleontologist is defined as an individual with a Ph.D. or M.S. degree in paleontology or geology, who is a recognized expert in the application of paleontological procedures and techniques such as screen washing of materials and identification of fossil deposits. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials and who is working under the direction of a qualified paleontologist. All persons involved in the paleontological monitoring shall be approved by EAS prior to any pre-construction meetings.

The qualified paleontologist shall attend any pre-construction meetings to consult with the excavation contractor. The project applicant shall notify EAS staff of any pre-construction meeting dates, and of the start and end of construction. The requirement for paleontological monitoring shall be noted on all grading plans. The paleontologist's duties shall include monitoring, salvaging, preparation of materials for deposit at a scientific institution that houses paleontological collections, and preparation of a report summarizing the results of the monitoring efforts. The duties are defined as follows:

a. Monitoring

The paleontologist or paleontological monitor shall be onsite during the original cutting of previously undisturbed areas of the formations to inspect for well-preserved fossils. The paleontologist shall work with the contractor to determine the monitoring locations and the amount of time necessary to ensure adequate monitoring of the project.

b. Salvaging

In the event that well-preserved fossils are found, the paleontologist shall have the authority to divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely manner. Recovery is anticipated to take from one hour to a maximum of two (2) days. At the time of discovery, the paleontologist shall contact EAS. EAS must concur with the salvaging methods before construction is allowed to resume.

c. Preparation

Fossil remains shall be cleaned, sorted, catalogued, and then deposited in a scientific institution that houses paleontological collections (such as the San Diego Natural History Museum).

d. Monitoring Report

A monitoring report, with appropriate graphics, summarizing the results, analysis and conclusions of the above program shall be prepared and submitted to EAS and the San Diego History Museum within three (3) months following termination of the paleontological monitoring program. Building permits shall not be approved prior to receipt of this report.

J. CULTURAL RESOURCES

A cultural resource investigation was conducted in the project area by Regional Environmental Consultants (RECON) in 1989 and updated in April 1993. RECON conducted this field survey for the South Palm Precise Plan, a previously proposed project. The South Palm Precise Plan consisted of approximately 225 acres; the proposed 87.7-acre project site occupies the northerly portion of the South Palm Precise Plan area. Subsequent to the survey, a significance testing report was prepared by RECON on the South Palm area. In the course of this work, the cultural resource sites found on the subject property were investigated including a prehistoric and suspected historic site. The results and conclusions of the original survey report and subsequent testing reports which are relevant to the Palm Plaza site are summarized in this section. The full reports are contained in Appendix H.

Existing Conditions

The survey identified three prehistoric sites (one of which was previously unrecorded) and one suspected historic site on the Palm Plaza site. None of these sites were considered to be significant cultural resources. A brief discussion of each of these sites is included below.

SDi-7983

A record search by RECON revealed that SDi-7983 was recorded in 1985 by RBR & Associates. A small portion of the site extends into the extreme northeast corner of the project boundaries. SDi-7983 was determined to be part of a complex that includes another previously recorded site (SDi-7984) and several loci along the north slope of a ridge overlooking the Otay River drainage. Surface collection and testing of this site in 1985 revealed a high proportion of scrapers within the tool assemblage. A chopper, projectile point, and 16.0 grams of shell were also recovered from the site. The tools and pieces of debitage were all of local materials. On the basis of these materials, SDi-7983 was interpreted as a prehistoric plant processing location.

The condition of the site at the time of a 1985 survey was very poor and it was not relocated by the 1989 RECON survey. The area has been subjected to severe impact due to constant use as an off-road vehicle track. Most of the ridge has also been severely impacted by grading, burning, and refuse dumping. These activities have modified the surface to the extent that almost no topsoil remains over most of the area and the original landform is indiscernible. Some scattered surface artifacts were noted by RECON, consisting mainly of metavolcanic flakes. Significance testing was not recommended for this site by RECON since the low resource potential of the site had been exhausted.

SDi-7985

This site was originally recorded by L. McCoy in 1967 and was situated near the northwestern portion of the project site. This site has subsequently been destroyed by construction activities centered around the I-805/Palm Avenue interchange. The site was determined to have no research potential. No further work was recommended for this site by RECON.

SDi-11,994

SDi-11,994 was a previously unrecorded prehistoric site found during the recent RECON survey. This site is located on the south-facing slope in the southeastern portion of the project site, and consisted of a sparse lithic scatter (three flakes) covering a 10-square-meter area. Significance testing was conducted for the site. On the basis of this testing, it was concluded that this site does not represent a significant cultural resource under criteria set forth in either the California Environmental Quality Act or the City's Resource Protection Ordinance.

Swine Farm

The RECON survey located the remains of a suspected historic era swine farm situated on the western edge of the site area. This site consists of the remnant of a residence and several outbuildings. Several foundations probably associated with feeding or pen areas for the swine are also present. The remains of three rectangular cisterns and several fence lines were also noted.

The primary residential and ranching locus of this site is defined by a moderate but widespread surface scatter of historic trash. The larger area of the farm property is indicated by the distribution of butchered bone fragments, primarily from cattle. The use of waste from packing houses for swine feed is a historically documented practice. This bone scatter has probably resulted from this practice.

An archival research was conducted to clarify the history of this farmstead. The research concluded that the features and artifacts may be associated with swine farming activity that commenced no more than 40 years ago. Therefore, the swine farm was not considered an historic cultural resource and further investigation of the site was not recommended.

Issue 1: Would the proposed project result in alteration of or the destruction of a prehistoric or historic building, structure, object, or archaeological site?

Impact

The project would impact a portion of the area defined by prehistoric site SDi-7983. Proposed "A" Street and associated cut slopes would encroach upon the western portion of SDi-7983. However, the site is not a significant cultural resource since its low resource potential has been exhausted by severe disturbance.

SDi-11,994, located in an undeveloped portion of the project site, would not be impacted by the project.

Significance of Impact

Since SDi-7983 is not a significant cultural resource, implementation of the proposed project would not result in a significant impact on cultural resources.

Mitigation, Monitoring, and Reporting

No mitigation measures are required.

K. HUMAN HEALTH/PUBLIC SAFETY

Existing Conditions

The following discussion is based the December 23, 1992 letter prepared by the State Department of Toxic Substances Control and the February 5, 1992 letter prepared by the County Department of Public Works. Both letters are contained in Appendix I of this EIR.

The County of San Diego, Department of Public Works, Solid Waste Division records indicate that the northern 50-acre portion of the proposed project was used as an incineration trash dump during the 1950s and early 1960s. The dump was referred to as the South Bay Refuse Disposal Site by the County. The site began receiving refuse in January of 1951 as a dump site for municipal waste and soil. County records indicate that the County took steps in early 1959 to close the subject site due to unsatisfactory conditions maintained by the operator. The site was apparently abandoned in 1963 when a new dump site began operating on the north side of Otay Valley.

In 1978, approximately 850,000 cubic yards of material were exported from the site and used as borrow material for offsite projects. The total volume of ash materials remaining on the property is estimated to be 40,000 cubic yards with approximately 8,100 cubic yards of associated soils underlying the burn dump materials. The remaining material is located in an area of about three acres on the south slope of a 45-foot-deep canyon that traverses the northern part of the project from east to west (Figure IV-19). The ash materials range in depth from surface material to 32 feet and are exposed at the edge of the canyon. In general, the burn dump materials consist of 70% ash with the remaining 30% consisting of soil, rock, cobble, glass and metal fragments, and other debris.

There are currently no active streams or springs within the project site and no groundwater was encountered to a depth of ± 30 feet in test pits or borings conducted by GeoSoils, Inc. in 1989 (Appendix F). The area surrounding the burn dump is predominantly artificial fill with bedrock materials of the San Diego formation to the north and south of the fill.

The following analytical tests were performed on samples of the ash material taken from burn dump:

- Total concentrations of lead and copper;
- Soluble concentrations of lead as measured by the Toxicity Characteristic Leaching Procedure (TCLP) and the Waste Extraction Test (WET);
- Volatile and semi-volatile organic compounds;
- PCBs;
- Total phenols;
- Total cyanides;

- Total concentration of dioxin; and
- Acute aquatic 96-hour LC₅₀ bioassay.

With the exception of WET-soluble lead, the analyses determined that the regulatory threshold limits were not exceeded for the mean concentrations of total lead, TCLP-soluble lead, total copper, soluble copper, and dioxin. The analytical detection limits were not exceeded in testing for volatile and semi-volatile organic compounds, phenol concentrations, cyanide concentrations, and PCBs. Samples of ash material used to perform the 96-hour LC₅₀ bioassay were not determined to be toxic.

The following analytical tests were performed on samples of the associated soil taken from burn dump:

- Total concentrations of inorganic constituents;
- Soluble concentration of lead as measured by the TCLP and WET;
- Total concentration of dioxin; and
- Acute aquatic 96-hour LC₅₀ bioassay.

Given the low expectation of detecting any volatile or semi-volatile organic compounds, phenol, cyanide, or PCBs in the associated soil, no analyses for these compounds in the associated soil was performed. Inorganic constituent compounds and total dioxin concentration were determined not to exceed regulatory threshold limits. The mean TCLP-soluble lead concentration for five samples of associated soil did not exceed the federal regulatory threshold. The mean WET-soluble lead concentration of associated soil samples exceeded the soluble threshold limit concentration by 2.5 mg/l. All tested samples used to perform the 96-hour LC₅₀ aquatic bioassay were not determined to be toxic.

Issue 1: Would the ash material located in the northern portion of the project site create any safety hazard or expose people to a potential health hazard? Would the ash material create a risk of explosion or release of hazardous substances?

Impact

Based upon the information and data analyzed by the Department of Toxic Substances Control, a Non-Hazardous Determination has been issued for the onsite ash material and associated soil. According to the Department, the physical and chemical characteristics of the ash material and associated soil do not represent a significant hazard to human health and safety. In addition, as approved by the County of San Diego, the project would remove all onsite ash materials and associated soils for disposal at the Otay Landfill.

It is not anticipated that significant lead migration has occurred via the soil into groundwater. No subsurface water was encountered in tests conducted at the site. The lead present in onsite soil is also expected to have limited mobility given its Ph level of between

7.3 and 7.9. Even though the WET-soluble levels recorded on the site exceed the soluble threshold limit, studies have shown that with soil Ph levels between 7 and 9, lead is readily absorbed onto clay and other soil surfaces, forming insoluble complexes.

Significance of Impact

The ash material and other deposits associated with a former landfill located on the property have been determined to be non-hazardous. Therefore, they pose no significant public health and safety impacts.

