THE CITY OF SAN DIEGO

ADDENDUM

Project No. 1048583
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: Britannia Airway Logistics Center: A request for a SITE DEVELOPMENT PERMIT (SDP) and PLANNED DEVELOPMENT PERMIT (PDP) to develop a fenced truck/trailer parking facility providing a total of 871 truck/trailer parking spaces that would be available for up to nine tenants/users. Each tenant/user would have a modular trailer office of approximately 720 square feet with 3 vehicle parking spaces, for a total of up to 6,480 square feet of modular trailer office and 27 vehicle parking spaces. The main parking area would be a pervious surface consisting of nine inches of recycled Class II Base. The project proposes access to the site via Airway Road, Cactus Road, and Britannia Boulevard. The project is requesting a deviation from the Land Development Code requirement (Section 142.0560(j) Table 142-05M) from maximum allowed 30-foot-wide driveways to 40-foot-wide driveways to accommodate semi-truck turn radius movements. On Airway Road, a total of five driveways are proposed. One driveway is proposed on Britannia Boulevard, and one driveway is proposed on Cactus Road. The project would also be subject to the Limited Use requirements for Automobile Storage. The proposed parking facility would be an interim use on both the western and eastern halves of the project site until the time that the City develops Grand Park (Project OM P-11.1; estimated in year 2042) pursuant to Otay Mesa Public Facility Financing Plan (City of San Diego 2014a).The project would include frontage improvements to Airway Road, Britannia Boulevard, and Cactus Road. As a part of the project frontage improvements, the project would dedicate 61- 71 feet and widen Airway Road and construct a full width raised median along the project frontage provide half-width improvements to include a 54-64 foot centerline-to-curb width and a 27-foot parkway and removal of power poles from the traveled way. The project would dedicate 45 feet and widen Britannia Boulevard along the project frontage to provide half-width improvements to include a 55-foot centerline-to-curb width and a 20-foot parkway. The project would also dedicate 40-56-feet and widen Cactus Road and construct a full width raised median to provide half-width frontage improvements to include a 38-54-foot centerline-to-curb width and a 22-foot parkway and removal of power poles from traveled way.

The 39.61-acre vacant project site is located south of Airway Road between Britannia Boulevard and Cactus Road. The net acreage to the existing right-of-way (ROW) is 37.66 acres, and the net acreage as a result of the ultimate ROW is 32.55 acres. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park-Office Permitted in the Otay Mesa Community Plan (OMCP) (City of San Diego 2014b). The 16.77-net acre western half of the project site is

designated as Park in the General Plan and OMCP. The site is zoned International Business and Trade (IBT-1-1) per the OMCP. Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Brown Field), the Airport Influence Area (Brown Field, Review Area 1 and 2), the Federal Aviation Administration Part 77 Noticing Area (Brown Field), the Airport Safety Zones (Brown Field- Zone 6), the Very High Fire Hazard Severity Zone, and Transit Priority Area. (LEGAL DESCRIPTION: North quarter of the southeast quarter of Section 33, Township 18 South, Range 1 West, San Bernardino base and meridian, in the County of San Diego, State of California, according to the plat in that certain decree establishing boundary lines in the southeast quarter of said Section 33, in Superior Court of San Diego County, Case No. 212718, a certified copy of said decree being recorded March 3, 1958 in book 6975, page 305 of official records, said boundary line in said Decree being as follows: Beginning at the east quarter corner of said section; thence south 1° 27' 10" west along the east line of said section, 662.92 feet to an old fence line position; thence along said old fence line position, north 89° 46' 40" west, 2642.60 feet to the west line of said southeast quarter; thence along said west line, north 1° 24' east, 662.38 feet [measured 754.41 feet] to the center line of airway road known as road survey no. 121; thence along said center line, south 89° 40' 50" east, 2643.12 feet to the point of beginning. Excepting therefrom that portion of said land, if any, lying within the southeast quarter of the northeast quarter of the southeast quarter and the southwest quarter of the northeast quarter of the southeast quarter of said section 33.) APN 646-100-74. Applicant: Badiee Development.

I. SUMMARY OF ORIGINAL PROJECT

The project site is located within the plan boundaries of the OMCP. The Otay Mesa Community Plan Update (OMCPU) Final Program Environmental Impact Report (Project No. 30330/304032; SCH No. 2004651076) (hereinafter referred to as the OMCPU Final PEIR) was certified by the San Diego City Council on March 11, 2014, Resolution No. R-308810 (City of San Diego 2014c). The OMCPU involved an update to the OMCP, a General Plan Amendment, rescission of the Otay Mesa Development District, adoption of a Rezone Ordinance to replace the Otay Mesa Development District with citywide zoning and creation of two new CPIOZs, amendments to the City of San Diego (City) Land Development Code (LDC), and an update of the OMCP Public Facilities Financing Plan (PFFP). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the OMCPU Final PEIR examined the environmental impacts of the OMCP.

The OMCPU provides for a long-range, comprehensive policy framework for growth and development in the OMCP through 2062. The OMCPU identified a land use strategy with new land use designation proposals to create villages, activity centers, and industrial/employment centers along major transportation corridors, while strengthening cultural and business linkages to Tijuana, Mexico via the Otay Mesa Port of Entry. The land use element established a number of land use planning goals for the OMCP area, such as providing a distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services needed to serve the planning area: providing distinct villages that include places to live, work, and recreate; providing diversified commercial uses that serve local, community, and regional needs, and providing sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center, among others.

The OMCPU included the same nine elements contained in the City's 2008 General Plan, with goals and policies for each element. The nine elements are: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation.

The OMCPU Final PEIR concluded that the project would result in significant and unmitigated environmental impacts to air quality, greenhouse gas (GHG) emissions, noise, transportation/circulation, and utilities. The following issue areas were determined to be significant but mitigated to below a level of significance: land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources. All other impacts analyzed in the OMCPU Final PEIR were determined to be less than significant.

Implementation of the OMCP requires subsequent approval of public or private development proposals (i.e., future development) to carry out the land use plan and demonstrate compliance with policies presented in the OMCP.

The 39.61-acre undeveloped project site is located south of Airway Road between Britannia Boulevard and Cactus Road within the Central District of the OMCP. The net acreage to the existing ROW is 37.66 acres, and the net acreage as a result of the ultimate ROW is 32.55 acres. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park-Office Permitted in the OMCP. The 16.77-net acre western half of the project site is designated as Park in the General Plan and OMCP. The western half is anticipated to be developed as a Grand Park in 2042.The site is zoned International Business and Trade (IBT-1-1) per the OMCP. Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Brown Field), the Airport Influence Area (Brown Field, Review Area 1 and 2), the Federal Aviation Administration Part 77 Noticing Area (Brown Field), the Airport Safety Zones (Brown Field- Zone 6), the Very High Fire Hazard Severity Zone, and Transit Priority Area.

II. SUMMARY OF PROPOSED PROJECT

A request for a SITE DEVELOPMENT PERMIT and PLANNED DEVELOPMENT PERMIT (PDP) to develop a fenced truck/trailer parking facility providing a total of 871 truck/trailer parking spaces that would be available for up to 9 tenants/users. An SDP decided in accordance with Process 3 is required where environmentally sensitive lands are present for Industrial development on a premise containing environmentally sensitive lands (Section 143.0110). Additionally, an SDP is required for development within the Airport Land Use Compatibility Overlay Zone for safety compatibility (Section132.1515). Each tenant/user would have a modular trailer office of approximately 720 square feet with 3 vehicle parking spaces, for a total of up to 6,480 square feet of modular trailer office and 27 vehicle parking spaces. The main parking area would be a pervious surface consisting of 9 inches of recycled Class II Base.

The project proposes access to the site via Airway Road, Cactus Road and Britannia Boulevard. The project is requesting a PLANNED DEVELOPMENT PERMIT (PDP) for a deviation from the Land Development Code requirement (Section 142.0560(j) Table 142-05M) maximum allowed 30-foot-wide driveways to 40-foot-wide driveways to accommodate semi-truck turn radius movements. Access to the site would be proposed via the following seven driveways:

- Along Airway Road, an easterly full access driveway is proposed approximately 670 feet from the intersection of Britannia Boulevard and Airway Road.
- Along Airway Road, a middle full access driveway is proposed at Continental Street.
- Along Airway Road, westerly full access driveway is proposed approximately 740 feet from Continental Street and approximately 450 feet from Cactus Road.
- Along Airway Road, a right-in/right-out driveway is proposed
- Along Airway Road, a right-out only driveway is proposed
- Along Cactus Road, a right-in/right-out only driveway is proposed approximately 520 feet south of Airway Road.
- Along Britannia Boulevard, a right-in/right-out only driveway is proposed approximately 450 feet south of Airway Road.

The project proposes gates at all the driveways. These gates will remain open during business hours to ensure that queuing of vehicles would not occur into the public ROW. The project would also be subject to the Limited Use requirements for Automobile Storage.

Consistent with the Airway Road ultimate classification of a 6-lane Major, per the City of San Diego Street Design Manual, the project would dedicate 61 to 71 feet and widen Airway Road and construct a full-width raised median along the project frontage and provide half-width improvements to include a 54-foot to 64-foot centerline-to-curb width and a 27-foot parkway and removal of power poles from the traveled way. The 27-foot parkway width would include an 8.5-foot landscape buffer as part of a green street biofiltration basin, 2-foot bike path buffer, 8-foot Class I bike path, 2-foot bike path buffer and a 6-foot non-contiguous sidewalk, consistent with the Central Village Specific Plan approved by City Council on April 4, 2017, with the exception of an 8-foot Class I bike path (vs. 10-foot Class I bike path in the Central Village Specific Plan), which is required in order to provide a cross section consistent with City of San Diego Green Street standards.

Consistent with the Britannia Boulevard ultimate classification of a 6-lane Major, per the City of San Diego Street Design Manual, the project would dedicate 45 feet and widen Britannia Boulevard along the project frontage and provide half-width improvements to include a 55-foot centerline-to-curb width and a 20-foot parkway. This 20-foot parkway width would include a 14-foot landscape buffer, which includes a green street biofiltration basin, and a 6-foot non-contiguous sidewalk.

Consistent with the Cactus Road ultimate classification of a 4-lane Major, per the City of San Diego Street Design Manual, the project would dedicate 40 to 56 feet and widen Cactus Road and construct a full width raised median along the project frontage and provide half-width improvements to include a 38-foot to 54-foot centerline-to-curb width and a 22-foot wide parkway and removal of power poles from the traveled way. This 22-foot parkway width would include a 16-foot landscape buffer, which includes a green street biofiltration basin, and a 6-foot non-contiguous sidewalk.

The proposed parking facility would be an interim use on both the western and eastern halves of the project site until the time that the City develops Grand Park (Project OM P-11.1; estimated in year 2042) pursuant to Otay Mesa Public Facility Financing Plan (City of San Diego 2014a). Figures 1 and 2 present the regional and project locations, respectively. (see Figure 3, *proposed site plan*).

III. ENVIRONMENTAL SETTING

The 37.66-net acre project site is located immediately south of Airway Road, west of Britannia Boulevard, and east of Cactus Road. Vegetation on the project site consists non-native grassland (11.30 acres), disturbed land (26.31 acres), and developed land (0.05 acre). Site topography is gently to moderately sloping, with elevations ranging from 495 to 515 feet above mean sea level. The project is located in an urbanizing environment, surrounded by an existing automobile auction site consisting of paved parking lots immediately to the south and existing industrial warehouses to the east. Multi-family residential uses are currently under construction immediately north of the eastern half of the project site (Silo at Epoca Apartments) and immediately west and southwest of the project site west of Cactus Road (Otay Mesa Lumina). Existing single-family residential uses are located further to the northwest and southwest of the project site. Additionally, mixed-use commercial/residential development is planned for the undeveloped site immediately north of the western half of the project site. Brown Field Municipal Airport is located approximately 0.5-mile north of the project site. The project site is located in a developed area currently served by existing public services and utilities.

The site is zoned International Business and Trade (IBT-1-1) in the City's Official Zoning Map. The gross acreage of the project site to the center line of streets is 39.61 acres. The net acreage to the existing ROW is 37.66 acres and the net acreage as a result of the ultimate ROW is 32.55 acres. The 39.61-acre undeveloped project site is located south of Airway Road between Britannia Boulevard and Cactus Road within the Central District of the OMCP. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park in the OMCP. The 16.77-net acre western half of the project site is designated as Park in the General Plan and OMCP. The western half is anticipated to be developed as a Grand Park in 2042 (City of San Diego 2014a). The site is zoned International Business and Trade (IBT-1-1) per the OMCP. Additionally, the project site is located within the Airport Land Use Compatibility Overlay Zone (Brown Field), the Airport Influence Area (Brown Field, Review Area 1 and 2), the Federal Aviation Administration Part 77 Noticing Area (Brown Field), the Airport Safety Zones (Brown Field- Zone 6), the Multiple Species Conservation Program Subarea Plan, Communities of Concern, Mobility Zone 2, the Very High Fire Hazard Severity Zone, and Transit Priority Area.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the OMCPU Final PEIR (Project No. 30330/304032/SCH No. 2004651076) per Resolution No. R-30881 on March 11, 2014. Based on all available information in the record, the analysis in this Addendum, and pursuant to Section 15162 and 15164 of the State CEQA Guidelines, the City has determined that:

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

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental

document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

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

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

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

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

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

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum to the OMCPU Final PEIR has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The OMCPU Final PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per the CEQA.

V. IMPACT ANALYSIS

This Addendum includes the environmental issues analyzed in detail in the previously certified PEIR as well as the project-specific environmental analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The OMCPU Final PEIR identified significant impacts related to land use, air quality, biological resources, transportation/circulation, geology/soils, historical resources, hydrology/water quality, paleontological resources, human health/public safety/hazardous materials, noise, utilities, and greenhouse gas emissions. All impacts would be mitigated to below a level of significance, except air quality, transportation/circulation, noise, utilities and GHG emissions that would be significant and unmitigated.