Mitigation, Monitoring, and Reporting

No mitigation measures are required.

L. HYDROLOGY/WATER QUALITY

The following section is based upon the hydrologic/hydraulic analysis prepared by Dunaway Associates in April, 1993 (Appendix J). All stormwater runoff volumes in the analysis assume the rainfall intensities of a 100-year storm.

Existing Conditions

Surface drainage throughout the property consists of runoff from seasonal precipitation which collects in onsite swales. Runoff flows in a westerly direction to four existing drainage facilities in the I-805 corridor. These facilities consist of a 66-inch, 30-inch and two 42-inch drain pipes located along the western boundary.

Onsite drainage occurs primarily through three courses: a major drainage channel in the northern portion, a minor swale in south-central portion, and a larger swale near the southern project boundary. The two southern swales collect runoff from small canyons of a mesa located east of the project site. The northern drainage channel collects runoff from an onsite swale and offsite canyon east of the site. A buried storm drain extends along this channel, transporting surface drainage from an offsite canyon to a culvert beneath I-805.

Portions of the project site are located in the Otay and Tijuana River Basins. Drainage from approximately 52 acres of the project site ultimately flows to the Otay River to the north, while the remaining 8 acres ultimately flows south to the Tijuana River. The Otay River Basin is approximately 18,160 acres. The Tijuana River Basin contains over 1,090,000 acres, of which 291,200 acres are located in the United States. Thus, the project site represents a very small proportion of both river basins.

According to the 1989 Geotechnical Study prepared for the site, active streams or springs do not occur onsite (Appendix F). Groundwater was not encountered in any of the test pits or borings. Because of the current drought conditions, local accumulations of groundwater might be anticipated during and after future rainfall seasons, especially along alluvium/bedrock or terrace deposit/bedrock contacts.

The project site is situated within two drainage sub-basins, identified as basins 5 and 6 (Figure IV-20). Within both basins, large portions of vegetation have been disturbed and/or denuded due to unauthorized off-road vehicle activity. This long term soil compaction and lack of native vegetation causes a highly impermeable surface which results in an increased rate of stormwater runoff and sediment yield.

Surface runoff of basins 5 and 6 is primarily collected by the four drainage facilities located beneath I-805. In determining the estimated runoff generated by the project site, a runoff coefficient of 0.68 was used for portions of the site within basin 5 and 0.84 for portions within basin 6. A higher runoff coefficient corresponds to increasing amounts impermeable

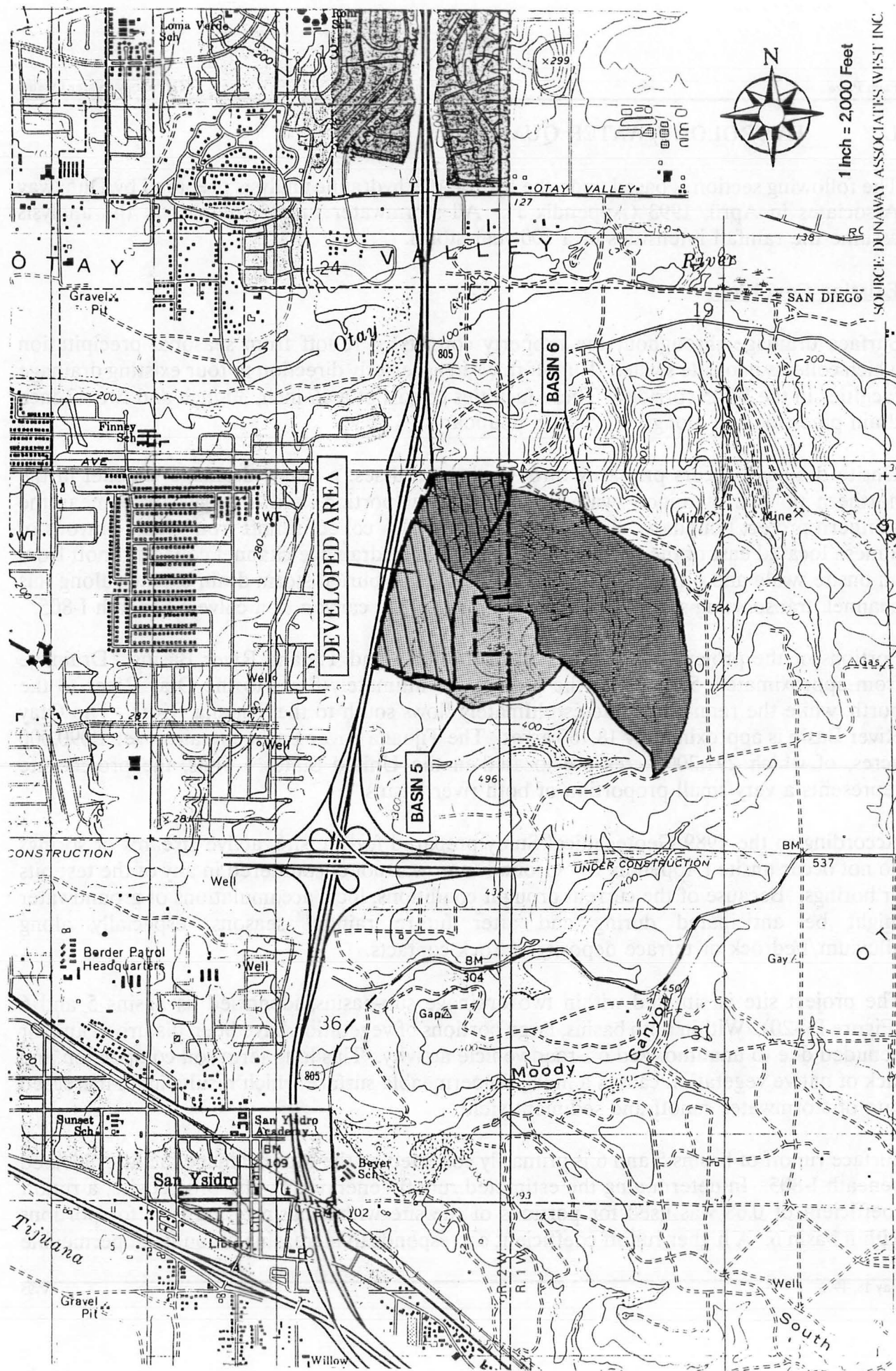


Figure IV-20

Project Area Drainage Sub-basins

surfaces and surface runoff. Using these coefficients, the existing project site generates approximately 148.5 cubic feet per second (CFS) of stormwater runoff. Although Table 2 of the San Diego Drainage Design Manual lists undeveloped land as having a runoff coefficient of 0.45, the foregoing coefficients were used to generate conservative runoff amounts which drain through the site.

Table IV-11 portrays the existing runoff quantities at the discharge points on the western boundary. The drainage capacity of existing offsite facilities is more than adequate to service existing drainage conditions of the project area. Basins 5 and 6, which encompass the project site, generate approximately 525.2 CFS. The existing drainage facilities have an overall drainage capacity of 1366 CFS; an existing surplus capacity of 160%.

TABLE IV-11
Summary of Surface Runoff¹

	Existing Conditions	Existing Plus Project	Project Plus Build-out ⁴
Onsite ²	148.5 CFS	172.1 CFS	172.1 CFS
Offsite ³	<u>376.7 CFS</u>	<u>376.7 CFS</u>	<u>225.0 CFS</u>
Total	525.2 CFS	548.8 CFS	397.1 CFS

- (1) Assuming 100-year storm intensity.
- (2) Area west of "A" Street.
- (3) Includes area offsite in basins 5 and 6 as well as portion of site east of "A" Street.
- (4) Assumes offsite build-out of California Terraces.

CFS = Cubic Feet per second.

Issue 1: Would the proposed project result in changes in absorption rates, drainage, the rate and amount of surface runoff, or in the amount of surface water in any body of water?

Impact

The increase in impermeable surface associated with project development would result in larger amounts of surface runoff. According to the San Diego Drainage Design Manual, a runoff coefficient of 0.85 is considered to be appropriate for commercial development. With project implementation, this higher coefficient would result in approximately 172.1 CFS of

onsite stormwater generation or an increase of 23.5 CFS over that which currently is generated from the site. When added to the existing offsite runoff, approximately 548.8 CFS would be discharged into existing drainage facilities (Table IV-11). If single-family residential uses were developed onsite pursuant to existing zoning, the generation of onsite runoff would be less with approximately 111.7 CFS. The increase in runoff volume associated with proposed commercial development is negligible when considering the surplus capacity of the offsite drainage facilities.

The addition of project runoff to existing offsite runoff would not result in a significant impact on the existing drainage system. As shown in the proposed drainage plan (Figure IV-21), four existing drainage facilities would serve project runoff, designated as design points 18, 34, 45, and 56. Table IV-12 portrays that under existing plus project conditions, a substantial surplus capacity would remain in each existing offsite drainage facility. The proposed storm drain system has been designed under worse-case conditions, assuming that areas east of the site remain undeveloped.