This Addendum includes the subsequent impact analysis to demonstrate that environmental impacts associated with the proposed project are consistent with or not greater than the impacts disclosed in the previously certified OMCPU Final PEIR. This Addendum includes the environmental issues analyzed in detail in the previously certified OMCPU Final PEIR, as well as the subsequent project-specific environmental analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the OMCPU Final PEIR relative to the project and documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified environmental document.

The following analysis indicates there would be no new significant impacts, nor would there be an increase in the severity of impacts resulting from the project. Further, there is no new information in the record or otherwise available indicating that there are substantial changes in circumstances that would require major changes to the OMCPU Final PEIR. A comparison of the project's impacts related to those of the certified OMCPU Final PEIR is provided below in Table 1, Impact Assessment Summary.

Table 1
Impact Assessment Summary

Environmental Issues	OMCPU Final PEIR Finding Analysis	OMCP Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Land Use	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Visual Effects and Neighborhood Character	Less than significant	No	No new impacts	No	Less than Significant
Air Quality/Odor	Significant, unmitigated	Yes	No new impacts	No	Less than Significant
Biological Resources	Significant but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than Significant
Historical Resources	Significant, but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than Significant
Human Health/Public Safety/Hazardous Materials	Significant, but mitigated	Yes	No new impacts	No	Less than Significant
Hydrology/Water Quality	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Geology/Soils	Significant but mitigated	Yes	No new impacts	No	Less than significant
Energy Conservation	Less than significant	No	No new impacts	No	Less than significant
Noise	Significant, unmitigated	Yes	No new impacts	No	Less than Significant
Paleontological Resources	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Transportation/ Circulation	Significant, unmitigated	Yes	No new impacts	No	Less than Significant
Public Services	Less than significant	No	No new impacts	No	Less than Significant

Table 1 Impact Assessment Summary					
Environmental Issues	OMCPU Final PEIR Finding Analysis	OMCP Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Utilities	Significant, unmitigated	Yes	No new impacts	No	Less than significant
Water Supply	Less than significant	No	No new impacts	No	Less than significant
Population and Housing	Less than significant	No	No new impacts	No	Less than significant
Agricultural and Mineral Resources	Less than significant	No	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Significant, unmitigated	Yes	No new impacts	No	Less than significant

Land Use

OMCPU Final PEIR

Land Use Plan Conflict
Land Use is discussed in Section 5.1 of the OMCPU Final PEIR that concluded that implementation of the OMCP would not result in impacts related to conflicts with applicable local and regional land use plans. The OMCPU Final PEIR found that the goals, policies, and programs of the OMCP were consistent with existing applicable local land use plans, policies, and regulations. This includes consistency with the City General Plan, San Diego Association of Governments (SANDAG) Regional Comprehensive Plan, SANDAG 2050 Regional Transportation Plan, Brown Field Master Plan and Airport Land Use Compatibility Plan (ALUCP), and City's Multiple Species Conservation Program (MSCP) Subarea Plan. Therefore, impacts were identified to be less than significant.

Land Use Compatibility
The OMCPU Final PEIR identified that residential and industrial uses collocated in proximity to one another could result in incompatible land use impacts. The OMCPU Final PEIR further identified that future development projects would be required to comply with the collocation policies of the General Plan and OMCP to reduce or avoid potential land use incompatibility impacts. The OMCPU Final PEIR determined that compliance with the OMCP and General Plan policies, along with local, state, and federal regulations, would reduce potential impacts of collocation to below a level of significance. As detailed in Section 5.2.4.2(b) of the OMCPU Final PEIR, implementation of the OMCP would entail the conversion of industrial and agricultural lands to residential and other mixed uses. The environmental effects that would result include the increased potential for exposure of sensitive receptors to hazardous materials. Implementation of Mitigation Framework HAZ-3 would reduce impacts related to conversion of industrial and agricultural lands to residential and other mixed uses in accordance with the OMCP to a level less than significant.

Regulatory Consistency
The Land Use Section of the OMCPU Final PEIR also addresses the City's polices included in the OMCP's Conservation Element directed at implementing Environmentally Sensitive Lands (ESL) regulations, the MSCP, and the Biology Guidelines. The OMCPU Final PEIR identified that the development footprint of the OMCP would encroach into sensitive ESL areas, which would conflict

with the City's ESL Regulations. Implementation of OMCPU Final PEIR Mitigation Framework LU-1a would reduce impacts to ESL areas to a level less than significant. Additionally, implementation of the project would have the potential to result in significant impacts to historical resources given the presence of historical resources throughout the OMCP area, which would conflict with the City's Historic Resource Guidelines. However, the OMCPU Final PEIR determined that implementation of Final PEIR Mitigation Framework LU-1b would reduce conflicts with the City's Historic Resource Guidelines to a level less than significant. Final PEIR Mitigation Framework LU-1b stated that future development project types that are consistent with the OMCP, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and Final PEIR Mitigation Framework HIST-1. Therefore, the OMCPU Final PEIR determined that conflicts with the City's ESL Regulations and Historic Resource Guidelines would be mitigated to a level less than significant.

The OMCP Final PEIR identified that future projects within the OMCP area would be required to comply with the LDC. This includes brush management for structures within 100 feet of native or naturalized vegetation. No conflict with the Brush Management Regulations were identified, as project would continue to be required to comply with the LDC with the adoption of the OMCPU. Impacts would be less than significant.

Environmental Plan Consistency
The OMCPU Final PEIR determined that future development on, or adjacent to, land designated as Multi-Habitat Planning Area (MHPA) by the City's MSCP Subarea Plan could result in direct and indirect impacts to biological resources that would conflict with the City's MHPA. However, the OMCPU Final PEIR determined that implementation of OMCPU Final PEIR Mitigation Framework BIO-1 through BIO-4 would reduce direct impacts to sensitive vegetation, wetlands and vernal pools within the MHPA to a level less than significant. Additionally, Final PEIR Mitigation Framework LU-2 would require all subsequent development projects implemented in accordance with the OMCP adjacent to designated MHPA areas to comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Therefore, the Final PEIR determined that conflicts with the City's MHPA would be mitigated to a level less than significant.

Project

Land Use Plan Conflict
The entire project site is zoned IBT-1-1 in the City's Official Zoning Map. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park-Office Permitted in the OMCP. The 16.77-net acre western half of the project site is designated as Park in the General Plan and Otay Mesa Community Plan. The entire project would be an interim use until the time that the City may develop the western half of the project site as a park in 2042 pursuant to the Otay Mesa Public Facilities Financing Plan (City of San Diego 2014a). The project would be consistent with the zoning and the land use designation of the eastern half of the project site and although the western half of the project is designated as Park, the interim use of the site as a parking facility would not preclude the future development of Grand Park. The project would be

conditioned so that the portion of the project site designated as Park would be available for acquisition and development of a park in 2042. As described in the analysis in the sections below, this land use inconsistency would not result in any secondary environmental impacts. Therefore, the project would not divide an established community or result in a land use plan consultation, and impacts would be less than significant.

Review of the Brown Field Municipal Airport, ALUCP Exhibit III-1 Noise determined that the project site is located outside of the 60 A-weighted decibels [dB(A)] Community Noise Equivalent Level (CNEL) noise contour, and therefore would be exposed to aircraft noise levels less than 60 dB(A) CNEL. Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is located within Zone 6 Traffic Pattern Zone. Industrial uses are considered compatible within Zone 6. The project site is located within Airport Influence Area - Review Areas 1 and 2 for Brown Field Municipal Airport and within the Federal Aviation Administration (FAA) Part 77 Notification Area for Brown Field Municipal Airport. However, the proposed trailers would not exceed applicable height limits for these zones and would not create a hazard related to air navigation. Therefore, project land uses would be compatible with the applicable airport compatibility plan, and impacts would be less than significant.

Land Use Compatibility
The truck/trailer parking facility would be consistent with the existing automobile auction site consisting of paved parking lots immediately south of the project site. As described in the impact analysis of air quality and noise below, operation of the project would not impact residential uses in the vicinity of the project site. The project site is not within or immediately adjacent to the MHPA, and therefore would not conflict with the City's MSCP Subarea Plan for habitat conservation. As described in the human health/public safety/hazardous materials section below, review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control Envirostor databases determined that there are no contaminated sites on or adjacent to the project site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. As described in the discussion of land use plan conflict above, the entire project would be an interim use until 2042 when the western half of the project site is anticipated to be acquired and developed as part of Grand Park. Therefore, the project would not result in any secondary impacts on surrounding land uses, and impacts would be less than significant.

Regulatory Consistency
The purpose of the ESL Regulations (LDC Sections 143.0101 – 143.0160) is to protect, preserve, and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The project site does not include steep hillsides, or coastal bluffs, and is not located within the 100-year floodplain. However, the project site does contain ESL due to the presence of sensitive biological resources. As described in the discussion of potential impact to biological resources below, implementation of MM-BIO-1 and MM-BIO-2, as detailed in the project's Mitigation Monitoring Reporting Program (MMRP; Section VIII below), would reduce impacts to a level less than significant. These mitigation measures are consistent with OMCPU Final PEIR Mitigation Framework BIO-1. Therefore, the project would be consistent with the City's ESL Regulations.

The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. As described in the discussion of potential impact to historical resources below, there are no historic buildings, structures, or objects on the project site, and the Native American Heritage Commission (NAHC) records search of their Sacred Lands File was negative. Two prehistoric artifacts were identified during the field survey, consisting of one fine-grained porphyritic metavolcanic core and one fine-grained porphyritic metavolcanic flake. Because the project site is situated within the recorded boundary of P-37-007208 (see Historical Resources, below), there is a high possibility for the presence of surface cultural resources to occur on the project site. Therefore, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Implementation of MM-HIST-1 Archaeological Monitoring, as detailed in the MMRP (Section VIII below), would reduce impacts related to archaeological resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR Mitigation Framework HIST-1. Therefore, the project would be consistent with the City's Historical Resources Regulations.

As discussed in the OMCPU Final PEIR, all future projects implemented in accordance with the OMCP are required to incorporate measures into site plans in accordance with the City's Brush Management Regulations and Landscape Standards pursuant to General Plan and Community Plan policies intended to reduce the risk of wildfires. The project site's proximity to native vegetation in the undeveloped land to the east could present wildland fires as a significant threat. The project has been reviewed by the City's Fire Rescue Department and Landscape Planning and has been found consistent with all applicable polices and regulations. Compliance with policies and regulations would reduce the impacts related to exposure of people or structures to a significant risk of loss, injury, or death from wildland fires to less than significant. Impacts would be less than significant. No mitigation measures are required.

Environmental Plan Consistency
As described in the discussion of potential impact to biological resources below, implementation of Mitigation Framework BIO-1 and BIO-2, which require future projects to prepare a site-specific biological resources report, were implemented. The project site is not within or immediately adjacent to the MHPA. No impact related to biological resources environmental plan consistency would occur.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to land use, and identified Mitigation Framework LU-1a, LU-1b, and LU-2. In accordance with Mitigation Framework LU-1a and LU-1b, the project is being processed via a discretionary review. The project is not adjacent to the MHPA, and therefore Mitigation Framework LU-2 is not applicable to this project. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Visual Effects and Neighborhood Character

OMCPU Final PEIR

Public Views
Section 5.2 of the OMCPU Final PEIR provides an analysis of visual effects and neighborhood character impacts associated with the OMCPU. Potential impacts could result to the following: public views; alteration of the communities' visual character by introducing development that is incompatible with the scale and design of surrounding development; the alteration of the existing landform through grading; and through a negative visual appearance due to the loss, covering, or modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient.

The OMCPU Final PEIR concluded that implementation of the OMCP would not result in significant impacts to the existing or planned character of the area. The majority of the existing public views of canyons and mesas would be preserved under the OMCP and to prevent impacts to views of public resources, the OMCP included designating view corridors and gateways through plan policies and project design features. With compliance with the OMCP policies, as well as inclusion of these project design features, impacts to public views would be less than significant.

Compatibility
The OMCPU Final PEIR determined that impacts associated with compatibility with surrounding neighborhood character would be less than significant, as future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and OMCPU. The OMCPU Final PEIR determined that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the State Route 905 (SR-905) corridor within the Central District would transition over the next 30 years to a more urbanized, cohesive environment. The land use and development design guidelines and policies of the OMCP are intended to ensure that future development within the OMCP area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. Future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and OMCPU. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element would be subject to review in accordance with CPIOZ-A. Development proposals that do not comply with the CPIOZ-A supplemental regulations would be subject to discretionary review in accordance with CPIOZ-B. Therefore, impacts would be less than significant.

Landform Alteration
Impacts associated with landform alteration would be less than significant, as future development would be required to comply with the relevant land use and development regulations, grading ordinance, ESL regulations, and relevant land use and development design guidelines and policies of the General Plan and OMCPU. Impacts were determined to be less than significant.

Unique Physical Features
The OMCPU Final PEIR identified that the OMCP could result in a negative visual appearance due to the loss, covering, or modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient Future development would be required to comply with relevant development regulations, ESL regulations, and relevant land use and development design guidelines and policies of the General Plan and OMCPU. Therefore, impacts were determined to be less than significant. Overall, adherence to existing policies and regulations, as well as implementation of the OMCP policies would ensure that potential impacts would be below a level of significance.