TABLE IV-12
Project Impacts on Existing Drainage Facilities

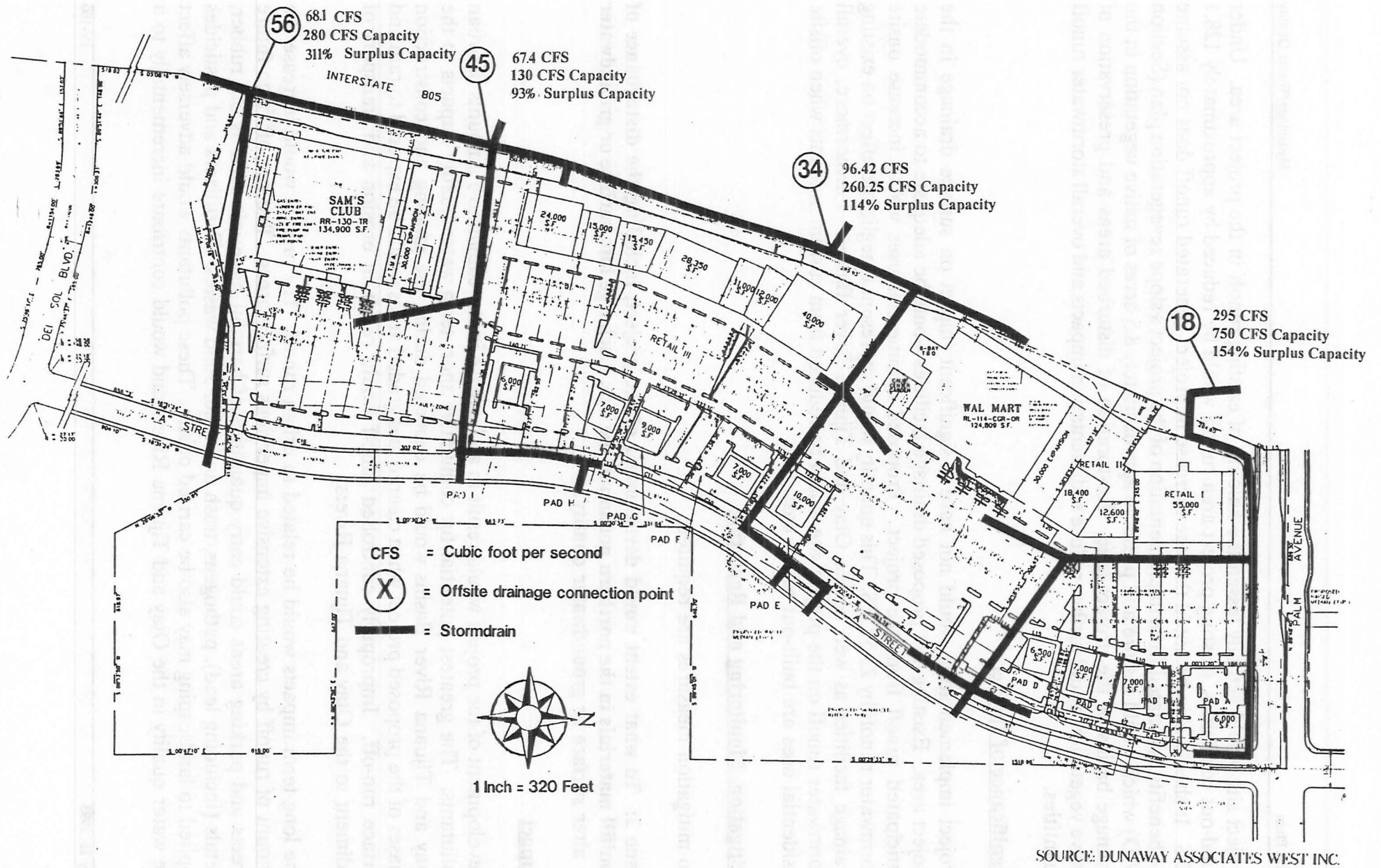
Design Point ²	Storm Drain Diameter	Capacity	Total Incoming Cubic Feet per Second ¹	Surplus Capacity
18	66"	750.00 CFS	318.25 CFS	135%
34	42"	206.25 CFS	102.38 CFS	101%
45	30"	130.00 CFS	61.02 CFS	113%
56	42"	280.00 CFS	65.72 CFS	326%

(1) Assumes existing plus project conditions.

(2) See Figure IV-21.

It should be noted that the residential development of California Terraces is proposed for areas east of the project site. When this development is built-out, total runoff collected onsite would be reduced to approximately 397.1 CFS (see Table IV-11). This reduction would occur since the residential uses would reduce impermeable surfaces in offsite areas.

With respect to runoff quantities, project impacts on the Otay and Tijuana Rivers would be negligible. The developed area of the project site would represent approximately 52.7 acres of the Otay River Basin and 7.6 acres of the Tijuana River Basin. As previously noted, the project would increase the quantity of onsite stormwater runoff by 23.5 CFS. Since the project represents a very small proportion of each river basin, the increase in stormwater runoff would be insignificant. In addition, development of residential uses east of the



project site would actually lessen the amount of existing runoff in the project area. Under build-out conditions, existing project area runoff would be reduced by approximately 128.1 CFS. It should also be noted that the increase in project generated runoff does not assume the benefits associated from implementation of the project's slope revegetation plan (Section IV.D) which would restore and preserve approximately 8.5 acres of native vegetation in the drainage basins of the project area. Restoration of disturbed areas and preservation of native vegetation would further reduce sedimentation impacts and overall stormwater runoff quantities.

Significance of Impact

Project implementation would not have a significant impact on surface drainage in the project area. Existing and proposed drainage facilities would be adequate to accommodate anticipated runoff from the project. Proposed commercial uses would increase onsite stormwater runoff by 23.5 CFS. This quantity would represent a negligible effect on existing drainage facilities as well as the Otay and Tijuana River Basins. Furthermore, overall stormwater runoff on the project site would be reduced from current amounts when offsite residential uses are built-out to the east.

Mitigation, Monitoring and Reporting

No mitigation measures are required.

Issue 2: To what extent would development of the project, including the disturbance of landfill materials in the northern portion of the site, discharge into surface or groundwater or alter surface or groundwater quality?

Impact

Development of the project would result in an increase in the cumulative amounts of urban pollutants. The greatest potential for cumulative short-term water quality impacts to the Otay and Tijuana River Basins would be expected during the grading and construction phases of the proposed project when cleared and graded areas would be exposed to rain and surface run-off. Improperly controlled runoff would result in erosion and transport of sediment to the Otay and Tijuana Rivers.

The long-term impacts would be related to urban runoff. The project would increase the amount of runoff by creating extensive impervious surface areas. The run-off from future streets and parking areas could carry quantities of harmful materials such as oil, rubber, metals (including lead), pathogens, trash and other solid wastes. Fertilizers and pesticides applied to landscaping may also be carried offsite. These pollutants would adversely affect the water quality in the Otay and Tijuana Rivers and would contribute incrementally to a

cumulative increase in the amount and concentrations of urban pollutants entering these water bodies.

Potentially significant water quality impacts are ~~currently not~~ associated with the inactive onsite trash dump since the ash material and other deposits associated with a former landfill have been determined to be non-hazardous (see Section IV.G). ~~Although groundwater was not encountered onsite, lead pollutants from the trash dump have the potential to be collected by surface runoff. Prior to project construction, a work plan would be implemented to properly remove landfill material and lead pollutants in particular. The workplan would be reviewed and approved by proper authorities to ensure that the potential for lead pollutants to enter drainage courses is minimized during removal. Adherence to the workplan would reduce the existing water quality impacts of the dump to below a level of significance.~~

Significance of Impact

Urban runoff from the future uses of the site would have an adverse cumulative impact on the water quality of the Otay and Tijuana Rivers. ~~However, existing water quality impacts associated with trash dump pollutants would be eliminated with implementation of the Public Safety mitigation measures specified in Section IV.K.~~

Mitigation, Monitoring and Reporting

The City of San Diego has developed standards for Urban Stormwater Management Plans that comply with the 1987 amendments to the Federal Clean Water Act, administered by the Environmental Protection Agency (EPA). These standards require applicants to identify and implement Best Management Practices (BMP's) to address urban runoff pollution impacts.

Municipalities in the San Diego region, including the City of San Diego, must also comply with the California State Water Resources Control Board (CSWRCB) NPDES Permit No. CA 01085757 which consists of wastewater discharge requirements for storm water and urban runoff. To comply with Permit No. CA 0108757, the City of San Diego must complete a BMP Program for Stormwater Pollution Control. The BMP will detail water quality control measures to be implemented on a City-wide basis.

The following mitigation measure shall be incorporated as a condition of the PCD permit. Implementation of this measure would reduce the short-term water quality impacts. Over the long-term, implementation of the City-wide BMP would mitigate the project's contribution to the cumulative water quality impacts.

To reduce water quality impacts from urban runoff, the project applicant shall implement the following measure:

Mitigation Measure IV.L.1: Prior to issuance of a land development permit, the applicant shall develop a program that would manage and control nonpoint source pollution. The applicant shall identify and implement a plan in accordance with design criteria established by the City of San Diego and for the required NPDES permit. The EAS shall review the plan to ensure the measures have been provided.

To reduce short-term water quality impacts, pollution control devices shall be installed to intercept flow before discharge into the drainage system to the extent determined feasible by the City Engineer.

During construction temporary desilting basins shall be utilized to keep sediment from the graded pads from entering the storm drain system. The collected silt shall be removed from these inlet structures after each major rainfall. Sandbagging along street and utility trenches shall be used for temporary erosion control prior to completion of final improvements.

Mitigation Measure IV.L.2: Prior to issuance of a land development permit, the City Engineer shall review the grading plan to ensure that erosion control measures are provided. The project applicant shall comply with the National Pollutant Discharge Elimination System requirements by filing a Notice of Intent with the State of California Water Resources Control Board (SWRCB), and by implementing a Storm Water Pollution Prevention Plan satisfactory to the SWRCB.

Mitigation Measure IV.L.3: Prior to issuance of a Certificate of Occupancy and Final Inspection, the Inspection Services Division of the Building Inspection Department shall conduct a final inspection of the site to confirm that water pollution control devices have been installed pursuant to the approved building plans.

V. GROWTH INDUCEMENT

The growth-inducing analysis addresses two issues, as defined in Section 15126 (g) of the CEQA Guidelines. The first is the potential for the project to "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The second is the potential to "encourage and facilitate other activities that could significantly effect the environment, either individually or cumulatively." This second issue involves the potential for the project to induce further growth by the extension or expansion of existing services, utilities or infrastructure.

The proposed project is a commercial center which would contribute incrementally to the local and regional general economic activity. However, the proposed project would provide goods and services to the existing and planned residential communities within the project vicinity and not attract residents from a broader region.

The project would be located in Phase I of the development phasing program for the Otay Mesa Community Plan which is intended to be the first area of Otay Mesa to develop. As a result, development of this project would be consistent with the phasing goals of the community plan.

Although the site is located in the Phase I development area, implementation of the proposed project would result in construction of offsite infrastructure which would benefit surrounding land. The project would construct an offsite portion of "A" Street and Del Sol Boulevard through undeveloped land to the south. If development of Gateway Fair does not extend the sewer and water lines to the project area, the project would assume responsibility for extending the lines from Otay Valley which would pass through the Gateway Fair property to reach the project site. The project may also be required to construct other water system improvements to obtain water service. Finally, the project would construct the first segment of Palm Avenue, east of I-805, which would benefit future development of Gateway Fair and California Terraces.

Although the project would construct offsite infrastructure which would benefit surrounding land, the influence of these improvements on development of these properties would not be considered significant. Gateway Fair, the property to the north, has already been approved for commercial development. Similarly, development plans are in process for the land within California Terraces, to the east of the project. Factors beyond the availability of the offsite improvements related to the proposed project, including economic and Brown Field building moratoriums, are controlling development of these areas.

Thus, it is concluded that the project would not result in a significant growth-inducing impact.

VI. CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines requires that cumulative impacts be addressed when they are significant. The CEQA Guidelines define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (Section 15355). This section provides a summary of the cumulative impacts addressed in the environmental analysis contained in Section IV.

A. TRAFFIC

The project would have a significant cumulative impact under the Interim Build-out Plus Project scenario, which would consist of project traffic and traffic associated with the approved California Terraces development. The southbound I-805 ramp terminal under this scenario would operate at an unacceptable LOS F.

Under the Build-out Plus Project conditions, the project would have significant cumulative traffic impacts on the Palm Avenue/"A" Street intersection and the I-805/Palm Avenue ramp terminals. Using the number of lanes assumed by the San Diego travel forecasts, the intersection operation of Palm Avenue/"A" Street was analyzed and found to be significantly impacted by project traffic. The intersection would operate at LOS D in the AM peak hour and LOS E during the PM peak hour. With ultimate lane assumptions at the I-805/Palm Avenue interchange, the ramp terminals would operate at LOS D in the AM and PM peak hours.

B. BIOLOGY

The loss of biological resources found on the project would be cumulatively significant. Further depletion of onsite and offsite Diegan coastal sage scrub is considered a significant cumulative impact. In addition to diminishing this sensitive vegetation community, the loss of Diegan coastal sage scrub would have a significant cumulative impact on the coastal California gnatcatcher which is listed as a Federal threatened species. Because of their rarity and limited distribution, impacts to maritime succulent scrub and the sensitive species which inhabit this vegetation (cactus wren, snake cholla, San Diego bur-sage, coast barrel cactus, and cliff spurge) would be considered cumulatively significant. The loss of wetland habitat associated with the project would be cumulatively significant. Finally, the impact on foraging habitat and prey species in the southern non-native grassland would be cumulatively significant. The loss of this habitat could potentially affect local populations of raptors and sensitive species which potentially occur in this habitat.

C. AIR QUALITY

Implementation of the project would have a cumulative impact on air quality in the San Diego Air Basin. As discussed in Section IV.C, the increase in traffic on Palm Avenue and "A" Street resulting from the proposed use would drop the level of service on these roadways to unacceptable levels of service. As a result, air emissions would increase over that which would occur under free-flowing traffic conditions. This would result in a significant cumulative impact.

VII. SUMMARY OF ENVIRONMENTAL CONSEQUENCES

A. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Section 15126 (e) of the CEQA Guidelines defines this section of the analysis as a discussion of the cumulative and long-term effects of the proposed project which adversely effect the environment, focusing on impacts which "narrow the range of beneficial uses" or "pose long-term risks to health or safety." This section explains why the proposed project is "believed by the sponsor to be justified now, rather than reserving an option for further alternatives" (Section 15126 (e) of the CEQA Guidelines).

In terms of long-term productivity, the site possesses two major qualities: biology and aesthetics. As discussed in Section IV.B, the slopes in the eastern portion of the site are considered important landforms in the project vicinity. Although disturbed by offroad activities, these slopes are a dominant feature in the area and are considered an aesthetic resource. These slopes are also important in that they are covered by vegetation which supports sensitive plant and animals species. Most notably, the slopes are habitat for the coastal California gnatcatcher which is listed as a Federally threatened species.

The short-term use of the property as a commercial center would significantly affect the long-term productivity of the site. Overall, the project would reduce the aesthetic character of the site by converting the land from an undeveloped to a developed condition. More specifically, the proposed grading of "A" Street would cut into the easterly slope creating a manufactured bank with a maximum height of 81 feet along the entire east side of the property. As concluded in Section IV.B, this manufactured bank would have a significant impact on the landform. Although the proposed revegetation would reduce the visual impact of the slope, the proposed grading would significantly impact the overall aesthetic value of the property.

With respect to biology, the project would diminish but not significantly impact the long-term biological value of the property. Although sensitive plant communities and wildlife would be eliminated, the project includes mitigation measures which would compensate for the loss of biological resources. The manufactured slope along "A" Street would be revegetated with Diegan coastal sage scrub and provide habitat for the coastal California gnatcatcher. Areas denuded by offroad activities within natural areas to be placed in open space would be replanted to enhance the overall wildlife value of these areas. The proposed open space areas as well as much of the revegetated manufactured slope would be adjacent to planned open space areas to the east within the California Terraces project.

In addition to the short-term impacts related to aesthetics and biology, implementation of the project would also affect the local environment by increasing noise levels on local roadways, contributing to regional air quality problems and generating additional urban runoff. As discussed in Section IV.F, the increase in traffic on "A" Street would raise noise levels in surrounding residential areas to levels which exceed that which is considered normally acceptable. The increased traffic volume would also increase the amount of air emissions which would be related to development of the site; although, as discussed in Section IV.E, most of the trips would likely occur somewhere in the San Diego Air Basin since they are shopping trips. Finally, petroleum products as well as debris would be picked up from the proposed parking lots in surface runoff. Although urban runoff control measures would be carried out, some amount of water quality degradation would be unavoidable.

The applicant has proposed to use this property for the proposed use at this time for several reasons. First, the subject site has been determined to be the most suitable site for the proposed Wal-Mart and Sam's Club stores based on the anticipated service area within the City and its location adjacent to a freeway. Furthermore, the site is located at the gateway to the first development phase of the Otay Mesa Community Plan. As such, the community plan anticipates that this property would be one of the first developments to occur. Thus, the applicant considers it appropriate to implement the proposed project now.

B. ANY SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Section 15126 (f) of the CEQA Guidelines requires the evaluation of significant changes to the site that would be irreversible should the proposed action be implemented. Implementation of the proposed project would commit the site to retail commercial use. As discussed in detail in Section IV, the proposed project would result in significant irreversible impacts related to landforms (Section IV.B), cumulative traffic (Section IV.C) and cumulative air quality (Section IV.E). Although other significant impacts would occur, mitigation measures are available to reduce the impact to below a level of significance, thereby, avoiding significant irreversible changes with respect to biology, noise, geology, paleontology, human health/public safety and hydrology/water quality.

VIII. EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of San Diego reviewed the project against the potential environmental issues contained in the Initial Study Checklist. Based on the results of this evaluation the potentially significant environmental impacts were identified and are addressed in this document. However, the following potential environmental impacts on the Checklist were considered to not be significant for the reasons stated below.

A. LIGHT, GLARE AND SHADING

The land adjacent to the subject property is vacant at the present time. Future residential areas to the east would be separated from the proposed project vertically and horizontally and thus would not be affected. Parking and security lighting in the vicinity of the future residential development at the south end of the project would be shielded and directed away from residential areas, thus, avoiding a significant lighting impact. The proposed buildings would not be of sufficient height to shade adjacent property.

B. NATURAL RESOURCES

The proposed project would not result in an excessive consumption of natural resources.

C. RECREATION RESOURCES

The site does not possess recreational value and is not designated for recreational use. No planned recreation areas would be adjacent to the project. Therefore, implementation of the project would not impact recreational resources.

D. POPULATION

As a commercial development, the project would serve the existing and proposed residents of the area and would not influence the population distribution in the area. No change in the demand for or type of housing would occur with the project.

E. HOUSING

The change to commercial use of the proposed project would decrease the potential housing stock in the Otay Mesa area. However, as discussed in Section IV.A, the loss of some 252 units is not considered significant.

F. PUBLIC SERVICES

As a commercial center, the project would not impact the local schools or parks. The center would also not create any major problems for local police or fire protection services. Therefore, no significant public service impacts would occur with the project.

G. ENERGY

No excessive amounts of fuel or energy would be consumed by the project. As discussed in air quality, the majority of the automobile trips associated with the project are related to shopping trips which would occur in the area whether or not this site is developed as a commercial center. In addition, the energy consumed by the operation of the center would not be significant.

H. WATER CONSERVATION

Commercial uses are not considered high water volume users. Landscaping will use water; however, drought-tolerant species will be used wherever possible and irrigation systems would incorporate water conserving features. The manufactured slope east of "A" Street would be planted with native vegetation which is considered drought tolerant. Therefore, the project would not have a significant impact on water supply.

IX. ALTERNATIVES

Section 15126 (d) of the State CEQA Guidelines requires the discussion of "a range of reasonable alternatives to a project or to the location of a project, which could feasibly attain the basic objectives of the project." The discussion is intended to "focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede, to some degree, the attainment of the project objectives, or would be more costly." Section 15126 (d) (5) further states that "the range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice."

The alternatives discussed in this section are intended to eliminate or reduce the environmental impacts which the proposed project cannot mitigate to below a level of significance, namely those associated with land use, landform alteration, traffic, biological resources, and cumulative air quality. The alternatives which are addressed include a modified design for "A" Street and an offsite location. The alternative of developing the site under the present residential land use designation is discussed along with the CEQA-mandated "No Project" alternative to identify the consequences of leaving the project site in its present condition.

A. NO PROJECT

The No Project alternative assumes that the site would remain in its present state and no further development would take place. The significant, unmitigated impacts associated with the proposed project under the No Project alternative would result in the following:

Land Use

The No Project alternative would avoid the project impacts to the environmental goals of the Otay Mesa Community Plan related to landform alteration. In addition, this alternative would avoid the conflicts with the City's Resource Protection Ordinance.

Landform Alteration

The No Project alternative would eliminate the significant landform impact by eliminating the proposed grading. However, it should be noted that "A" Street would likely be built with or without the project to link Palm Avenue and Del Sol Boulevard. As the landform impact of the project would primarily occur as a result of road construction and the alignment of this roadway through the site is limited, the No Project alternative may not ultimately avoid the landform impacts of the project.

Traffic

Traffic and circulation impacts would be avoided by the No Project alternative. With this alternative, the project site would not generate any traffic.

Biological Resources

Project impacts on biological resources would not occur. The "No Project" alternative would retain the sensitive resources identified onsite; however, further degradation of resources would be anticipated from the unauthorized offroad vehicle activity. In addition, as with the landform impact, future construction of "A" Street may impact adjacent biological resources with or without the proposed project.

Air Quality

The No Project alternative would have no impacts to the air quality of the area. Impacts to air quality resulting from activities associated with the temporary construction phases of project implementation would be avoided. The impacts from project traffic would also be avoided.

Conclusion

While the No Project alternative would eliminate the project's significant, unmitigable impacts to a level of insignificance, this alternative would not fulfill the project objective of developing commercial uses at the site. The No Project alternative has been rejected by the project applicant because it would deny reasonable use of the land and would be economically infeasible as the landowner would continue to pay property taxes on the project without providing for offsetting revenues.

In addition, this alternative would not prevent the continued degradation of the easterly slopes where offroad vehicle activity is expected to continue to diminish the visual character of the property and accelerate erosion impacts.