Project

Public Views
The project site is located in an urbanizing environment, surrounded by an existing automobile auction site consisting of paved parking lots immediately to the south, existing industrial warehouses to the east, proposed commercial and residential uses to the north, and existing and proposed residential uses to the west. These existing and proposed uses obscure views from the project site. Additionally, there are no scenic amenities, such as public views of canyons and mesas, that are visible from the project site. Review of Figure 5.2-8 of the OMCPU Final PEIR determined that a view corridor is located immediately northeast of the project site at the intersection of Britannia Boulevard and Airway Road. However, the OMCPU Final PEIR stated that project sites near a "View Corridor through Industrial/Commercial" that consist of non-native grassland could be developed for Industrial uses. As described in greater detail in the biological resources section below, vegetation on the project site consists of non-native grassland (11.30 acres), disturbed land (26.31 acres), and developed land (0.05 acre). Additionally, the project has been designed with appropriate setbacks that would avoid blocking views through this view corridor, and would introduce landscaping on the northern project boundary adjacent to Airway Road that would improve the visual quality through this view corridor. Furthermore, this view corridor already includes existing industrial development along Airway Road located adjacent to the eastern boundary of the project site. The proposed driveway width deviation would not result in a public view impact. Therefore, the project would not change the existing character of the view corridor, would not block views through the corridor, would improve the aesthetic quality of view corridor through project landscaping. Impacts would be less than significant.

Compatibility
The project would comply with applicable land use and development design guidelines and policies of the OMCP which are intended to ensure that future development within the OMCP area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development. The project would be compatible with the scale and design of surrounding development, and impacts would be less than significant.

Review of Figure 3-3 of the OMCPU Final PEIR determined that the project site is located within the "Central District," which consists of a mix of undeveloped, industrial and commercial uses. The OMCPU Final PEIR determined that land uses within the Central District would transition over the next 30 years to a more urbanized, cohesive environment and that subsequent project compliance with visual quality guidelines would avoid impacts related to visual character. The project would be

consistent with the conclusion of the OMCPU Final PEIR because it would convert a vacant parcel consisting of non-native grassland and disturbed land to a fenced truck/trailer parking facility consistent with the character of the surrounding industrial land uses. Additionally, the project has been designed consistent with all applicable design guidelines of the OMCP. The project would include a temporary use as a parking facility, but would transition to be partially developed with a park consistent with the OMCP and General Plan designation. The proposed driveway width deviation would not result in any visual incompatibility. Therefore, the project would be consistent with surrounding development, and impacts would be less than significant.

Landform Alteration
The project site does not contain any unique physical features such as a natural canyon or natural hillside slopes. Although the project would alter more than 2,000 cubic yards of earth per graded acre, the project would not meet any of the conditions that would result in a significant impact related to landform alteration. There are no steep hillsides on the project site due to the gently to moderately sloping site topography, with elevations ranging from 495 to 515 feet above mean sea level. Similarly, the project would not require mass terracing of natural slopes. Furthermore, the project would not create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Therefore, the project would not project result in a substantial change in the existing landform or loss of unique physical features, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR determined that impacts related to visual effects and neighborhood character would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Air Quality

OMCPU Final PEIR

Section 5.3 of the OMCPU Final PEIR provides an analysis of air quality impacts associated with the CPU.

Plan Consistency
The OMCPU Final PEIR determined that development occurring as a result of implementing the OMCP would not obstruct or conflict with the implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portion of the State Implementation Plan, as the change in land uses under the OMCP and the traffic generated under the OMCP would result in fewer emissions than the adopted community plan upon which the current RAQS is based, resulting in a less than significant impact.

Criteria Pollutants
The OMCPU Final PEIR concluded that the OMCP could result in air quality impacts related to criteria pollutant emissions from construction and operation of a project within the OMCP area. The OMCPU Final PEIR included Mitigation Framework AQ-1, which would require best available control

measures/technology to be implemented during construction activities when construction emissions would exceed applicable thresholds, and Mitigation Framework AQ-2, which would require any future projects that significantly impact air quality to be conditioned with all reasonable mitigation to avoid, minimize, or offset the impact and to buffer sensitive receptors through the use of landscaping, open space or other techniques. However, the OMCPU Final PEIR determined that implementation of Mitigation Framework AQ-1 and AQ-2, as well as OMCP policies, would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts associated with criteria pollutant emissions would remain significant and unavoidable.

Sensitive Receptors
The OMCPU Final PEIR identified impacts to sensitive receptors associated with carbon monoxide hotspots and diesel particulate matter would be less than significant, as there would be no harmful concentrations of carbon monoxide and localized air quality emissions would not exceed applicable standards, and the chronic risks resulting from diesel exhaust emissions associated with the vehicles operating within and adjacent to the OMCP are projected to be less than significant and would not expose future residents or workers to significant cancer risk from traffic-generated diesel exhaust emissions.

The OMCPU Final PEIR determined that impacts associated with collocation of sensitive receptors with commercial and industrial uses could result in exposure of sensitive receptors to toxic air emissions, resulting in a significant impact. The OMCPU Final PEIR included Mitigation Framework AQ-3, which applies to projects that have the potential to emit toxic air emissions and Mitigation Framework AQ-4, which pertains to projects that contain certain facilities identified in Table 5.3-7 of the OMCPU Final PEIR, which, if located proximate to residential and other sensitive uses, that may expose sensitive receptors to toxic air emissions. However, this impact likewise would remain significant and unavoidable.

The OMCPU Final PEIR concluded that there are no known sources of specific, long-term odors within the community plan area, and that none of the identified land uses would typically be associated with the creation of objectionable odors. In addition, the OMCPU Final PEIR concluded that since the OMCP did not include any new sources of odor that would affect sensitive receptors (schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities), impacts associated with odors would be less than significant.

Project

Project-specific construction and operational air emissions were calculated using California Emissions Estimator Model (CalEEMod; RECON Environmental, Inc. [RECON] 2022a) to assess potential air quality impacts consistent with the OMCPU Final PEIR Mitigation Framework AQ-3.

Plan Consistency
The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD's) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The San Diego Air Board is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward

attaining the standards for ozone (O_3). The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the SANDAG in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. The entire project site is zoned International Business and Trade (IBT-1-1) in the City's Official Zoning Map. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park in the OMCP. The 16.77-net acre western half of the project site is designated as Park in the General Plan and OMCP. The western half is anticipated to be developed as Grand Park in 2042. The project would be a temporary use until the time that the City develops the park. The project would be consistent with the zoning and the land use designations of the eastern half of the project site; and although the western half of the project is designated as Park, the interim use of the site as a parking facility would not preclude the future development of the Grand Park. Emissions were calculated for the project as well as for a project that is consistent with the existing zoning and land use designations. Under the existing zoning and land use designation, the project site could be developed with a 16.75-acre park that would generate 20 trips per acre and a 340,000-square-foot industrial park use that would generate 16 trips per 1,000 square feet, for a total of 5,440 daily trips. The project would generate a maximum of 1,040 daily trips, which would be less than what would be generated compared to the existing designations. Therefore, emissions associated with the project would be accounted for in the RAQS. Further, emissions due to construction and operation of the project would be less than the applicable thresholds. Therefore, the project would be consistent with the growth projections and would not conflict with implementation of the RAQS.

Criteria Pollutants

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related emissions include fugitive dust from grading activities, equipment exhaust, trips, and power consumption. Construction emissions for the project were modeled assuming that construction would begin in 2023 and last for approximately six months. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Table 2 shows the total projected construction maximum daily emission levels for each criteria pollutant (RECON 2022a).

Table 2 Maximum Daily Construction Emissions (pounds per day)						
Year	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2023	4	35	29	<1	21	11
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Exceeds Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
SOURCE: RECON 2022a. NOTE: Totals may vary due to independent rounding.						

Development of the project would be required to comply with SDAPCD Rule 55, which identifies fugitive dust standards and is required to be implemented at all construction sites located within the San Diego Air Basin. Fugitive dust emissions were calculated using CalEEMod default values, which did not take into account the required dust control measures. Thus, the emissions shown in Table 2 are conservative. For assessing the significance of the air quality emissions resulting during construction of the project, the construction emissions were compared to the City significance thresholds shown in Table 2. As shown in Table 2, maximum daily construction emissions associated with the project are projected to be less than the applicable thresholds for all criteria pollutants. Construction related air quality impacts would be less than significant, and project construction would not result in emissions that would exceed the NAAQS or CAAQS, or contribute to existing violations, resulting in a less than significant impact. Also, the project would not result in the generation of 100 pounds per day or more of particulate matter. Standard dust control measures would be implemented as a part of project construction in compliance with SDAPCD Rule 55. Therefore, impacts would be less than significant.

Operations emissions generated by the project would come from area and energy sources (consumer products, landscape maintenance, architectural coatings, natural gas use, etc.), as well a mobile source (vehicle traffic). The project would generate a total of 1,040 average daily trips (ADT; Linscott, Law & Greenspan, Engineers [LLG] 2023). The default trip lengths in CalEEMod were modeled, which are based on data provided by air districts. Table 3 provides a summary of the operational emissions generated by the project (RECON 2022a). As shown, project-generated emissions are projected to be less than the City's Significance Determination Thresholds (City of San Diego 2022a) for all criteria pollutants. Therefore, project operation would not generate regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and impacts would be less than significant.

Table 3 Summary of Project Operational Emissions (pounds per day)						
Source	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	2	28	17	<1	8	2
Total	**3**	**28**	**17**	**<1**	**8**	**2**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

SOURCE: RECON 2022a.
NOTE: Totals may vary due to independent rounding.
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide
SO_X = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 microns or less

Sensitive Receptors

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The project does not include sensitive receptors. The closest sensitive receptors would include multi-family residential uses currently under construction immediately north of the eastern half of the project site (Silo at Epoca Apartments) and immediately west and southwest of the project site west of Airway Road (Otay Mesa Lumina). Additionally, existing single-family residential uses are located further to the northwest and southwest of the project site. Additionally, mixed-use commercial/residential development is planned for the undeveloped site immediately north of the western half of the project site. Construction of the project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction of the project would result in the generation of diesel exhaust diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site. Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were six months, the exposure would be less than 2 percent of the total exposure period used for health risk calculation. Based on the short duration of construction (6 months), DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the maximally exposed individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a hazard index greater than 1 for the maximally exposed individual. Additionally, with ongoing implementation of U.S. Environmental Protection Agency and California Air Resources Board (CARB) requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment have been substantially reduced. Furthermore, the project would implement standard construction measures in order to comply with mandatory SDAPCD rules and regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. Construction would be short-term and construction emissions would be well less than applicable

thresholds (see Table 2 above). Therefore, construction of the project would not expose sensitive receptors to substantial pollutant concentration, and impacts would be less than significant.

Once operational, trucks parking at the project site would be a source of DPM. However, all trucks would be required to comply with CARB's idling limit of five minutes. Once trucks have parked the engines would be turned off. When the trucks are turned on, they would immediately leave the project site. Therefore, the project would not expose the adjacent residential uses to significant DPM emissions. The project would be an interim use on both the western and eastern halves of the project site until the time that the City may develop Grand Park on the western half of the project site in 2042. Therefore, the project would not expose sensitive receptors using Grand Park to significant DPM emissions once it is developed because operations would cease on the eastern half of the project site. Therefore, operation of the project would not expose sensitive receptors to substantial levels of pollution, and impacts would be less than significant.

Odors

The project does not include any uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. The project proposes the operation of a truck/trailer parking facility, which is not included on CARB's list of facilities that are known to be prone to generate odors. During operation of the project, odors could be emitted from trucks maneuvering on-site and idling. However, all trucks would be required to comply with CARB's idling limit of five minutes, and these trucks would not produce a significant amount of odor. Consistent with City requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Therefore, the project is not expected to generate significant objectionable odors affecting a substantial number of people, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to air quality, and identified Mitigation Framework AQ-1 through AQ-4. Mitigation Framework AQ-1 requires best available control measures/technology to be implemented during construction activities when construction emissions would exceed applicable thresholds. The project would not result in construction emissions that exceed the applicable thresholds. Mitigation Framework AQ-2 requires future projects that significantly impact air quality to be conditioned with all reasonable mitigation. The project would result in less than significant impacts related to air quality. Mitigation Framework AQ-3, which applies to projects that have the potential to emit toxic air emissions and Mitigation Framework AQ-4, which pertains to projects that contain certain facilities identified in Table 5.3-7 of the OMCPU Final PEIR, are not applicable because the project would not result in the exposure of sensitive receptors to toxic air contaminants or construct facilities identified in Table 5.3-7. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Biological Resources

OMCPU Final PEIR

Section 5.4 of the OMCPU Final PEIR provides an analysis of biological resource impacts associated with the OMCP.

Sensitive Plants, Animals and Habitat
The OMCPU Final PEIR stated that implementation of the OMCP has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA. Specifically, impacts to Tier I, II, IIIA, and IIIB habitats were found to be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, non- native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Impacts to wetlands and other jurisdictional water resources would also be significant. Impacts to 17 species of sensitive plants would be potentially significant. Impacts to coastal California gnatcatcher, Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, San Diego horned lizard, Belding's orange-throated whiptail, western burrowing owl, coastal cactus wren, northern harrier, Cooper's hawk, golden eagle, least Bell's vireo, and southern California rufous-crowned sparrow would be potentially significant. Potential impacts to federal or state listed species, MSCP covered species, or species with a California Native Plant Society Rare Plant Ranking would be significant. In addition, the OMCPU Final PEIR concluded that future projects would be required to implement project level mitigation measures consistent with Mitigation Framework BIO-1, which requires site-specific biological surveys to determine the potential for sensitive species, along with the provision for the proposal for site-specific mitigation, if necessary, to reduce impacts to sensitive species or habitats. Specifically, OMCPU Final PEIR Mitigation Framework BIO-1 requires future projects to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl (*Athene cunicularia*; BUOW) habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed. Measures to avoid and minimize impacts to BUOW shall be included in a conceptual BUOW mitigation plan, which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts. Implementation of Mitigation Framework BIO-1 would reduce impacts to sensitive plants and animals to a less than significant.