B. DEVELOPMENT UNDER EXISTING LAND USE DESIGNATION

This alternative would involve development of the site with single-family residences as currently allowed under the Otay Mesa Community Plan. The project site was included in the South Palm Precise Plan which proposed to develop residential uses on the property. The Otay Mesa Community Plan allows residential uses onsite at a density of 0-5 dwelling units per acre. Based on the initial development plans proposed in the South Palm Precise Plan, the project site it is estimated that the project could support up to 252 single-family dwelling units. It is assumed that the development footprint is dictated by site topography and would occupy the same area as the proposed project. Similarly, access to the site would

be reflect that of the proposed project. However, the residential development plan could accommodate a more westerly alignment of "A" Street than the proposed commercial use.

Significant, unmitigated impacts associated with the proposed project under this alternative would result in the following:

Land Use

Residential development of the property would not avoid the impacts on the environmental goals of the community plan relative to landform alteration nor would it avoid the conflicts with the City's Resource Protection Ordinance. With respect to landform alteration, construction of "A" Street would be required to serve residential development and as discussed in the Modified "A" Street alternative, the alignment of this road is relatively fixed. Thus, no substantial reduction in the landform alteration impact would occur with residential use of the property. Similarly, the conflict with the Resource Protection Ordinance is largely related to construction of "A" Street. However, the residential project could be designed to move the roadway out of the sensitive biological lands and steep slopes in the southern portion of the property and likely be designed to avoid the two wetland areas.

Landform Alteration

As discussed in Land Use, this alternative would likely not reduce the landform impacts to below a level of significance.

Traffic

The residential traffic volumes of this alternative would reduce the traffic impacts associated with the project. This alternative would generate approximately 2,520 ADT, whereas the proposed project would generate 43,200 driveway trips and 30,200 cumulative trips with the commercial uses. Thus, significant traffic impacts would not occur under this alternative.

Biological Resources

This alternative would likely lessen but not avoid the biology impacts of the proposed project. As discussed under Land Use, residential development may provide greater site planning flexibility which would allow for the realignment of the southern portion of "A" Street away from native vegetation. Additionally, the two wetland areas could be avoided. As any loss of Diegan coastal sage scrub and maritime succulent scrub is considered significant, this alternative would not avoid significant biological impacts and would require some combination of on and offsite mitigation program similar to the proposed project.

Air Quality

This alternative would avoid significant air quality impacts. The reduction in project traffic with residential development would translate into reduced direct air emissions related to the project. Furthermore, it would avoid the conflict with the Revised Regional Air Quality Strategy which is designed to meet, or at least move closer to, State and Federal emission standards for the San Diego Air Basin.

Conclusion

The residential development alternative would avoid the traffic and air quality impacts of the proposed project. In addition, this alternative would likely reduce the land use, landform and biology impacts by allowing the alignment of "A" Street to be moved partially out of the sensitive slope and allowing for preservation of the wetland areas.

The applicant has rejected this alternative because it would not meet the basic objective of the project which is to develop a commercial center.

C. MODIFIED "A" STREET ALTERNATIVE

The goal of this alternative would be to move the alignment of "A" Street as far west as possible in order to reduce its impact on the landform and associated native vegetation along the eastern boundary of the site. The degree to which "A" Street can be moved in a westerly direction is limited by several roadway and site design parameters.

First, the road must be able to carry the projected traffic volumes. As discussed in Section IV.C Traffic, ~~the northerly portion "A" Street must be a four-lane Major Street, while the southern portion is required to be a four-lane Collector Street.~~ The City of San Diego street design standards require that the curve radius not exceed 1,100 feet and 1,900 feet for Major and Collector Streets, respectively, although a smaller curve radius may be allowed when the curves are banked (super elevated). This minimum curve radius standard substantially limits the ability to curve the road away from the sensitive slopes in the southern portion of the property.

In addition to the constraints posed by the minimum curve radius standards, the northerly terminus of "A" Street at Palm Avenue has been fixed by previous decisions made on its location during the planning of development Gateway Fair, to the north, and California Terraces, to the east. Consequently, the road cannot be moved further west at the northerly end. This fact, in combination with the minimum curve radius constraints, makes it difficult to move the road substantially further away from the sensitive lands.

The design requirements of the project also make it difficult to significantly modify the alignment of the road. As discussed earlier, the La Nacion fault passes through the property

along the general alignment of the "A" Street. If "A" Street were to be moved significantly west, commercial development would have been located on the east side of the road. Due to the large area covered by the proposed stores, it would be extremely difficult to be able to place the development along the eastern side of the property and avoid placement of any buildings over the La Nacion fault line.

With respect to the significant, unmitigated impacts associated with the proposed project, this alternative would result in the following:

Land Use

Due to design constraints, the modification of the alignment of "A" Street would not avoid the impacts on the environmental goals of the community plan relative to landform alteration nor would it avoid the conflicts with the City's Resource Protection Ordinance. With respect to landform alteration, a modified alignment of "A" Street would likely lessen but not avoid significant landform alteration. Similarly, the conflict with the Resource Protection Ordinance is largely related to construction of "A" Street and may be lessened but not avoided.

Landform Alteration

As discussed in Land Use, this alternative would likely not reduce the landform impacts to below a level of significance.

Traffic

As no change in the amount of trips generated by this alternative, the traffic impacts would remain significant and unmitigable.

Biological Resources

This alternative would likely lessen but not avoid the biology impacts of the proposed project. As discussed under Land Use, realignment of "A" Street may reduce but not avoid impacts to the native vegetation on the eastern slopes. Additionally, the mulefat scrub area on the southern property line could be avoided; the isolated seasonal wetland would still be lost. As any loss of Diegan sage scrub, wetland or maritime succulent scrub is considered would, at a minimum be cumulatively significant, this alternative would not avoid significant biological impacts and would require some combination of on and offsite mitigation program similar to the proposed project.

Air Quality

The air quality impacts of this alternative would be the same as the proposed project as trip generation would be unchanged by the realignment of "A" Street.

Conclusion

This alternative may reduce but not eliminate the significant, unmitigated land use, landform and biology impacts related to the proposed project. However, the impacts on traffic and air quality would remain the same.

The applicant has rejected this alternative because it significantly impacts the opportunity to locate a large commercial building at the southern end of the property. The presence of the La Nacion fault severely restricts the land area available which would be available east of a realigned "A" Street.

D. OFFSITE ALTERNATIVE

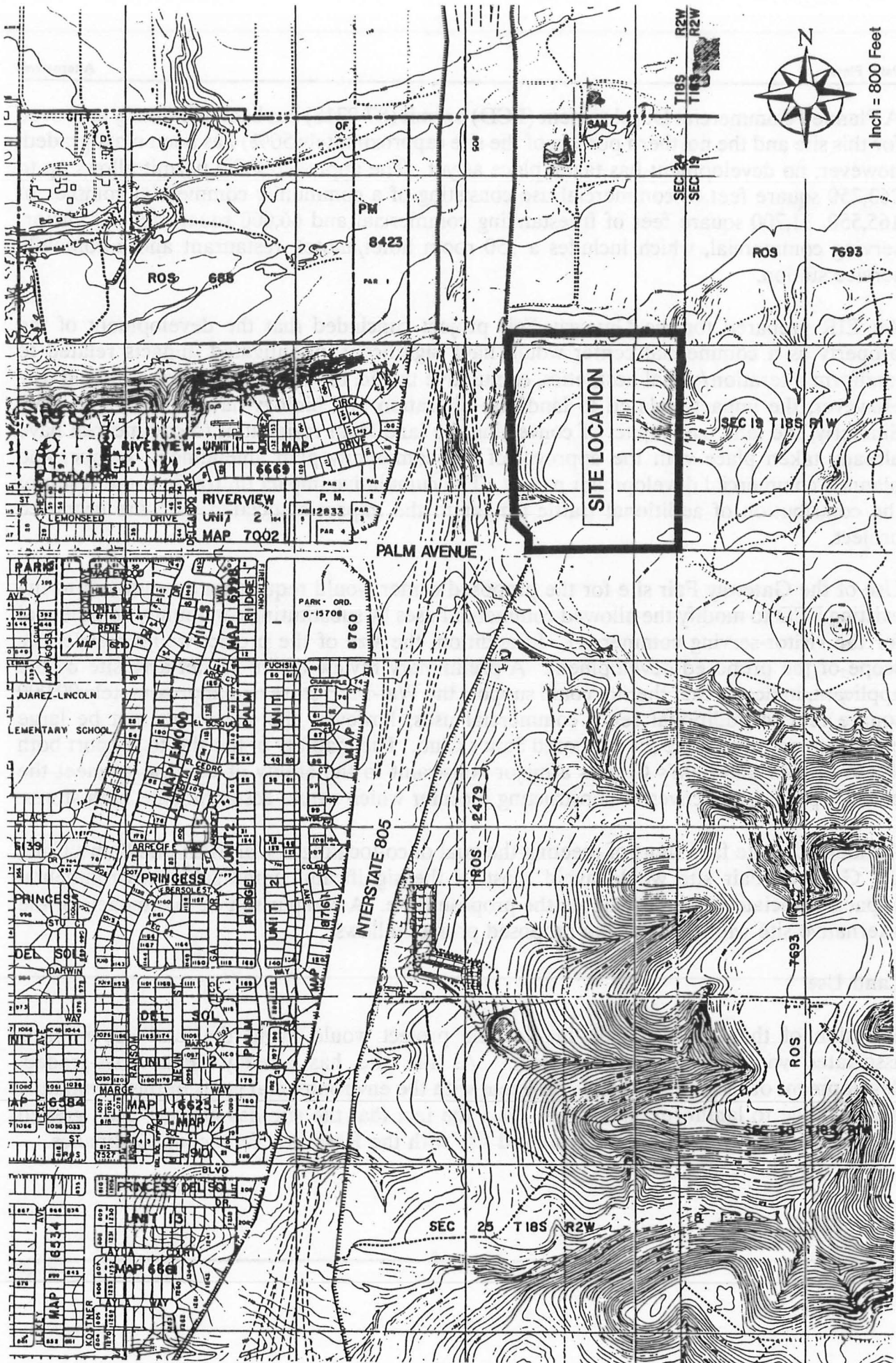
Recent court decisions have expanded the requirements for the alternatives analysis prepared in EIR's. The Citizens of Goleta Valley et al. vs. Board of Supervisors (Goleta II) case clarified when offsite alternative locations for a proposed project should be evaluated in an EIR. While the case confirmed that offsite alternatives should be evaluated, the case concluded that the doctrine of feasibility should guide the nature and scope of alternatives to be addressed. In accordance with these court rulings, this EIR evaluates offsite alternatives.