The OMCPU Final PEIR determined that future projects within the OMCP area could result in significant impacts to sensitive habitat, specifically to Tier I, II, and IIIB habitat areas, which include maritime succulent scrub, native grassland, Diegan coastal sage scrub, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Implementation of OMCPU Final PEIR Mitigation Framework BIO-1 would reduce impacts to sensitive habitat to a level less than significant. Additionally, compliance with OMCPU polices and established development standards and regulations would reduce impacts to sensitive habitats to a level less than significant.

The OMCPU Final PEIR identified potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because any adjustments would be required to meet the equivalency criteria for approval. The OMCPU Final PEIR determined that MHPA adjacency impacts would be addressed at the project-level, and projects adjacent to MHPA areas would be required to comply with the MHPA Land Use Adjacency Guidelines and

implement Mitigation Framework LU-2, which would reduce MHPA adjacency impacts to a level less than significant. The OMCPU Final PEIR also determined that the OMCP would be consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact and the OMCP incorporates policies for adhering to the Management Directives, and no significant impacts relating to MSCP consistency would occur.

The OMCPU Final PEIR determined that there is a potential for temporary noise impacts to wildlife from construction and permanent noise impacts from the introduction of noise generating land uses adjacent to MHPA. Temporary and/or permanent noise impacts to wildlife within the MHPA would be significant. The OMCPU Final PEIR determined that impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the OMCP would be mitigated to a level less than significant with implementation of Mitigation Framework BIO-1 through BIO-4 and LU-2.

Migratory Wildlife
The OMCPU Final PEIR concluded that future development, including construction or extension of OMCP Mobility Element roadways, utility lines, and/or temporary construction activities within the MHPA, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss, and/or fragmentation. Any direct or indirect impacts to migratory wildlife nesting, foraging, and movement was determined to be significant. The OMCPU Final PEIR determined that potential impacts to migratory wildlife nesting, foraging, and movement within the MHPA would be mitigated through compliance with the MHPA Land Use Adjacency Guidelines implemented through Mitigation Framework LU-2. Implementation of this mitigation measure would ensure impacts would be less than significant. Additionally, the OMCPU Final PEIR included Mitigation Framework BIO-2, which required future projects to prepare site-specific biological resources surveys for projects that may impact areas within the MHPA. Implementation of Mitigation Framework BIO-2 would reduce impacts to less than significant. However, because the project is not located within or adjacent to the MHPA, Mitigation Framework LU-2 and BIO-2 would not apply.

MSCP
The OMCP was found to be consistent with the vision for the Otay Mesa MHPA, as the open space network would remain intact and the OMCP incorporates policies for adhering to the Management Directives. No significant impacts relating to MSCP consistency were identified.

The PEIR identified developments proposed adjacent to the MHPA could result in direct impacts to significant biological resources. To ensure avoidance or reduction of the potential MHPA impacts resulting from new development adjacent to the MHPA, future projects would be required to comply with Mitigation Framework LU-2 included in Section 5.1 (Land Use) of the CPU PEIR. This Mitigation Framework LU-2 reinforces compliance with the MHPA Land Use Adjacency Guidelines.

Invasive Plants
In regard to invasive plant impacts, the OMCPU Final PEIR determined that impacts could be potentially significant due to the introduction of invasive plants within the MHPA during future grading and development. The OMCPU Final PEIR determined that the introduction of invasive species into the MHPA would be addressed at the project level and mitigated through implementation of Mitigation Framework LU-2, thereby reducing impacts to a level less than significant.

Wetlands
The OMCPU Final PEIR concluded that future projects implemented in accordance with the OMCP may result in significant impacts to wetlands, vernal pools and vernal pool species, as well as both wetland and non-wetland streambed waters regulated by the U.S. Army Corps of Engineers (ACOE), California Department of Fish and Wildlife (CDFW), and the City, and would thus require a deviation from the ESL Regulations. The OMCPU Final PEIR determined that future projects implemented in accordance with the OMCP, which cannot demonstrate compliance with CPIOZ-A because impacts to wetlands/jurisdictional resources cannot be avoided would be required to implement Mitigation Framework BIO-4, which would reduce impacts to wetlands to a level less than significant.

Project

Consistent with OMCPU Final PEIR Mitigation Framework BIO-1, a site-specific Biological Technical Report was prepared by Alden Environmental, Inc. (Alden 2022). The site-specific Biological Technical Report utilized a 37.66-acre Biological Study Area (BSA) that is synonymous with the project's net acreage to the existing ROW. Therefore, the BSA is larger than, and encompasses, the 32.55-acre project site, which equals the net acreage as a result of the ultimate ROW. Alden performed searches of CDFW's California Natural Diversity Database and the U.S. Fish and Wildlife Service (USFWS) database for information regarding sensitive species known to occur within approximately 0.25-mile of the BSA. Alden also conducted a vegetation mapping and biological resources assessment (including a Quino checkerspot butterfly (*Euphydryas editha quino*) habitat assessment), a focused survey for the BUOW, and a focused Otay tarplant (*Deinandra conjugens*) survey. Historic aerials of the BSA were also reviewed. Review of historic aerial imagery determined that the BSA consists of land that was in agricultural production as far back as 1953 and was left fallow sometime in the 1990s.

Sensitive Plants, Animals and Habitat
No sensitive plant species were observed within the BSA. All sensitive and MSCP Narrow Endemic plant species that were not observed are either not expected or have low potential to occur. Therefore, impacts to sensitive plant species are not anticipated. The BSA supports one upland vegetation community and two land cover type. Table 4 presents the acreages of this vegetation community and land cover type.

Table 4
Existing Vegetation Communities within the Biological Survey Area

Vegetation Communities (Oberbauer 2008)	Acreage
Non-Native Grassland (Tier IIIB)	11.30
Disturbed (Tier IV)	26.31
Developed (No Tier)	0.05
TOTAL	**37.66**
SOURCE: Alden 2022.	

The entire 37.66-acre BSA would be directly and permanently impacted. Table 5 presents the impact acreages within the BSA. According to the City's Biology Guidelines (City of San Diego 2018), lands designated as Tier IV are not considered to have significant habitat value, and impacts would not be

considered significant. Therefore, mitigation would not be required. According to the City's Biology Guidelines (City of San Diego 2018), lands containing Tier IIIB habitats are considered sensitive and declining. Therefore, impacts to 11.30 acres of Tier III-B non-native grassland would be considered significant and require mitigation. Implementation of MM-BIO-1 Non-Native Grassland (see Section VIII) would reduce this impact to a level less than significant. MM-BIO-1 would be consistent with OMCPU Final PEIR Mitigation Framework BIO-1.

Table 5
Impacts to Existing Vegetation Communities within the Biological Survey Area

Vegetation Communities (Oberbauer 2008)	Impact Acreage
Non-Native Grassland (Tier IIIB)	11.30
Disturbed (Tier IV)	26.31
Developed (No Tier)	0.05
TOTAL	**37.66**
SOURCE: Alden 2022.	

The BSA was determined to have minimal potential for the Quino checkerspot butterfly during the habitat assessment. The BUOW, which is considered to have moderate potential to occur, was not found nor was evidence of BUOW use/occupation of the site found. However, one California Natural Diversity Database (CNDDB) record for the BUOW dating back to 2005 was identified approximately 0.1 mile southeast of the intersection of Otay Mesa Road and Cactus Road, and the species is presumed extant in that location. Therefore, the potential exists for the BUOW to occupy the BSA prior to construction, and any impact to occupied habitat would be considered a significant impact. Implementation of MM-BIO-2 Burrowing Owl would reduce this impact to a level less than significant. MM-BIO-2 would be consistent with OMCPU Final PEIR Mitigation Framework BIO-1.

One sensitive animal species, red diamond rattlesnake (*Crotalus ruber*), was observed in non-native grassland in the northwestern portion of the BSA. Removal of non-native grassland would result in a loss of habitat for red diamond rattlesnake. Additionally, potential injury or mortality could occur to the species during construction activity. This would be considered a significant impact. Implementation of MM-BIO-1 Non-Native Grassland (see Section VIII) described above would secure comparable habitat for the species, and at the ratio required, per the City's Biology Guidelines, and reduce this impact to a level less than significant. MM-BIO-1 would be consistent with OMCPU Final PEIR Mitigation Framework BIO-1.

Migratory Wildlife
The BSA is surrounded by existing development, which severely limits, or even precludes connections to any surrounding potential habitat areas. The site may provide some resources such as food for wildlife, but due to its history of agricultural and mechanical disturbance, those resources are of low quality and limited. Therefore, the project would not interfere substantially with wildlife movement or a wildlife corridor, and impacts would be less than significant.

MSCP
MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are

considered by the City to be a sensitive biological resource. The BSA is not within or immediately adjacent to the MHPA. No impact would occur.

Invasive Plants
The project would remove all vegetation within the BSA during construction (most of which is comprised of non-native species) and would not introduce invasive or exotic species. Furthermore, the BSA is not within or immediately adjacent to the MHPA. No impact would occur.

Wetlands
No Waters of the U.S. or Waters of the State were observed on-site. Additionally, no City Wetlands were observed on-site. No impact would occur.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to biological resources, and identified Mitigation Framework BIO-1 through BIO-4. Consistent with OMCPU Final PEIR Mitigation Framework BIO-1, a site-specific Biological Technical Report was prepared for the project. Implementation of MM-BIO-1 (Non-Native Grassland) would reduce impact on sensitive habitats (non-native grasslands) to a level less than significant. Similarly, implementation of MM-BIO-2 (Burrowing Owl) would reduce impacts on sensitive species (burrowing owls) to a level less than significant. MM-BIO-1 and MM-BIO-2 are both consistent with OMCPU Final PEIR Mitigation Framework BIO-1. The project would not interfere substantially with wildlife movement or a wildlife corridor. Consequently, OMCPU Final PEIR Mitigation Framework BIO-2 does not apply to the project. The BSA is not within or immediately adjacent to the MHPA. The project would remove all vegetation from the BSA during construction (most of which is comprised of non-native species) and would not introduce invasive or exotic species. Consequently, the project would not impact the MHPA or introduce invasive species, and OMCPU Final PEIR Mitigation Framework LU-2 would not apply to the project. The project would not impact any wetlands. Consequently, OMCPU Final PEIR Mitigation Framework BIO-4 does not apply to the project. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Historical Resources

OMCPU Final PEIR

Section 5.5 of the OMCPU Final PEIR provides an analysis of historical resource impacts associated with the OMCP.

Prehistoric or Historical Impacts
The OMCPU Final PEIR determined that future development would have the potential to significantly impact all or a portion of the previously identified recorded prehistoric or historic sites within the OMCP area. The OMCPU Final PEIR stated that future discretionary development projects that could result in a potentially significant impact to archaeological resources, as well as religious or sacred sites, and would be required to implement Mitigation Framework HIST-1 to address impacts associated with archaeological resources.

Human Remains
Although the OMCPU Final PEIR determined that there are no known human remains in the OMCPU area, human remains may exist below the ground surface that could be unearthed during future development. Unearthing of unknown human remains would be considered a significant impact. The OMCPU Final PEIR stated that future discretionary projects that would have the potential to impact religious or sacred sites or human remains would be required to implement Mitigation Framework HIST-1.

Project

Consistent with OMCPU Final PEIR Mitigation Framework HIST-1, a site-specific Historical Resources Survey was prepared by RECON (RECON 2022b). A records search with a one-mile radius buffer around the project site was completed at the South Coastal Information Center at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources occur on the project site. Historic aerial photographs and topographic maps were reviewed to determine changes in the survey area over time.

Prehistoric or Historical Impacts
The records search indicated that 105 cultural resource investigations have occurred within a one-mile radius of the project site. Sixty-eight cultural resources occur with a one-mile radius of the project, including 47 prehistoric resources (10 of which are isolated artifacts), 20 historic resources, and 1 multi-component resource. The prehistoric resources consist of lithic scatters, lithic and shell scatters, hearths, a bedrock milling feature, and a secondary deposit. The historic resources consist of a military runway, a roadway, a church with associated cemetery, and a farmstead. The multicomponent site consists of a lithic scatter that also exhibit historic foundations, a cistern, and trash scatters.

One previously recorded cultural resource occurs within the project site. P-37-007208 is a prehistoric lithic scatter that presently incorporates 740 acres, including the project area. The initial recording of P-37-007208 in 1979 covered 80 acres; however, the site has since been updated eight times and has expanded in all cardinal directions. The P-37-007208 artifact assemblage has been consistent across all updates, consisting of lithic debitage and tools, with a light to medium scatter density. Portions of P-37-007208 have been tested and have been identified as not significant.

The adjacent property to the south, the Britannia 40 Otay Project—a 39-acre parcel—was surveyed by Affinis in 2008 noting two fine-grained metavolcanic flakes found in a dirt road along the northern boundary of the project; however, ground surface visibility was impeded by vegetation cover. The project was monitored during grading operations by Affinis in 2009–2010 and recovered 287 artifacts from a low-density lithic scatter, which included ground stone, choppers, scraper planes, scrapers, cores, hammerstones, retouched/utilized flakes, rejuvenation flakes, and debitage.

A letter was sent to the NAHC on December 9, 2021, requesting them to search their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity. A response letter from the NAHC was received on February 4, 2022, indicating the results of the Sacred Lands File search for the project site was negative. The NAHC provided a list of twenty Native American contacts who may have an interest in the project. On April 28, 2022, RECON sent letters to

these twenty contacts informing them of the project and inquiring whether they would have any concerns regarding Native American issues or interests. As of the response deadline of May 19, 2022, only one response was received. The Viejas Band of Kumeyaay Indians determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the area of potential effect of the project. Therefore, the Viejas Band requested that a Kumeyaay cultural monitor be on-site for ground disturbing activities and to be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

The project site was also surveyed on December 6, 2021, by RECON archaeologist Nathanial Yerka, who was accompanied by Native American monitor Shuluuk Linton of Red Tail Environmental. Two prehistoric artifacts were identified during the field survey, consisting of one fine-grained porphyritic metavolcanic core and one fine-grained porphyritic metavolcanic flake. The field survey noted evidence of past disturbance such as agriculture, construction of drainages, various grading and pit excavations, and soil infilling. Although the field survey found minimal cultural material, most of the project site exhibited dense ground cover and vegetation waste that hindered the possible observance of surface cultural material. Furthermore, because the project site is situated within the recorded boundary of P-37-007208, there is a high possibility for the presence of surface cultural resources to occur on the project site. Therefore, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Implementation of MM-HIST-1 Archaeological Monitoring would reduce impacts to a level less than significant. MM-HIST-1 would be consistent with OMCPU Final PEIR Mitigation Framework HIST-1.

There are no historic buildings, structures, or objects on the project site. Therefore, OMCPU Final PEIR Mitigation Framework HIST-2 would not apply.

Human Remains
No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to historical resources, and identified Mitigation Framework HIST-1 and HIST-2. Consistent with OMCPU Final PEIR Mitigation Framework HIST-1, a site-specific Historical Resources Survey was prepared for the project. Excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Implementation of MM-HIST-1 (Archaeological Monitoring) would reduce impacts to a level less than significant. MM-HIST-1 would be consistent with OMCPU Final PEIR Mitigation Framework HIST-1. There are no historic buildings, structures, or objects on the project site. Therefore, OMCPU Final PEIR Mitigation Framework HIST-2 would not apply. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Human Health/Public Safety/Hazardous Materials

OMCPU Final PEIR

Section 5.6 of the OMCPU Final PEIR provides an analysis of health and safety/hazardous materials impacts associated with the OMCP

Wildfire Hazards
The OMCPU Final PEIR found that future development projects that would implement the OMCP would have the potential to result in significant impacts related to wildland fires requiring implementation of Mitigation Framework HAZ-1 to reduce impacts related to wild land fires to below a level of significance. Mitigation Framework HAZ-1 requires future projects to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and OMCP policies intended to reduce the risk of wildfires. In addition, Mitigation Framework HAZ-1 sets forth that future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.

Aircraft Hazards
The OMCPU Final PEIR found that future development projects associated with the OMCP would have the potential to result in significant impacts related to airport operations at the Abelardo L. Rodriguez International Airport and Brown Field Municipal Airport and identified Mitigation Framework HAZ-2 to reduce impacts. Mitigation Framework HAZ-2 requires that the City inform project applicants for future development concerning the existence of the Part77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. Mitigation Framework HAZ-2 also requires the City to inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. It also prohibits the City from approving ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Lastly, Mitigation Framework HAZ-2 states the City shall not recommend approval of subsequent development projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill State and Airport Land Use Commission (ALUC) requirements. With implementation of Mitigation Framework HAZ-2, the PEIR identified potential future project aircraft hazards impacts would be reduced to below a level of significance.

Hazardous Substances
The OMCPU Final PEIR concluded that impacts associated with hazardous substances would be less than significant, as future projects within the OMCP area would be required to comply with policies contained in the General Plan, the OMCP, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency, Resource Conservation and Recovery Act, California Department of Health Services, County of San Diego Department of Environmental Health, and Caltrans. In addition, the OMCP designated truck routes within the OMCP area along with roadway improvements in conjunction with buildout of the circulation network, which would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Compliance with existing regulations would ensure impacts associated with health hazards and hazardous substances remain less than significant.

The OMCPU Final PEIR determined that impacts associated with hazardous sites would be potentially significant. Section 5.6.1.2 of the OMCPU Final PEIR identified six sites within the OMCPU area as containing hazardous materials, which would present a significant hazard to the public or the environment. None of these sites are located within or adjacent to the project site. In addition, the OMCPU Final PEIR determined that the presence of unknown hazardous sites within the OMCP could result in significant impacts to future development within the OMCP area. OMCPU Final PEIR Mitigation Framework HAZ-3 requires projects that may be affected by hazardous materials to prepare a Phase I Environmental Site Assessment (ESA) and implement remediation activities if determined necessary, which would reduce impacts related to hazardous materials sites to a level less than significant.

Project

Wildfire Hazards
The project site is located within a designated Very High Fire Hazard Severity Zone, per the City Official Very High Fire Hazard Severity Zone Map. However, the project has been designed consistent with all brush management and landscaping regulations intended to reduce the risk of wildfires as required by OMCPU Final PEIR Mitigation Framework HAZ-1. Furthermore, San Diego Fire-Rescue Department Station 43 is located approximately 1.1 miles northeast of the project site, which would provide immediate emergency response in the event of a wildfire. Therefore, the project would not expose people to substantial risk associated with wildfires, and impacts would be less than significant.

Aircraft Hazards
Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is located within Zone 6 Traffic Pattern Zone. Industrial uses are considered compatible within Zone 6. The project site is located within the Airport Influence Area-Review Areas 1 and 2 for Brown Field Municipal Airport, and within the FAA Part 77 Notification Area for Brown Field Municipal Airport. However, the proposed trailers would not exceed applicable height limits for these zones and would not create a hazard related to air navigation. Consequently, the project is not required to submit a FAA Part 77 Notification, and OMCPU Final PEIR Mitigation Framework HAZ-2 does not apply to the project. Therefore, the project would not result in a safety hazard for people working within a designated airport influence area, and impacts would be less than significant.

Hazardous Substances
There are no existing or proposed schools located within 0.25 mile of the project site. Project construction may require the use of small amounts of common solvents and petroleum products. However, these materials would not be acutely hazardous, and use in small quantities would not result in a significant hazard to the public or environment. Operation of the project would consist of a truck/trailer parking facility that would not include uses such as gasoline service stations or automobile repair facilities that would require the routine transport, use or disposal of hazardous materials. The project would implement standard best management practices (BMPs) during cleaning and maintenance activities to ensure that all hazardous materials are handled and disposed of properly. Therefore, impacts associated with handling of hazardous materials would be less than significant.

City staff review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control Envirostor databases determined that there are no contaminated sites on or adjacent to the project site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. Consequently, the project is not required to prepare a Phase I ESA, and OMCPU Final PEIR Mitigation Framework HAZ-3 does not apply to the project. Therefore, the project would not be located on a site listed on a hazardous materials database, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to human health, public safety, and hazardous materials, and identified Mitigation Framework HAZ-1 through HAZ-3. The project has been designed consistent with all brush management and landscaping regulations intended to reduce the risk of wildfires as required by OMCPU Final PEIR Mitigation Framework HAZ-1. Furthermore, San Diego Fire-Rescue Department Station 43 is located approximately 1.1 miles northeast of the project site, which would provide immediate emergency response in the event of a wildfire. The proposed trailers would not exceed applicable height limits for Airport Influence Area-Review Areas 1 and 2 for Brown Field Municipal Airport and would not create a hazard related to air navigation. Consequently, the project is not required to submit a FAA Part 77 Notification, and OMCPU Final PEIR Mitigation Framework HAZ-2 does not apply to the project. Review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control Envirostor databases determined that there are no contaminated sites on or adjacent to the project site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. Consequently, the project is not required to prepare a Phase I ESA, and OMCPU Final PEIR Mitigation Framework HAZ-3 does not apply to the project. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Hydrology and Water Quality

OMCPU Final PEIR

Section 5.7 of the OMCPU Final PEIR provides an analysis of hydrology and water quality impacts associated with the OMCP.

Hydrology (Runoff, Natural Drainage Systems, and Flow Alterations)
The OMCPU Final PEIR identified impacts associated with runoff that would result in significant direct and indirect impacts due to an increase in impervious surfaces and associated increases in runoff, and the alterations of on- and off-site drainage patterns. OMCPU Final PEIR Mitigation Framework HYD/WQ-1 requires regulatory compliance with the Storm Water Standards Manual. Future projects would be required to implement Mitigation Framework HYD/WQ-1 to reduce impacts associated with runoff to a level less than significant.

The OMCPU Final PEIR determined that impacts to natural drainage systems would be potentially significant, as buildout in accordance with the OMCP has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. OMCPU Final

PEIR Mitigation Framework HYD/WQ-1requires future projects to demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and Regional Water Quality Control Board (RWQCB) regulations. Regulatory compliance with the City's Storm Water Standards Manual and RWQCB regulations is typically achieved through preparation of a storm water quality management plan would reduce impacts to natural drainage systems to a level less than significant.

The OMCPU Final PEIR concluded that impacts associated with flow alteration would be potentially significant, as future development within the OMCP area would potentially impact the existing course and flow of flood waters due to the presence of floodplains within the OMCP area. OMCPU Final PEIR Mitigation Framework HYD/WQ- requires regulatory compliance with the Storm Water Standards Manual, which would reduce impacts associated with flow alteration to a level less than significant.

Water Quality
The OMCPU Final PEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the OMCP could result in discharges to surface water or groundwater. Grading and exposed soil could result in sedimentation. Residential development could result in the discharge of sediment, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Industrial operations are known to be a source of heavy metals, oily wastes, and various other substances dependent on the specific industrial operation. Projects would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP). Development of parks, schools, roads, and other public infrastructure would contribute to any of the identified pollutants noted above. OMCPU Final PEIR Mitigation Framework HYD/WQ-2 requires future projects to be sited and designed to minimize impacts on receiving waters, which would reduce impacts associated with water quality to a level less than significant.

Project

Consistent with the OMCPU Final PEIR Mitigation Framework HYD/WQ-1, HYD/WQ-2, and City regulations, a site-specific Storm Water Quality Management Plan (SWQMP) and Preliminary Drainage Study were completed by K&S Engineering (K&S; 2022a and 2022b).

Hydrology (Runoff, Natural Drainage Systems, and Flow Alterations)
There currently are no storm drain facilities on the property. Existing on-site drainage consists of natural sheet flows towards two drainage areas. One sheet flows southeast into an existing channel located along Britannia Boulevard. The second drainage area is located at the northwest corner of the project site and sheet-flows in a northwestern direction towards the southeast corner of the intersection of Airway Road and Cactus Road. Additionally, a small portion of Cactus Road drains south. The SWQMP determined that development of the project would convert 8.13 acres of the project site to impervious surfaces (K&S Engineering 2022a). The main parking area would be a pervious surface consisting of nine inches of recycled Class II Base. In order to address this increase of impervious surfaces, the project would install three biofiltration basin for the purpose of water quality, hydromodification, and peak flow detention. Two biofiltration basins would be located along the western half of the southern project boundary, and the third biofiltration basin would be located in the northwestern corner of the project site. The project would install a modular wetlands system with curb opening in the southwest corner of the project site, as well as green street swales located

along Britannia Boulevard, Airway Road, and Cactus Road. The project would also introduce an underground system of storm drainpipes and inlets to convey runoff to the existing points of compliance (POC) located in the northwest and southeast corners of the project site that would be retained. To address off-site drainage deficiencies southeast of the project site, the project would replace the existing 30-inch reinforced concrete pipe (RCP) within the ROW of Britannia Boulevard with a double 30-inch RCP that would be installed at a steeper slope gradient compared to the existing condition. The project would also be subject to conditions detailing the requirements for the detention analysis to demonstrate no increase to peak flows and upgrades to the deficient receiving conveyance system downstream of the project that will require collaboration with the Stormwater Department.

The Preliminary Drainage Report utilized the rational method hydrology program CIVILCADD/ CIVILDESIGN which is based on the City of San Diego Drainage Design Manual, to document that project would reduce flow rates under the 5-, 10-, 25-, and 50-year storm events as follows:

POC 1 (Southeast Corner of Project Site)

- Reduce the 5-Year flow rate from 23.55 cubic feet per second (cfs) in the existing condition to 22.44 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 25.25 cfs in the existing condition to 23.76 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 28.03 cfs in the existing condition to 26.50 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 32.10 cfs in the existing condition to 30.22 cfs in the post-project condition (K&S Engineering 2022b).

POC 2 (Northwest Corner of Project Site)

- Reduce the 5-Year flow rate from 4.18 cfs in the existing condition to 2.16 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 4.92 cfs in the existing condition to 2.54 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 5.55 cfs in the existing condition to 2.86 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 6.45 cfs in the existing condition to 3.33 cfs in the post-project condition (K&S Engineering 2022b).

Cactus Road

- Reduce the 5-Year flow rate from 0.54 cfs in the existing condition to 0.24 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 0.61 cfs in the existing condition to 0.28 cfs in the post-project condition.

- Reduce the 25-Year flow rate from 0.65 cfs in the existing condition to 0.31 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 0.72 cfs in the existing condition to 0.36 cfs in the post-project condition (K&S Engineering 2022b).

Therefore, as required by OMCPU Final PEIR Mitigation Framework HYD/WQ-1, the project demonstrates that is would be sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations. The project would not result in a substantial increase in runoff, substantial alteration of on-site or off-site drainage patterns, or off-site erosion and sedimentation, and impacts would be less than significant.