A number of criteria were taken into account during the evaluation of a potential offsite alternative including ability of the alternative to meet the basic objectives of the project. As described in Section III.A of this report, the major objectives of the project are to build a regional shopping center to support a Wal-Mart and Sam's Club to serve the Otay Mesa area.

On the basis of the project objectives, a property to the north, known as the Gateway Fair project, was selected as an offsite alternative. Although this site meets the locational criteria, it falls short of the acreage needed to accommodate the full project. As a result, a partial alternative is also considered which would place a portion of the proposed development on the subject property and a portion on the Gateway Fair site. A discussion of these two alternatives follows.

Full Offsite Alternative

The 31-acre site Gateway Fair site is located immediately north of the proposed site across Palm Avenue (Figure IX-1).



Location of Offsite Alternative

Figure IX-1

A Planned Commercial Development (PCD) permit (87-0218) has been previously approved for this site and the northern portion of the site (approximately 50%) has been mass-graded; however, no development has taken place as yet. The approved PCD permit allows up to 263,250 square feet of commercial use consisting of a community commercial complex of 165,550, 31,700 square feet of freestanding commercial and 66,000 square feet of visitor-serving commercial, which includes a 150 room hotel/motel, restaurant and automobile service station.

An EIR prepared for the Gateway Fair project concluded that the development of the property as a commercial center would have significant, unmitigated impacts related to landform alteration/visual aesthetics, cumulative traffic, biological resources and land use. However, the impacts related to landform alteration and biology have already occurred. Similarly, the land use impact of converting the land from residential to commercial have already taken place with the approval of the community plan amendment, rezone, and planned commercial development permit. The cumulative impact on traffic is the result of the contribution of additional traffic similar to the impact associated with the proposed project.

Use of the Gateway Fair site for the proposed center would require an amendment to the existing PCD to modify the allowed commercial uses by substituting community commercial for the visitor-serving commercial. In addition, the size of the project would restrict the scope of the proposed development. A preliminary review of the 25 net-acre site by the applicant, indicates that the site could support the Wal-Mart store and approximately 90,000 square feet of additional retail commercial uses; however, the site would not be large enough to accommodate the proposed Sam's Club. The inability of the site to support both the Wal-Mart and Sam's Club is a major constraint to the ability of this site to meet the primary project objectives of constructing a center which would accommodate both stores.

Although the site falls short of meeting the goal of co-locating a Wal-Mart and Sam's Club, the Gateway Fair site would avoid most of the significant, unmitigable environmental impacts associated with developing the proposed site. A comparison of the impacts of the alternative site with those of the proposed project follows:

Land Use

Selection of the Gateway Fair site for the project would avoid the land use impacts associated with the proposed project. As the site has already been mass-graded, development of the site would be consistent with the environmental goals of the community plan relative to landform alteration. Also, the fact that the site has already been graded would avoid the conflict on the proposed site with the Resource Protection Ordinance.

Landform Alterations/Visual Quality

As discussed previously, the majority of the grading necessary to develop the site has already taken place. Thus, this site would avoid the significant landform alteration impacts associated with the proposed project.

Traffic

The size of this site would dictate a reduction in the size of the project from the proposed 617,009 to approximately 245,000 square feet. This would reduce the cumulative project-generated traffic by approximately 604 % (30,200 to 5,000 ADT). Based on the conclusion of the original Gateway Fair project, which analyzed a similar square footage, local intersections would operate at LOS C or better with proposed improvements to South Palm Avenue along the project frontage. This alternative site, therefore, would avoid the significant, unmitigated traffic impacts at the freeway ramps and "A" Street. This benefit would be associated with the reduction in the size of the center rather than the alternative location.

Biological Resources

Prior to the recent grading of the site, approximately 20 to 25 acres of Diegan coastal sage scrub and maritime succulent scrub existed onsite, as well as several sensitive plant species. Sensitive bird species, including two pairs of California black-tailed gnatcatcher and an old cactus wren nest, were also observed on the site. The subsequent grading activity for Gateway Fair eliminated most of the sensitive habitat. As such, significant biological impacts associated with the proposed project would be eliminated since the alternative site has no remaining biological resources that would be considered sensitive.

Air Quality

This alternative would avoid significant air quality impacts as this site is already planned for a similar intensity of commercial development. Thereby avoiding the conflict with the Revised Regional Air Quality Strategy which is designed to meet, or at least move closer to, State and Federal emission standards for the San Diego Air Basin.

Conclusion

The Gateway Fair site would be the environmentally preferred alternative because it would utilize a site which has been approved for commercial development as well as mass graded. Thus, it would avoid the significant, unmitigated impacts of development of the proposed site related to land use, landform, biology, traffic (direct) and air quality. It would reduce but not avoid the cumulative traffic impact.

The applicant has rejected the Gateway Fair site because it cannot support the Sam's Club. As stated earlier, the co-location of a Wal-Mart and Sam's Club is a fundamental objective of the project.

Partial Offsite Alternative

This alternative would utilize the Gateway Fair site as well as the disturbed portion of the Palm Plaza site. This alternative would allow the applicant to meet the desired amount of commercial square footage while reducing the land use, landform and biological impacts; the traffic and air quality impacts would be unchanged.

Under this alternative, the Wal-Mart and approximately 25% of the proposed commercial retail uses (80,000 square feet) would be constructed on the Gateway Fair site. The Sam's Club and the remaining 217,300 square feet of commercial retail development would be constructed on the Palm Plaza site. Splitting the development between the two sites would allow greater flexibility in the location of "A" Street because less developable area must be provided on the Palm Plaza site. Thus, the partial offsite alternative would combine the elements of the Full Offsite and the modified "A" Street alternatives.

Construction of Street "A" would be necessary with this alternative to relieve projected congestion at the I-805/Palm Avenue interchange by allowing project traffic to access Del Sol Boulevard for east west access. Furthermore, the City considers the connection of Palm Avenue with Del Sol Boulevard via Street "A" to be an important element of the local circulation system.

A general discussion of the impacts follows.

Land Use

This alternative would substantially lessen but not avoid the significant land use impacts. Use of the Gateway Fair property would not involve significant land use impacts. As discussed earlier, this site has been graded and is designated for commercial use. With the decreased intensity of development on the Palm Plaza site, "A" Street could be moved further west in the southern portion of the site which would decrease the encroachment into steep slopes. However, significant manufactured slopes would continue to be required. Similarly, this alternative would reduce but likely not avoid the RPO impacts associated with the proposed project.

Landform Alteration

As discussed in Land Use, this alternative would potentially lessen but not avoid significant landform alteration impacts.

Traffic

As no change in the number of trips generated by the project would occur with this alternative, the traffic impacts would remain significant and unmitigable.

Biological Resources

Moving "A" Street further west would reduce the grading which would occur on the slopes in the southeastern portion of the property. Although no site plan has been prepared, this alternative could reduce the impact on sensitive vegetation types on the hillsides by moving the road westward. Roughly one acre of Diegan coastal sage scrub and one acre of maritime succulent scrub which would be impacted by the proposed project could be retained with this alternative. In addition, the loss of the 0.6 acres of mule fat scrub could be avoided.

While this alternative would reduce the project impact on sensitive biological resources, it would not avoid significant biological impacts as biologically sensitive resources would still be lost.

Air Quality

The air quality impacts of this alternative would be the same as the proposed project as trip generation would be unchanged.

Conclusion

The partial offsite alternative would substantially reduce but not eliminate the significant land use and landform alteration impacts associated with the proposed project. It would also lessen but not avoid significant biological impacts. Traffic and air quality impacts would be the same as the proposed project.

The applicant has rejected this alternative because it would not enable the maximum use of the project site and would require acquisition of the Gateway Fair site.

X. REFERENCES

City of San Diego, 1981.

Otay Mesa Community Plan, April 27.

City of San Diego, 1979.

Progress Guide and General Plan, February 26.

City of San Diego, 1990.

Zoning Ordinance, May.

RECON, 1991.

Preliminary Draft EIR for South Palm Precise Plan-Palm Ridge IV TM/PRD,
unpublished.

SANDAG, 1981.

Comprehensive Land Use Plan for Brown Field, Septemeber.

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XII. CERTIFICATION PAGE

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**MITIGATION MONITORING
AND
REPORTING PROGRAM**

for

**PALM PLAZA
San Diego, California**

DEP No. 92-0647

September 9, 1993

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program was prepared for the City of San Diego Palm Plaza project (DEP No. 92-0647) to comply with the mitigation monitoring statute (Public Resources Code Section 21081.6) which requires public agencies to adopt such programs to ensure effective implementation of the mitigation measures. This program shall be a requirement of the General Plan/Community Plan Amendment, Planned Commercial Development Permit, Rezone, Resource Protection Ordinance Permit, Conditional Use Permit, Tentative Map, and Land Development Permit from the City of San Diego.

Project Description

The proposed Palm Plaza is a retail commercial center covering approximately 59.4 acres of an 87.7-acre site in Otay Mesa. Development would consist of approximately 617,000 square feet of commercial uses to be anchored by a Wal-Mart and Sam's Club discount department store. The site is located southeast of the terminus of Palm Avenue at Interstate 805 in the Otay Mesa Community Plan area.

Discretionary actions covered by this environmental document include a General Plan/Community Plan Amendment, Planned Commercial Development Permit, Rezone, Resource Protection Ordinance Permit, Conditional Use Permit, and Tentative Map. No other discretionary actions are necessary to implement the project. Ministerial action necessary to implement the project would include a NPDES permit from the Water Quality Control Board, a Section 7 or 10A permit from the U.S. Fish & Wildlife Service, and a Land Development permit and Final Map from the City of San Diego.

Project Impacts, Mitigation Measures and Monitoring Program

The following text includes a summary of the potentially significant project impacts, a list of mitigation measures identified in the environmental impact report, and the monitoring efforts necessary to ensure that the mitigation measures are properly implemented. Mitigation measures, monitoring and reporting requirements shall be further detailed prior to construction and, as required, following project implementation. All mitigation measures shall be implemented through conditions of approval for the proposed Planned Commercial Development Permit and Tentative Map.

LAND USE

Significant Impacts

- 1) Implementation of the proposed project would have significant land use impacts related to conflicts with the environmental goals of the Otay Mesa Community Plan. The grading necessary to construct "A" Street would result in significant alteration

of the steep slopes along the eastern portion of the property by creating a cut slope which would extend for a distance of approximately 4,000 feet and reach a maximum height of 85 feet. This grading would conflict with the community plan goal of minimizing landform alteration. Design considerations preclude fully achieving the contour grading goals of the community plan.