Water Quality
According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). Five infiltration tests were conducted which determined that infiltration rates ranged from 0.027 to 0.0027 per hour. Based on the results of the field infiltration tests, full or partial infiltration should be considered infeasible (GEOCON 2021). Therefore, the project proposes to utilize three biofiltration basins, a modular wetlands system with curb opening in the southwest corner of the project site, as well as green street swales located along Britannia Boulevard, Airway Road, and Cactus Road. The SWQMP identified 12 Drainage Management Areas (DMAs). DMAs 1, 2 and 3 would consist of approximately 80 percent of the project site comprising the truck parking area and the majority of the office trailers. DMA 1 would drain to biofiltration basin BMP 1 proposed along the southern project boundary. DMA 2 would drain to biofiltration basin BMP 2 proposed along the southern project boundary immediately west of biofiltration basin BMP 1. DMA 3 would drain to biofiltration basin BMP 3 proposed in the northwest corner of the project site. DMAs 4, 5, and 6 would be landscaped self-mitigating areas draining onto Britannia Boulevard and Airway Road. Therefore, no BMP would be required for DMAs 4, 5, and 6. DMA 7 would be conveyed to the modular wetland system in the southwest corner of the project site. DMAs 8 through 12 would consist of the public street improvements, which would drain to the green street swales located along Britannia Boulevard, Airway Road, and Cactus Road. As described above, the project would reduce peak flows under the 5-, 10-, 25-, and 50-year storm event compared to the existing condition, and the project would prevent off-site erosion or sedimentation by retaining the existing on-site drainage pattern. Additionally, the site-specific SWQMP prepared by K&S Engineering (2022a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual. Therefore, as required by OMCPU Final PEIR Mitigation Framework HYD/WQ-2, the project would be sited and designed to minimize impacts on receiving waters. The project would not result in increases in pollutant discharges, including downstream sedimentation, and impacts would be less than significant.

As described in the Biological Resources section above, there are no jurisdiction drainages or wetlands on-site. Therefore, the project would not require permits from the RWQCB or ACOE under federal CWA Section 401 or 404. The project site is located approximately 8.3 miles inland from the coast, with elevations ranging from approximately 495 to 515 feet above mean sea level. Therefore,

the risk of tsunami is negligible due to the distance from the ocean and elevation. There would be no risk from a seiche, as the site is not located near a large body of water, such as a lake.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to hydrology and water quality, and identified Mitigation Framework HYD/WQ-1 and HYD/WQ-2. Consistent with the OMCPU Final PEIR Mitigation Framework HYD/WQ-1, HYD/WQ-2, and City regulations, a site-specific SWQMP and Preliminary Drainage Study were completed by K&S Engineering (K&S; 2022a and 2022b). Consistent with the requirements of Mitigation Framework HYD/WQ-1, the project would not result in a substantial increase in runoff, substantial alteration of on-site or off-site drainage patterns, or off-site erosion and sedimentation. With implementation of the requirements of Mitigation Framework HYD/WQ-2, the project would not result in increases in pollutant discharges, including downstream sedimentation. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Geology/Soils

OMCPU Final PEIR

Section 5.8 of the OMCPU Final PEIR provides an analysis of geology and soils impacts associated with the OMCP.

Geologic Hazards
The OMCPU Final PEIR determined that the OMCPU is within a moderate to high geologic risk area and could therefore result in the exposure of persons or structures to seismic events associated with fault. Faults within the immediate OMCPU area are generally considered to comprise the La Nación Fault Zone. Faults in this zone are considered to be potentially active and would subject the OMCP area to moderate to severe ground shaking, resulting in a potentially significant impact. Regarding compressible soils, the OMCPU Final PEIR determined that portions of the OMCP area are underlain by undocumented fill, colluvium/topsoil, and alluvium, which are typically lose, dry, and contain rubble and are considered compressible. For future projects underlain by compressible soils, removal and replacement by compacted fill would be required. Regarding expansive soils, the OMCP area contains clay mudstone strata within the Very Old Paralic Deposits that exhibit a high to very high expansion potential, which occur over the majority of the OMCP area, resulting in a potentially significant impact. No significant impacts were identified for potential rockfall hazards, and no rock stabilization or blasting would be required for future projects within the OMCP area. OMCPU Final PEIR Mitigation Framework GEO-1 requires preparation of a site-specific geotechnical report recommending project-specific engineering design measures that would reduce potential impacts related to geologic hazards to a level less than significant.

Erosion
The OMCPU Final PEIR determined that impacts associated with erosion would be potentially significant, due to the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the OMCP area, particularly in

conjunction with some portions of the San Diego Formation and in drainages and stream valleys. OMCPU Final PEIR Mitigation Framework GEO-2 requires preparation of a site-specific geotechnical report to ensure that projects adhere to the Grading Regulation and National Pollutant Discharge Elimination System permit requirements. Implementation of Mitigation Framework GEO-2 would reduce impacts associated with erosion to a level less than significant.

Project

Consistent with OMCPU Final PEIR Mitigation Framework GEO-1 and City regulations, a site-specific Geotechnical Investigation was prepared for the project by GEOCON, Inc. (GEOCON 2021).

Geologic Hazards
Review of the City's *Seismic Safety Study, Geologic Hazards and Faults*, 2008 Edition, Sheet 4, determined that the project site is designated as Hazard Category 53: *Level or Sloping Terrain, unfavorable geologic structure, low to moderate risk*. The Geotechnical Investigation determined that there are no mapped Quaternary faults crossing or trending toward the property, and the project site is not located within an established Alquist-Priolo Earthquake Fault Zone. No active faults are known to exist at the site. Therefore, the risk associated with fault rupture is considered low. Site topography is gently to moderately sloping, with elevations ranging from 495 to 515 feet above mean sea level. Additionally, review of published geologic maps during preparation of the Geotechnical Investigation determined there were no mapped landslide areas on or adjacent to the project site. Therefore, risks associated with landslides are considered low. The Geotechnical Investigation also determined that risk associated with liquefaction is considered low due to the dense nature of soils underlying the project site, proposed grading, and lack of permanent shallow groundwater. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts would be reduced to an acceptable level of risk. Impacts would be less than significant.

The Geotechnical Investigation determined that the undocumented fill and topsoil are unsuitable in their present condition to receive additional fill soil or settlement-sensitive structures and would require removal and replacement with properly compacted fill. While the underlying terrace deposits are suitable for support of structural improvements, the upper clay portion of the terrace deposits (as well as the topsoil) is highly expansive. Therefore, the Geotechnical Investigation recommended that the terrace deposit clay be undercut to a depth of 5 feet below finish pad grade or 3 feet below footings (whichever results in a deeper excavation). The site should then be capped with at least 5 feet of low to medium expansive soil. This will likely require mining the granular layer of the terrace deposits for use as a pad capping material and to provide an area for burial of expansive clays. Adherence to this recommendation would ensure that impacts related to expansive soils would be reduced to a level less than significant. Furthermore, adherence to all recommendations presented in the Geotechnical Investigation would ensure that the potential impacts related to geologic hazards would be reduced to an acceptable level of risk, therefore impacts would be less than significant.

Erosion
Regarding erosion, the site-specific SWQMP prepared by K&S Engineering (2022a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards

Manual. Furthermore, the project would adhere to the requirements of the City's grading regulations and National Pollutant Discharge Elimination System (NPDES) permit consistent with the requirements of OMCPU Final PEIR Mitigation Framework GEO-2. Therefore, impacts related to erosion would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to geology and soils, and identified Mitigation Framework GEO-1 and GEO-2. Consistent with OMCPU Final PEIR Mitigation Framework GEO-1 and City regulations, a site-specific Geotechnical Investigation was prepared for the project. Adherence to recommendations in the site-specific Geotechnical Investigation, as well as implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts would be reduced to an acceptable level of risk. The project would prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual, and would adhere to the requirements of the City's grading regulations and NPDES permit consistent with the requirements of OMCPU Final PEIR Mitigation Framework GEO-2, to reduce impacts to a level less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Energy Conservation

OMCPU Final PEIR

Section 5.9 of the OMCPU Final PEIR provides an analysis of energy conservation impacts associated with the OMCP. Energy use associated with a project typically includes fuel (gasoline and diesel), electricity, and natural gas, and sources include:

- Construction-related vehicle and equipment energy use
- Transportation energy use from people traveling to and from the project area during operation
- Building and facility energy use of the proposed project during long-term operation

The applicable regulations related to energy conservation include, but are not limited to, the California Code of Regulations (CCR; Title 24), the OMCPU Urban Design and Conservation Elements, and the Climate Action Plan (CAP).

The CCR, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance are the California Building Code energy efficiency and green building standards (CALGreen). The CCR, Title 24, Part 6 is the Energy Efficiency Standards. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The current version of the Energy Code, known as the 2019 Title 24, or the 2016 Energy Code, became effective January 1, 2020. The CCR, Title 24, Part 11 is known as CALGreen. CALGreen institutes

mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The OMCPU Urban Design and Conservation Elements build on the City's General Plan Urban Design and Conservation Elements with policies tailored to the conditions in Otay Mesa. Policies related to energy conservation include planning for energy efficiency through street orientation, building placement, and the use of shading in subdivisions and development plans; encouraging businesses and property owners to conduct energy audits and implement retrofits to improve the energy and efficiency of existing buildings; and incorporating energy saving technology in truck parking areas to reduce idling.

The City's CAP outlines the actions that the City will undertake to achieve its proportional share of state GHG emissions reductions. The CAP includes strategies to reduce citywide GHG emissions. Strategies 1 through 3 are relevant to energy conservation. Strategy 1, Water & Energy Efficient Buildings, includes goals and actions to reduce building energy consumption. Strategy 2, Clean & Renewable Energy, includes goals and actions to achieve 100 percent renewable energy citywide by 2035. Strategy 3, Bicycling, Walking, Transit & Land Use, includes goals and strategies to increase the use of mass transit, increase bicycling and walking opportunities, reduce vehicle fuel consumption, and promote effective land use patterns to reduce vehicle miles traveled. Note that the City had not yet adopted a CAP when the OMCPU was approved.

San Diego Gas and Electric is the owner and operator of natural gas and electricity transmission and distribution infrastructure in San Diego County. The OMCPU Final PEIR concluded that impacts associated with energy conservation would be less than significant, as implementation of the OMCP would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the OMCP. In addition, the OMCPU Final PEIR concluded that implementation of the OMCP would not be anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities (i.e., electricity and natural gas lines), which would create physical impacts. Additionally, future projects would be required to comply with the OMCP Urban Design Element which contains a list of Climate Change and Sustainable Development Policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design (Policy 4.9-1), incorporating environmentally conscious building practices and materials (Policy 4.9-2), minimizing building heat gain and appropriately shading windows (Policy 4.9-3), providing on-site landscaping improvements that minimize heat gain and provide attractive and context sensitive landscape environments (Policy 4.9-4), and ensuring development integrates storm water BMPs on-site (Policy 4.9-5). Based on the program-level analysis of the OMCP, state and local mandates for energy conservation, and the energy reduction measures set forth in the OMCP policies outlined above. Impacts associated with energy use would be less than significant.

Project

Energy used during construction of the project would not be considered significant given the short-term nature of the energy consumption. In regard to long-term operational related energy

consumption, the project result in fewer vehicle trips and would be less energy-intensive compared to a project that would be consistent with the land use and zoning designations analyzed in the OMCPU Final PEIR (see the discussion under Air Quality above). Consequently, development of the project would not result in any new or more severe impacts related to electrical power or fuel consumption in comparison to what was previously analyzed. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy and would not result in a need for new electrical systems or require substantial alteration of existing utilities.

Construction of the project would consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. However, all equipment would be required to meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. Section 5.9 of the OMCPU Final PEIR determined that there are no known conditions within the planning area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical fuel consumption rates. Due to the gently to moderately sloping topography and undeveloped nature of the project site, construction of the project would be consistent with this conclusion. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy (electricity or natural gas) during construction, and impacts would be less than significant.

Structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The square footage of the trailers would total 6,480 square feet. Due to the small size of the trailers, energy consumption would be minimal and would not exceed the assumptions used in the OMCPU Final PEIR.

Additionally, the project would be served by San Diego Gas & Electric, which currently has an energy mix that includes 39 percent renewable energy (California Public Utilities Commission 2020) and is on track to achieve 60 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Therefore, the project would not result in the use of excessive amounts of energy, create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR determined that impacts related to energy conservation would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Noise

OMCPU Final PEIR

Section 5.10 of the OMCPU Final PEIR provides an analysis of noise impacts associated with the OMCP.

Traffic Generated Noise
The OMCPU Final PEIR determined that impacts associated with traffic noise would be significant, as noise sensitive land uses are proposed in areas where exterior noise levels would exceed the noise and land use compatibility standards established in Table N-3 of the General Plan. Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate 805, SR-905, SR-125, Otay Mesa Road, and Airway Road. The OMCPU Final PEIR includes Mitigation Framework NOI-1 and NOI-2 that would be required by future projects to demonstrate the exterior and interior noise levels for residential uses would not exceed the compatibility standards of the City's General Plan. These measures required site-specific exterior and interior noise analyses to identify site-specific noise attenuating measures; however, even with implementation of these measures, because the effectiveness of project-level noise reduction measures cannot be known at the program level, the OMCPU Final PEIR determined that traffic noise resulting from implementation of the OMCP would not be compatible with the General Plan standards.

Stationary Source Noise
The OMCPU Final PEIR determined that impacts associated with stationary source noise would be significant, as the OMCP has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The OMCPU Final PEIR includes Mitigation Framework NOI-3, which requires preparation and submittal of a site-specific acoustical analysis to recommend site-specific noise attenuation measures. Noise reduction measures shall include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques. However, even with implementation of this measure, because the effectiveness of project-level noise reduction measures cannot be known at the program level, the OMCPU Final PEIR determined that impacts would remain significant and unavoidable at the program level.

Airport Noise
The OMCPU Final PEIR determined that impacts associated with airport noise would be less than significant, as existing uses within the 60 and 65 CNEL noise contours from Brown Field Municipal Airport would be considered conditionally compatible with these noise levels from operations as Brown Field Municipal Airport located 0.5-mile north of the project site and the General Abelardo L. Rodriguez International Airport located approximately 1.0 mile south of the project site in Tijuana, Mexico.

Construction Noise
The OMCPU Final PEIR determined that impacts associated with construction noise would be potentially significant, as construction activities related to implementation of the OMCP would

generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. In addition, construction-related noise associated with future development projects within the OMCP area could result in short-term, temporary noise impacts affecting coastal California gnatcatchers (*Polioptila californica*), raptors, and other sensitive species within the MHPA. In order to reduce potentially significant impacts associated with construction noise, the OMCPU Final PEIR includes Mitigation Framework NOI-4 (and LU-2) requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan; however, impacts were determined to remain significant and unavoidable.

Project

Consistent with OMCPU Final PEIR Mitigation Framework NOI-3, site-specific construction and operational noise levels were calculated the SoundPLAN model (RECON 2022c) to assess potential noise impacts.

The primary noise source in the vicinity of the project site is vehicular traffic on adjacent and nearby roadways from SR-905, Airway Road, Britannia Boulevard, and Cactus Road. The site is also exposed to aircraft noise levels less than 60 dB(A) CNEL from operations associated with Brown Field Municipal Airport and the General Abelardo L. Rodriguez International Airport (i.e., outside the 60 CNEL contour). Other existing ambient noise levels at the project site consist of activities and equipment at adjacent industrial properties. Based on the noise level measurements taken as a part of the OMCPU Final PEIR, ambient noise levels in Otay Mesa ranged from 61.5 to 80.9 dB(A) equivalent noise level [L_{eq}]. Ambient noise levels adjacent to Airway Road in the vicinity of the project were measured to be 72.6 dB(A) L_{eq}.

Traffic Generated Noise
OMCPU Final PEIR Mitigation Framework NOI-1 and NOI-2 do not apply to the project because they are related to noise exposure to residential uses and sensitive receptors, and the project does not include any sensitive receptors. Therefore, a site-specific acoustical analysis of on-site traffic was not required for the project. However, the project is required to comply with the land use compatibility standards in Table NE-3 of the General Plan. The off-site increase in vehicle traffic noise due to the project was also analyzed.

Vehicle Traffic Noise – Land Use Compatibility
In Table NE-3 of the General Plan, vehicle parking uses are “compatible” with exterior noise levels up to 75 CNEL. The project does not include any exterior sensitive use areas. Based on the vehicle traffic noise contours calculated in the OMCPU Final PEIR, the proposed trailers would be located outside the 75 CNEL contours for vehicle traffic on nearby roadways. These contours do not take into account shielding that would be provided by the proposed trailers. Therefore, the project would be compatible with the City’s 75 CNEL standard for vehicle parking uses, and impacts would be less than significant.

Vehicle Traffic Noise – Off-Site Noise Increase
The project would increase traffic volumes on local roadways. However, the project would not alter the speed on an existing roadway or create a new roadway. Thus, the primary factor affecting off-site noise levels would be increased traffic volumes. While changes in noise levels would occur along any roadway where project-related traffic occurs, for noise assessment purposes, noise level

increases are assumed to be greatest nearest the project site, as this location would represent the greatest concentration of project-related traffic. A substantial noise increase is defined as an increase of 3 dB above existing conditions as stated in the City's CEQA significance standards.

The opening day without project and opening day with project traffic volumes were provided by the traffic engineer (LLG 2022). Off-site traffic noise impacts have been evaluated based on the calculated change in noise levels due to the increase in traffic volumes from the no project opening day condition. Calculated noise levels take into account the percentage of trucks on the surrounding roadway network as well as the number of truck trips generated by the project. Table 6 presents a conservative assessment of traffic noise levels based on the opening day and opening day plus project noise levels, and associated noise increase.

Table 6
Off-site Noise Level Increases (CNEL)

Roadway	Segment	Opening Day without Project	Opening Day with Project	Noise Increase
Cactus Road	Airway Road to Driveway #1	61.5	63.2	1.7
Britannia Boulevard	Otay Mesa Road to SR-905 WB Ramps	73.2	73.5	0.3
	SR-905 WB Ramps to SR-905 EB Ramps	76.2	76.6	0.4
	SR-905 EB Ramps to Airway Road	77.5	78.0	0.5
	Airway Road to Driveway #7	75.6	75.7	0.1
Airway Road	Cactus Road to Continental Street	64.2	66.6	2.4
	Continental Street to Britannia Boulevard	68.6	70.8	2.2

SOURCE: RECON 2022c.
CNEL = community noise equivalent level; dB = decibel

As shown in Table 6, the project would not increase noise levels by 3 dB or more. Therefore, impacts associated with the increase in ambient vehicle traffic noise levels would be less than significant.

Stationary Source Noise
Mitigation Framework NOI-3 applies to noise-generating commercial and industrial uses sited near noise-sensitive uses (i.e., residential). Multi-family residential uses are currently being constructed immediately north of the eastern half of the project site (Silo at Epoca Apartments) and immediately west and southwest of the project site west of Airway Road (Otay Mesa Lumina). Additionally, existing single-family residential uses are located further to the northwest and southwest of the project site. Additionally, mixed-use commercial/residential development is planned for the undeveloped site immediately north of the western half of the project site. The project is required to comply with the operational noise level limits specified in the Noise Abatement and Control Ordinance.

In regard to stationary source noise, the main operational noise sources within the project would include trucks accessing the project site and idling, and mechanical ventilation equipment. Stationary sources of noise generated on a project site are regulated by the City's Noise Abatement and Control Ordinance. Section 59.5.0401 of the City's Noise Abatement and Control Ordinance states that:

A. It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit.

B. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

The applicable noise limits of the City's Noise Abatement and Control Ordinance are summarized in Table 7.

Table 7
Applicable Noise Level Limits

Land Use	Time of Day	One-Hour Average Sound Level [dB(A) L_{eq}]
Single-family Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 45 40
Multi-family Residential (up to a maximum density of 1 unit/2,000 square feet)	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 50 45
All other Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55 50
Commercial	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60 60
Industrial or Agricultural	Anytime	75

SOURCE: City of San Diego Noise Abatement and Control Ordinance Section 59.5.0401.
dB(A) L_{eq} = A-weighted decibels equivalent noise level

The project proposes truck/trailer parking facility that would be located adjacent to multi-family residential uses, single-family residential uses, and other industrial land uses. The applicable property line noise level limits between project site and the adjacent single-family residential uses are 62.5 dB(A) L_{eq} during the daytime hours, 60 dB(A) L_{eq} during the evening hours, and 57.5 dB(A) L_{eq} during the nighttime hours. The applicable property line noise level limits between project site and the adjacent multi-family residential uses are 65 dB(A) L_{eq} during the daytime hours, 62.5 dB(A) L_{eq} during the evening hours, and 60 dB(A) L_{eq} during the nighttime hours. The applicable property line noise level limit between project site and the adjacent industrial uses is 75 dB(A) L_{eq} at any time. The applicable noise level limit at the MHPA is 60 dB(A) L_{eq}. As discussed, mixed-use commercial/residential development is planned for the undeveloped site immediately north of the western half of the project site. Noise levels at this property were conservatively assessed using the multi-family noise level limits.

The on-site maneuvering associated with the trucks consists of the truck entering the site, driving to a parking space, and leaving the site. The project proposes access to the site via Airway Road, Cactus Road, and Britannia Boulevard. It was assumed that it would take 5 minutes for a truck to enter the site and position itself in a parking space. Truck engines can only idle for a maximum of 5 minutes in compliance with state regulations for air quality. Enforcement of these idling restrictions would limit idling. The unmitigated exterior noise levels for truck drive-by noise and truck engine noise were measured at 66.5 dB(A) L_{eq} at a distance of 25 feet. This is equivalent to a sound power level of 92.1 dB(A). According to the Access Analysis prepared for the project, a maximum of 166 vehicles

(156 trucks and 10 employee vehicles) would access the site during the peak hour (LLG 2022). These vehicles were modeled as an area source distributed over the footprint of the parking area.

The modular offices would be mechanically air conditioned by heating, ventilation, and air conditioning (HVAC) and condenser units. It is not known at this time which manufacturer, brand, or model of unit or units would be selected for use in the project. For the purposes of this analysis, to determine what general noise levels the HVAC units would generate, it was assumed that the HVAC units would be similar to a Carrier unit with a sound power level of 75 dB(A). HVAC units were modeled at full capacity.

Noise levels due to trucks and HVAC equipment were modeled using the SoundPLAN program. Noise levels were modeled at a series of 16 receivers located at the adjacent uses and MHPA. The results are summarized in Table 8. Modeled receiver locations and operational noise contours are shown in Figure 4.

Table 8
Operational Noise Levels at Off-site Receivers

Receiver	Land Use	Noise Level Limit Day/Evening/Nighttime [dB(A) L_{eq}]	Peak Hour Operational Noise Level [dB(A) L_{eq}]
1	Multi-Family Residential	65/62.5/60	51
2	Multi-Family Residential	65/62.5/60	52
3	Multi-Family Residential	65/62.5/60	52
4	Undeveloped/Future Commercial and Residential	65/62.5/60	52
5	Undeveloped/Future Commercial and Residential	65/62.5/60	51
6	Single-Family Residential	62.5/60/57.5	43
7	MHPA	60/60/60	40
8	MHPA	60/60/60	41
9	Undeveloped	--	51
10	Multi-Family Residential	65/62.5/60	49
11	Single-Family Residential	62.5/60/57.5	44
12	Industrial	75/75/75	51
13	Industrial	75/75/75	54
14	Industrial	75/75/75	45
15	Industrial	75/75/75	50
16	Industrial	75/75/75	46

SOURCE: RECON 2022c.
dB(A) L_{eq} = A-weighted decibels equivalent noise level
MHPA = multi-habitat planning area

As shown in Table 8, project operation would not generate on-site noise that would exceed the noise limits established in the City's Noise Abatement and Control Ordinance. Additionally, the project would not generate noise levels that exceed 60 dB(A) L_{eq} at the MHPA habitat. This analysis is conservative since it assumes peak hour vehicle and truck access and HVAC units operating at full capacity. Actual noise levels during the evening and nighttime hours and off-peak daytime hours would be less than those shown in Table 8. Therefore, on-site generated operational noise impacts would be less than significant.

Airport Noise
Review of Figure 5.1-4 of the OMCPU Final PEIR determined that the project site is located outside the 60 CNEL contours for the Brown Field Municipal Airport and the General Abelardo L. Rodriguez International Airport. No impact would occur.

Construction Noise
In order to reduce potentially significant impacts associated with construction noise, the OMCPU Final PEIR Mitigation Framework included measures NOI-4 (and LU-2) requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan for projects that exceed daily construction noise thresholds established by the City. The project is required to comply with the construction noise level limits specified in the Noise Abatement and Control Ordinance.

Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, paving, and delivery and placement of the modular trailer offices. Construction noise would potentially result in short-term impacts to surrounding properties. Construction noise is regulated by the City's Noise Abatement and Control Ordinance. Section 59.5.0404 of the City's Noise Abatement and Control Ordinance states that:

A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. . . .

B. . . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

Construction would be restricted to between the hours of 7:00 a.m. and 7:00 p.m., and construction noise levels may not exceed a 12-hour equivalent noise level [dB(A) $L_{eq(12)}$] of 75 dB(A) $L_{eq(12)}$ as assessed at or beyond the property line of a property zoned residential. The nearest sensitive receptors are multi-family residential uses that are currently being constructed immediately north of the eastern half of the project site (Silo at Epoca Apartments) and immediately west and southwest of the project site west of Airway Road (Otay Mesa Lumina). Additionally, existing single-family residential uses are located further to the northwest and southwest of the project site. Additionally, mixed-use commercial/residential development is planned for the undeveloped site immediately north of the western half of the project site. MHPA habitat is located approximately 775 feet to the northwest of the project site.

Table 9 summarizes typical construction equipment noise levels.

Table 9
Typical Construction Equipment Noise Levels

Equipment	Noise Level at 50 Feet [dB(A) L_{eq}]	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt ampts or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
Insitu Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%
SOURCE: FHWA 2006.		

During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Although maximum noise levels may be 85 to 90 dB(A) at a distance of 50 feet during most construction activities, hourly average noise levels from the grading phase of construction would be 84 dB(A) L_{eq} at 50 feet from the center of construction activity when assessing the simultaneous use of an excavator, loader, and dump truck.

Construction noise is considered a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. To reflect the nature of grading and construction activities, equipment

was modeled as an area source distributed over the project footprint. The total sound energy of the area source was modeled with three pieces of equipment operating simultaneously. Noise levels were modeled at a series of 15 receivers located at the adjacent uses and MHPA. The results are summarized in Table 10. Modeled receiver locations and construction noise contours are shown in Figure 5.

Table 10
Construction Noise Levels at Off-site Receivers

Receiver	Land Use	Construction Noise Level [dB(A) L_{eq}]
1	Multi-Family Residential	61
2	Multi-Family Residential	61
3	Multi-Family Residential	62
4	Undeveloped/Future Commercial and Residential	61
5	Undeveloped/Future Commercial and Residential	61
6	Single Family Residential	52
7	MHPA	48
8	MHPA	50
9	Undeveloped	60
10	Multi-Family Residential	58
11	Single Family Residential	52
12	Industrial	58
13	Industrial	61
14	Industrial	53
15	Industrial	59
16	Industrial	55

SOURCE: RECON 2022c.
dB(A) L_{eq} = A-weighted decibels equivalent noise level
MHPA = multi-habitat planning area

As shown in Table 10, construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent residential uses or 60 dB(A) L_{eq} at the adjacent MHPA habitat. Although the existing adjacent residences and MHPA would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary. As construction activities associated with the project would comply with noise level limits from Noise Abatement and Control Ordinance Section 59.5.0404, temporary increases in noise levels from construction activities would be less than significant.

Vibration
Construction operations have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. The effects of ground vibration may be imperceptible at the lowest levels, low rumbling sounds and detectable vibrations at moderate levels, and damage to nearby structures at the highest levels. Vibration perception would occur at structures, as people do not perceive vibrations without vibrating structures.