- 2) The proposed project would have significant land use impacts related to conflicts with the City's Resource Protection Ordinance. Under RPO, the project exceeds the allowed encroachment into both sensitive slopes and biologically sensitive lands.

Mitigation

- 1) No project mitigation measures are available to reduce the land use impact related to the environmental goals of the community plan to below a level of significance. Only implementation of the No Project or Offsite alternative would avoid a significant impact on the environmental goals.
- 2) Biology mitigation measures provided under the Biological Resources section of this document would partially mitigate the project's impact relative to RPO. No measures are available to fully mitigate RPO impacts associated with encroachment into sensitive slopes nor are measures proposed for wetland impacts. Full mitigation of impacts to other biologically sensitive resources, Diegan coastal sage scrub, maritime succulent scrub and California gnatcatcher (as identified in Table IV-2 of the EIR) would be achieved by the biology mitigation measure to preserve Diegan coastal sage scrub habitat.

Monitoring & Reporting

- 1) Not applicable.
- 2) See Biology.

LANDFORM ALTERATIONS/VISUAL QUALITY

Significant Impacts

- 1) Visual impacts associated with slope grading would be significant. The 4,000 linear feet of manufactured slope with a maximum height of 85 feet along the east side of "A" Street would result in a significant impact.
- 2) The alteration of the eastern slopes and the creation of a manufactured bank reaching a maximum height of 85 feet and a horizontal length of approximately 4,000 feet would have a significant landform impact.

Mitigation

- 1) The visual impact of the proposed grading of the site would be mitigated by the revegetation of manufactured slopes with naturalized plant material which reflect the character of the adjacent native vegetation.
- 2) The proposed landscaping would not fully mitigate the landform impact. Full mitigation of the landform impact would only be possible with the adoption of the No Project, Offsite or Modified Roadway alternatives as discussed in Section IX of the EIR.

Monitoring & Reporting

- 1) Prior to issuance of a land development permit, final landscape plans shall be reviewed and approved by the Planning Department to confirm that naturalized plant material will be used. Prior to issuance of a Notice of Completion and Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that landscaping has been implemented pursuant to the approved plans.
- 2) Not applicable.

TRAFFIC

Significant Impacts

- 1) Under existing plus project conditions, the intersection analysis revealed that the intersections of Palm Avenue at the southbound and northbound I-805 ramp terminals would be significantly impacted, since they would be operating at LOS D during PM peak hours.
- 2) Signal warrant analysis determined that, without signalization, the project would have potentially significant impacts at two driveways under existing plus project conditions.
- 3) There would be a significant cumulative impact under the interim conditions with project scenario, which would consist of project traffic and traffic associated with 1513 dwelling units and 5.5 acres of commercial development in the area to the east of Palm Avenue. The southbound I-805 ramp terminal under this scenario would operate at an unacceptable LOS D during the afternoon peak hour.
- 4) Under the build-out with project conditions, there would be significant cumulative traffic impacts on the Palm Avenue/"A" Street intersection, the I-805/Palm Avenue ramp terminals, and the intersection of Del Sol Boulevard and "A" Street. The Palm Avenue "A" Street intersection would operate at an unacceptable LOS D in the AM

peak hour and LOS E during the PM peak hour. With ultimate lane assumptions at the I-805/Palm Avenue interchange, the ramp terminals would operate at LOS D in the AM and PM peak hours. The intersection of Del Sol Boulevard and "A" Street would operate at an unacceptable LOS D during the PM peak hour.

Mitigation

- 1) Existing plus project impacts on the northbound I-805/Palm Avenue ramp terminals would be reduced below a level of significance with implementation of the measure provided below. However, with this measure, the impact to the southbound I-805/Palm Avenue ramp terminals under the existing plus project scenarios would remain unmitigated, operating at LOS D during the PM peak hour.

Install, or otherwise, assure the lane configurations shown on Figure IV-14 of the EIR (Exhibit A) for the interchange of Palm Avenue/I-805 and traffic signals at the southbound and northbound ramp terminals.

- 2) Implementation of the following mitigation measure would reduce potentially significant site access impacts to below a level of significance:

Install, or otherwise, assure lane configurations shown on Figure IV-14 of the EIR and traffic signals at the intersections of "A" Street/Driveway "D" and "A" Street/Driveway "E".

- 3) No project mitigation measures are available to reduce the cumulative impact on the southbound I-805/Palm Avenue ramp terminals under the interim conditions with project scenario to below a level of significance.

- 4) Build-out with project impacts on the southbound and northbound ramp terminals would remain unmitigated (LOS D) even after ultimate improvements are made to the interchange. These ultimate improvements, which include widening of the Palm Avenue overpass, are not included as project mitigation. No measures have been identified which would fully mitigate the project's cumulative impact on the I-805/Palm Avenue interchange to below a level of significance. It is possible that the CALTRANS Project Study Report/Project Report process leading to implementation will identify such a measure.

Build-out with project impacts on the Palm Avenue/"A" Street intersection would be reduced but remain significant with implementation of the mitigation measure provided below. As shown in Figure IV-14 of the EIR, this measure would reconfigure the lanes previously assumed by the Community Plan. Level of service during the AM peak hour would remain at LOS D and improve from LOS E to LOS D during the PM peak hour. No project mitigation is available to avoid the LOS D

(AM) and D (PM) at the intersection after implementation of the following measure:

Install, or otherwise, assure lane configurations shown in Figure IV-14 of the EIR and traffic signal at the Palm Avenue/"A" Street intersection.

Implementation of the following mitigation measure would ensure that under buildout with project conditions, the intersection of Del Sol Boulevard/"A" Street would operate at LOS B during the morning peak hour. However, during the PM peak, the LOS D operating condition would remain.

Install, or otherwise, assure lane configurations shown on Figure IV-14 of the EIR and traffic signal at the intersection of Del Sol Boulevard and "A" Street.

Monitoring & Reporting

- 1) Prior to recordation of the final map, the required lane configurations and traffic signals for the interchange of Palm Avenue/I-805 shall be installed, or otherwise assured, by the project applicant to the satisfaction of the City Engineer and CALTRANS.
- 2) Prior to recordation of the final map, the project applicant shall install, or otherwise assure, the required lane configurations and traffic signals at the intersections of "A" Street/Driveway "D" and "A" Street/Driveway "E" to the satisfaction of the City Engineer.
- 3) Not applicable.
- 4) Prior to recordation of the final map, the project applicant shall install, or otherwise assure, required lane configurations and traffic signal for the Palm Avenue/"A" Street intersection to the satisfaction of the City Engineer.

Prior to recordation of final map, the project applicant shall install, or otherwise assure, the required lane configurations and traffic signal at the intersection of Del Sol Boulevard and "A" Street to the satisfaction of the City Engineer.

BIOLOGICAL RESOURCES

Significant Impacts

- 1) Development of the project would have significant direct and cumulative impacts to sensitive vegetation and wildlife found on the property. Two sensitive vegetation types would be directly impacted by onsite development and offsite construction of "A" Street: Diegan coastal sage scrub (3.9 acres) and maritime succulent scrub (1.5

acres). Several sensitive bird species would be impacted by the loss of these two vegetation types but the most notable is the federally-listed coastal California gnatcatcher. Six gnatcatchers were observed during biological surveys. An estimated 5.3 acres of vegetation being utilized by this bird would be lost with development of the site.

Significant direct impacts would occur to the maritime succulent scrub and sensitive species associated with this habitat: the cactus wren, snake cholla, San Diego bur-sage, coast barrel cactus, and cliff spurge.

- 2) The impact on foraging habitat for prey species in the southern non-native grassland is cumulatively significant. The loss of this habitat could potentially affect local populations of raptors and sensitive species which potentially occur in this habitat.
- 3) The loss of the mule fat scrub (0.6 acres) and seasonal isolated wetland (360 square feet) would be cumulatively but not directly significant. However, the loss of the seasonal isolated wetland would be directly significant if inhabited by the Riverside fairy shrimp.

Mitigation

- 1) The applicant shall demonstrate that 7.8 acres of high quality Diegan coastal sage scrub and 3.0 acres of high quality maritime succulent scrub have been preserved within the area shown on Figure IV-17. Offsite compensation may also occur at other approved locations. A recorded easement document or other document assuring acquisition of the mitigation acreage shall be provided which defines the conditions and limitations for the use of the mitigation area.
- 2) No mitigation measures to reduce the cumulative biological impact on the raptor foraging habitat to below a level of significance are considered feasible as onsite preservation would essentially preclude the proposed development. The impact would be avoided by the no project or offsite alternative.
- 3) No mitigation measures are proposed to reduce the cumulative biological impact on mule fat scrub and seasonal isolated wetland to below a level of significance. The impact would be avoided by the no project or offsite alternative. However, the project applicant is proposing to contribute \$10,000 to the City of San Diego's Mitigation Bank Program to help compensate for the cumulative biological impacts. This contribution, however, does not fully mitigate for these impacts.

Soil hydration tests shall be completed to determine whether the endangered Riverside fairy shrimp inhabits the seasonal wetland located on the property. If the species does occur, evidence shall be provided before commencement of grading that

a Section 7 or 10(a) agreement has been reached with the U.S. Fish and Wildlife Service.

Mitigation & Reporting

- 1) Prior to issuance of a grading permit or recordation of the final map, the applicant shall demonstrate to the satisfaction of the City Planning Director that 7.8 acres of high quality Diegan coastal sage scrub and 3.0 acres of high quality maritime succulent scrub have been preserved within the area shown on Figure IV-17. A recorded easement document or other document assuring acquisition of the mitigation acreage shall be provided to the Planning Director which defines the conditions and limitations for the use of the mitigation area. Compensation may occur at other locations with the approval of the City Planning Director.
- 2) Not applicable.
- 3) Prior to issuance of a grading permit or recordation of a final map, soil hydration tests shall be completed to determine whether the endangered Riverside fairy shrimp inhabits the seasonal wetland located on the property. A letter report from a qualified biologist detailing the methodology used and the results shall be approved by the Planning Director. If the species does occur, evidence shall be provided before commencement of grading that a Section 7 or 10(a) agreement has been reached with the U.S. Fish and Wildlife Service.

AIR QUALITY

Significant Impacts

- 1) Construction activities associated with the proposed project could create significant short-term air quality impacts by increasing the amount of particulate matter emitted into the San Diego air basin. The project could generate approximately 660 pounds per day of Particulate Matter (PM-10); any project which contributes more than 250 pounds per day is considered a major source of PM-10.
- 2) In conjunction with all other planned regional growth, the incremental contribution from mobile-source emissions to the non-attainment status of the San Diego Air Basin would be cumulatively significant. The unacceptable level of service expected on Palm Avenue and at the intersections of Palm Avenue/southbound ramp of I-805 and Palm Avenue/"A" Street would compound regional air quality problems.

Mitigation

Mitigation

Potential air quality impacts would be decreased to below a level of significance with implementation of the following mitigations measures:

- 1) The developer shall comply with all San Diego County APCD measures regarding control of nuisance from the generation of dust and fumes during construction. Dust control measures capable of attaining dust control efficiencies of 75 percent shall be implemented. Measures shall include: (1) twice-daily watering of disturbance areas, and (2) chemical stabilization of off-road haul routes.
- 2) A Transportation Demand Management Plan shall be prepared which includes the measures recommended for regional shopping centers which include but are not limited to:
 - Incorporation of transit access considerations into project design;
 - Development of employee rideshare incentives; and
 - Coordination of rideshare information among all site tenants via ride-matching services provided by the property manager.

Monitoring & Reporting

- 1) Prior to approval of a land development permit, the plans shall be reviewed by the City Engineer to assure that appropriate dust control measures are proposed. Implementation of these measures shall be confirmed during periodic inspections by the Field Engineering Division during the grading operation.
- 2) The project applicant shall prepare a Transportation Demand Management Plan for approval prior to building permit issuance. The Transportation Demand Management Plan shall contain enforcement provisions subject to the satisfaction of the TDM Administrator.

NOISE

Significant Impacts

- 1) The additional traffic related to the commercial use on "A" Street would increase traffic noise above that which would occur with residential development. Although traffic volumes would exceed 65 dB(A) without the commercial use, the increase in project traffic would extend the 65 dB(A) contour an additional 65 feet along the "A" Street through the property and 45 feet further from the road to the south. This would affect future residential developments expected to occur to the east and south.

Mitigation

- 1) No project-specific mitigation would be required for noise generation because no development exists in the affected areas. Future development will require discretionary actions and would involve environmental review. At that time, future development would be required to construct noise barriers sufficient to reduce noise levels to acceptable standards.

Monitoring & Reporting

- 1) Not applicable.

GEOLOGY/SOILS

Significant Impacts

- 1) Unstable geologic and soil conditions occur onsite and represent a potentially significant constraint to development. These conditions are associated with the highly weathered bedrock and terrace deposits; poor structural support associated with fills, alluvium/slopewash, topsoil, colluvium, trash dump material, and highly expansive soils encountered onsite; and the potential for the La Nacion Fault Zone, bentonite clay beds, and landslide deposits to create unstable conditions on proposed 2:1 cut slopes.
- 2) After grading, exposed soils which may contain bentonite could have a significant impact on efficient irrigation and healthy plant growth.

Mitigation

- 1) Full mitigation of impacts associated with unstable soil and geologic conditions would require preparation of a detailed evaluation of the seismic conditions, undocumented fills, expansive soils, terrace deposits, alluvium/slope wash, colluvium, bentonite clay deposits, trash dump materials, landslide deposits, and bedrock formations. The study would provide remedial grading measures to mitigate any unstable soil, bedrock, or seismic conditions.

All project building plans shall be in compliance with seismic design standards of the Uniform Building Code.

- 2) The impact associated with efficient landscape irrigation would be fully mitigated with implementation of the following measures:

Those areas found to contain bentonite or compacted soils shall be tilled and proper soil preparation measures (specified by a landscape architect) shall be utilized prior to the planting of any project vegetation.

Organic material such as peat moss or nitrolized soil amendments shall be mixed with existing soil for use as a backfill planting mixture.

Monitoring & Reporting

- 1) Prior to issuance of a land development permit, a soils investigation shall be prepared by the project applicant to the satisfaction of the City Engineer. The City Engineer shall assure that the approved remedial measures have been incorporated into the project's grading plan. Prior to issuance of a Notice of Completion and Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that remedial grading measures have been implemented pursuant to the approved plans. Prior to building permit issuance, all project building plans shall be approved to the satisfaction of the City Engineer for compliance to the Uniform Building Code.
- 2) Prior to issuance of a land development permit, the Planning Department shall confirm that appropriate soil preparation and irrigation measures are proposed to facilitate landscape establishment. Prior to issuance of a Notice of Completion and Acceptance, the Field Engineering Division of the Engineering and Development Department shall conduct a final inspection of the site to confirm that soil preparation and irrigation techniques have been implemented pursuant to the approved landscape plans.

UTILITIES

Significant Impacts

- 1) The project would have a potentially significant impact on water availability to the site if improvements shown to be needed by the water system update are not implemented.
- 2) Project implementation would not have a significant impact on sewer service in the area. Adequate capacity exists to provide sewer service to the proposed project; however, potentially significant impacts would be associated with the construction of offsite sewer improvements. The offsite facilities would be required to connect to existing sewer main lines.

Mitigation

- 1) The developer shall update the "Water System Analysis of Two Transmission Alternatives for the South San Diego/Otay Mesa Service Areas" prepared by Boyle Engineering, dated September, 1990. Environmental studies of the offsite facilities needed to serve the project shall be conducted, as appropriate, and the developer shall install, or otherwise assure, all water facilities required to serve the project.
- 2) The developer shall provide a sewer study for the sizing of gravity sewer mains and to show that the existing and proposed mains will provide adequate capacity and have cleansing velocities. Environmental studies of the offsite facilities needed to serve the project shall be conducted, as appropriate, and the developer shall install, or otherwise assure, all sewer facilities required to serve the project.

Monitoring & Reporting

- 1) Prior to recordation of a final map, the developer shall update the water study to the satisfaction of the Water Utilities Director. As appropriate, environmental studies of the offsite facilities needed to serve the project shall be conducted by the project applicant and approved by the Planning Director prior to recordation of final map. The developer shall install, or otherwise assure, all onsite and offsite water facilities required to serve the project to the satisfaction of the Water Utilities Director prior to recordation of final map. Prior to issuance of building permits, written verification shall be obtained from the Water Utilities Department to ensure that adequate water service will be supplied to the project.
- 2) Prior to recordation of a final map, a sewer study shall be prepared to satisfaction of the Water Utilities Director. As appropriate, environmental studies of the offsite sewer facilities needed to serve the project shall be conducted by the project applicant and approved by the Planning Director prior to recordation of a final map. The developer shall install, or otherwise assure, all onsite and offsite sewer facilities required to serve the project to the satisfaction of the Water Utilities Director prior to recordation of a final map. Prior to issuance of building permits, written verification shall be obtained from the Water Utilities Department to ensure that adequate sewer service will be supplied to the project.

PALEONTOLOGY

Significant Impacts

- 1) Grading for project development could result in potentially significant impacts to paleontological resources, specifically in the Otay formation.

Mitigation

- 1) Paleontological impacts would be fully mitigated with the preparation and implementation of a paleontological resource recovery program.

Monitoring & Reporting

- 1) Prior to issuance of a land development permit, the applicant shall provide written verification that a qualified paleontologist and/or paleontological monitor have been retained to implement this monitoring program. Verification shall be in the form of a letter from the project applicant to the Principal Planner of the Environmental Analysis Section (EAS) of the City of San Diego Planning Department. A qualified paleontologist is defined as an individual with a Ph.D. or M.S. degree in paleontology or geology, who is a recognized expert in the application of paleontological procedures and techniques such as screen washing of materials and identification of fossil deposits. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials and who is working under the direction of a qualified paleontologist. All persons involved in the paleontological monitoring shall be approved by EAS prior to any pre-construction meetings.

The qualified paleontologist shall attend any pre-construction meetings to consult with the excavation contractor. The project applicant shall notify EAS staff of any pre-construction meeting dates, and of the start and end of construction. The requirement for paleontological monitoring shall be noted on all grading plans. The paleontologist's duties shall include monitoring, salvaging, preparation of materials for deposit at a scientific institution that houses paleontological collections, and preparation of a report summarizing the results of the monitoring efforts. The duties are defined as follows:

- a. Monitoring

The paleontologist or paleontological monitor shall be onsite during the original cutting of previously undisturbed areas of the formations to inspect for well-preserved fossils. The paleontologist shall work with the contractor to determine the monitoring locations and the amount of time necessary to ensure adequate monitoring of the project.

- b. Salvaging

In the event that well-preserved fossils are found, the paleontologist shall have the authority to divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely manner. Recovery is anticipated to take from one hour to a maximum of two (2) days.

At the time of discovery, the paleontologist shall contact EAS. EAS must concur with the salvaging methods before construction is allowed to resume.

c. Preparation

Fossil remains shall be cleaned, sorted, catalogued, and then deposited in a scientific institution that houses paleontological collections (such as the San Diego Natural History Museum).

d. Monitoring Report

A monitoring report, with appropriate graphics, summarizing the results, analysis and conclusions of the above program shall be prepared and submitted to EAS and the San Diego History Museum within three (3) months following termination of the paleontological monitoring program. Building permits shall not be approved prior to receipt of this report.

HYDROLOGY/WATER QUALITY

Significant Impacts

- 1) Development of the project would result in an increase in the urban runoff problems within the Otay and Tijuana River basins. During construction, uncontrolled surface runoff would create erosion and sedimentation problems. Once developed, runoff from future streets and parking areas would collect harmful materials such as oil, rubber, metals and trash. While insignificant in and of themselves, these impacts would have a cumulatively significant impact on water quality.

Mitigation

Implementation of the following mitigation measures, project impacts associated with water quality would be reduced to below a level of significance:

- 1) Water pollution control devices shall be installed by the project applicant to intercept flow before discharge into the drainage system to the extent determined feasible by the City Engineer.

Appropriate measures shall be utilized during construction to control runoff from construction sites. Temporary desilting basins shall be incorporated to keep sediment from the graded pads from entering the storm drain system. The collected silt shall be removed from these inlet structures after each major rainfall. Sandbagging along street and utility trenches shall be used for temporary erosion control prior to completion of final improvements. The City's Best Management Practices for Stormwater Pollution Control shall be identified and implemented.

Monitoring & Reporting

- 1) Prior to issuance of a land development permit, the City Engineer shall review the grading plan to ensure that erosion control measures are provided. The project applicant shall provide evidence to the City Engineer indicating compliance with the National Pollutant Discharge Elimination System requirements by filing a Notice of Intent with the State of California Water Resources Control Board (SWRCB), and by implementing a Storm Water Pollution Prevention Plan satisfactory to the SWRCB.

Prior to issuance of a Certificate of Occupancy and Final Inspection, the Inspection Services Division of the Building Inspection Department shall conduct a final inspection of the site to confirm that water pollution control devices have been installed pursuant to the approved building plans.