Project construction equipment used during site grading and excavation would have the greatest potential to generate vibrations that would affect nearby uses. Construction equipment would include equipment such as loaded trucks, excavators, dozers, and loaders. Vibration levels from

these pieces of equipment would generate vibration levels with a peak particle velocity (PPV) ranging from 0.035 to 0.089 inches per second (in/sec) PPV at 25 feet. Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. Based on several federal studies the threshold of perception is 0.035 in/sec PPV, with 0.24 in/sec PPV being a distinctly perceptible (Caltrans 2013). Neither cosmetic nor structural damage of buildings occurs at levels below 0.1 in/sec PPV. The nearest structure is located approximately 85 feet south of the project boundary. There are no structures within 25 feet of the project site; therefore, vibration levels would be below the distinctly perceptible threshold. Thus, groundborne vibration impacts from construction would be less than significant. Once operational, the project would not be a source of groundborne vibration.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to noise, and identified Mitigation Framework NOI-1 through NOI-4. Mitigation Framework NOI-1 and NOI-2 do not apply to the project because they are related to noise exposure to residential uses and sensitive receptors, and the project does not include any sensitive receptors. However, the project would be compatible with the City's 75 CNEL standard for vehicle parking uses and the project would not result in a significant increase in ambient noise levels due to an increase in traffic. Mitigation Framework NOI-3 applies to noise-generating commercial and industrial uses sited. Operational noise levels would not exceed the applicable Noise Abatement and Control Ordinance limits, and on-site generated operational noise impacts would be less than significant. The OMCPU Final PEIR Mitigation Framework included measures NOI-4 (and LU-2) requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan for projects that exceed daily construction noise thresholds established by the City. Construction noise levels are not anticipated to exceed 75 dB(A) L_{eq} at the adjacent residential uses or 60 dB(A) L_{eq} at the adjacent MHPA habitat, and temporary increases in noise levels from construction activities would be less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Paleontological Resources

OMCPU Final PEIR

Section 5.11 of the OMCPU Final PEIR determined that impacts on paleontological resources would be potentially significant. Buildout of the OMCP would occur within approximately 352 acres designated with high paleontological sensitivity, approximately 1,505 acres designated with moderate paleontological sensitivity, and less than one acre designated with low paleontological sensitivity. OMCPU Final PEIR Mitigation Framework PALEO-1 requires site-specific analysis and construction monitoring for projects that would exceed the City's Significance Determination Thresholds related to grading quantities and depth of excavation within areas designated as having moderate and high paleontological sensitivity ratings. Implementation of Mitigation Framework PALEO-1 would reduce impacts on paleontological resources to a level less than significant.

Project

Review of Figure 5.11-1 of the OMCPU Final PEIR determined that the project site is located within an area identified as being underlain by Very Old Paralic deposits (Qvop, formally known as the Lindavista Formation), which have been designated as having a moderate sensitivity level for paleontological resources. Additionally, the site-specific Geotechnical Investigation (GEOCON 2020) conducted borings that determined that the site is underlain by two types of Terrace Deposits (Qtc and Qtg), which have been designated as having a moderate sensitivity level for paleontological resources. The project would require 19,074 cubic yards of cut to a depth of 4.5 feet, and 84,291 cubic yards of import. Therefore, the project would not exceed the City's established significance threshold for a project requiring excavation within an area identified as having a moderate paleontological sensitivity rating, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to paleontological resources, and identified Mitigation Framework PALEO-1. However, Mitigation Framework PALEO-1 would not apply because the project would not exceed the City's established significance threshold for a project requiring excavation within an area identified as having a moderate paleontological sensitivity rating. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Transportation/Circulation

OMCPU Final PEIR

Section 5.12 of the OMCPU Final PEIR provides an analysis of transportation/circulation impacts associated with the OMCP.

Capacity and Level of Service
The OMCPU Final PEIR determined that impacts to the circulation system would be significant. Specifically, a total of 24 roadway segments under the Horizon Year Plus OMCPU condition would be expected to operate at unacceptable level of service, resulting in significant roadway segment impacts. A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus OMCPU condition, resulting in significant intersection impacts, and impacts at 39 intersections would remain significant after mitigation. The OMCPU Final PEIR determined that all Interstate 805 freeway segments studied would be expected to operate at an acceptable level of service in the Horizon Year Plus OMCPU condition, while five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus OMCPU condition, resulting in a significant impact at these five SR-905 freeway segments. In regard to freeway ramp metering impacts, the OMCPU Final PEIR determined that five SR-905 metered freeway on-ramps would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition, resulting in a significant impact.

The OMCPU Final PEIR Mitigation Framework stated that at the program level, impacts would be reduced through implementation of the OMCPU proposed classifications of roadways and identification of necessary roadway, intersection, and freeway improvements. Specific mitigation measures or construction of these improvements would be carried out at the project-level via the City's PFFP and/or specific improvement proposals included as part of future development projects. Funding would be through construction by individual development projects, collection of Facilities Benefit Assessment fees, fair-share contributions to be determined at the project-level, and potentially other sources.

The OMCPU Final PEIR identified significant impacts on roadway segments throughout the OMCP area. Even with implementation of the recommended street classifications identified in Table 5.12-4 of the OMCPU Final PEIR, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition, resulting in significant and unmitigated impacts to roadway segments. The OMCPU Final PEIR Mitigation Framework stated that partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future discretionary subsequent development projects are proposed, project-specific traffic analyses would be required to contain detailed recommendations.

The OMCPU Final PEIR identified significant impacts at 49 intersections throughout the OMCP area. OMCPU Final PEIR Mitigation Framework TRF-1 requires intersection improvements per the lane designations identified in the OMCPU Final PEIR Figures 5.12-4a through 5.12-4g. However, the OMCPU Final PEIR concludes that even with the lane configurations proposed for the intersections analyzed, impacts at 39 intersections would continue to be significant and unmitigated.

The OMCPU Final PEIR proposed mitigations for freeway segment impacts include the construction of high-occupancy vehicle lane in each direction on the SR-905. However, because the affected freeway segments are owned and operated by Caltrans, mitigation to these segments cannot be guaranteed by the City in a timely manner. Therefore, additional mitigation such as Transportation Demand Management measures may be identified in the future at the project-level; however, impacts to the SR-905 mainline segments would remain significant and unmitigated.

At the time future development projects are proposed, project-specific traffic analyses would be required to contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact; however, at the program level, impacts would remain significant and unmitigated.

Traffic Hazards

The OMCPU Final PEIR determined that all roadway improvements would be designed and constructed in accordance with the OMCP Mobility Element roadway network satisfactory to the City Engineer. Additionally, the OMCP includes policies that would reduce potential conflicts between vehicle, pedestrian, and bicyclists. Conformance to City design standards and OMCP policies would reduce impacts associated with traffic hazards to motor vehicles, bicyclists, or pedestrians to a level less than significant.

Circulation and Access
The OMCPU Final PEIR determined that buildout of the OMCP would result in increased circulation capacity and access for vehicles, bicycles, and pedestrians. Temporary closures with detours that may be required during street improvements would be addressed through traffic control plans in accordance with City policy as construction plans for future projects are processed through the City. The OMCPU Final PEIR determined that impacts related to circulation and access would be less than significant.

Alternative Transportation
The OMCPU Final PEIR determined that the OMCP included plans to improve the pedestrian, transit, and bicycle transportation network and that impacts would be less than significant.

Project

Consistent with the OMCPU Final PEIR Mitigation Framework, a site-specific Access Analysis was completed by LLG (LLG January 2023). The following is a brief summary of the analysis and conclusions of the technical study.

Capacity and Level of Service
Methodology
Potential traffic impacts were analyzed using the *Highway Capacity Manual 6th Edition (HCM 6)*, with the assistance of the *Synchro 11* computer software and compared to the City Level of Service (LOS) criteria for intersections and roadway segments.

Project Trip Generation
The project would develop a fenced truck/trailer parking facility providing a total of 871 truck/trailer parking spaces that would be available for up to nine tenants/users. Each tenant/user will have a modular trailer office of 720 square feet with three vehicle parking spaces. Based on these proposed land use types, the Access Analysis estimated project trip generation based on rates for "truck parking facility" and "single-tenant office" found in the City's *Trip Generation Manual*. As shown in Table 11, the project is expected to generate approximately 1,040 ADT, with 157 trips (112 inbound/45 outbound) during the AM peak hour and 166 trips (63 inbound/103 outbound) during the PM peak hour.

Table 11
Project Trip Generation

		Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
					In:	Volume				In:	Volume		
Land Use	Size	Rate[a]	Volume	% of ADT	Out Split	In	Out	Total	% of ADT	Out Split	In	Out	Total
Truck Parking Facility[a]	32.47 acres	30/acre	975	15%	70:30	103	44	147	16%	40:60	6	94	156
Single-Tenant Office[b]	6.480 KSF	10/KSF	65	15%	90:10	9	1	10	15%	10:90	1	9	10
Total		—	1,040	—	—	112	45	157	—	—	63	103	166

KSF = 1,000 square feet
[a]Rate is based on City of San Diego's Trip Generation Manual for "Truck Parking Facility". Since peak hour splits are not provided for this land use, the "warehousing" splits were used.

[b]The project proposes to construct a 720-sf modular trailer offer for each of the nine (9) tenants/users, for a total of 6,480 sf of single-tenant office space.

Impact Analysis

The Access Analysis developed a study area based on the anticipated distribution of project traffic that included the following intersections and street segments:

Intersections:

1. Otay Mesa Road/Britannia Boulevard
2. Britannia Boulevard/SR-905 WB Ramps
3. Britannia Boulevard/SR-905 EB Ramps
4. Britannia Boulevard/Airway Road
5. Airway Road/Continental Street/Project Driveway #4
6. Airway Road/Cactus Road
7. Cactus Road/Project Driveway #1 (Does not exist)
8. Airway Road/Project Driveway #2 (Does not exist)
9. Airway Road/Project Driveway #3 (Does not exist)
10. Airway Road/Project Driveway #5 (Does not exist)
11. Airway Road/Project Driveway #6 (Does not exist)
12. Britannia Boulevard/Project Driveway #7 (Does not exist)

Roadway Segments:

1. Cactus Road
   - Airway Road to Project Driveway #1
2. Britannia Boulevard
   - Otay Mesa Road to SR-905 WB Ramps
   - SR-905 WB Ramps to SR-905 EB Ramps
   - SR-905 EB Ramps to Airway Road
   - Airway Road to Project Driveway #7
3. Airway Road
   - Cactus Road to Continental Street
   - Continental Street to Britannia Boulevard

Existing weekday daily street segment counts and AM and PM peak hour (7:00-9:00 AM and 4:00-6:00 PM) intersection counts (including bicycle and pedestrian counts) were conducted on Thursday, April 21, 2022.

<u>Existing Plus Project</u>

All intersections in the Existing Plus Project scenario are expected to operate at an acceptable LOS D or better.

All roadway segments in the Existing Plus Project scenario are expected to operate at an acceptable LOS D or better with the exception of the roadway segment of Britannia Boulevard from Airway Road to Project Driveway #7 (LOS E). However, this roadway segment operates at LOS E in the existing condition. Per the City of San Diego's significance criteria, no impact is identified on this segment because the project's traffic contribution would not exceed the allowable threshold.

Opening Year 2023 Plus Project

This scenario evaluated potential impacts based on the addition of project traffic in the Opening Year 2023 conditions.

All intersections in the Opening Year 2023 Plus Project scenario are expected to operate at an acceptable LOS D or better.

All roadway segments in the Opening Year 2023 Plus Project scenario are expected to operate at LOS B or better with the exception of the following:

- Britannia Boulevard, from SR-905 EB Ramps to Airway Road (LOS E)
- Britannia Boulevard from Airway Road to Project Driveway #7.

However, both of these roadway segments operate at LOS E in the existing condition. Per the City of San Diego's significance criteria, no impact is identified because the project's traffic contribution would not exceed the allowable threshold.

Based on the impact analysis described above, the project would not result in any significant intersection or roadway impacts, and no mitigation would be required. However, the project would make the following frontage improvements as design features:

- The project will dedicate 71 to 65 feet and widen Airway Road and construct a full-width raised median along the project frontage and provide half-width improvements to include a 54-foot to 64-foot centerline-to-curb width and a 27-foot parkway and removal of power poles from the traveled way.. The 27-foot parkway width would include an 8.5-foot landscape buffer as part of a green street biofiltration basin, 2-foot bike path buffer, 8-foot Class I bike path, 2-foot bike path buffer and a 6-foot non-contiguous sidewalk, consistent with the Central Village Specific Plan approved by City Council on April 4, 2017, with the exception of an 8-foot Class I bike path (vs. 10-foot Class I bike path in the Central Village Specific Plan), which is required in order to provide a cross section consistent with City of San Diego Green Street standards.

- The project will dedicate 45 feet and widen Britannia Boulevard along the project frontage to provide half-width improvements to include a 55-foot centerline-to-curb width and a 20-foot parkway. The 20-foot parkway width would include a 14-foot landscape buffer, which includes a green street biofiltration basin, and a 6-foot non-contiguous sidewalk.

- The project will dedicate 40 to 56 feet and widen Cactus Road and construct a full-width raised median along the project frontage and provide half-width improvements to include 38-foot to 54-foot centerline-to-curb width and a 22-foot parkway and removal of power poles from the traveled way. The 22-foot parkway width include a 16-foot landscape buffer, which includes a green street biofiltration basin, and a 6-foot non-contiguous sidewalk.

Frontage improvements on Britannia Boulevard would improve roadway segment operations from Airway Road to Project Driveway from LOS E to LOS C under the Opening Year 2023 Plus Project scenario. Similarly, frontage improvements on Airway Road would improve roadway segment operations from Continental Street to Britannia Boulevard from LOS B to LOS A under the Opening Year 2023 Plus Project scenario.

The Access Analysis evaluated vehicular queuing using SimTraffic 11 for the westbound left-turning lanes at the proposed project driveways (i.e., Driveways #2, #4, and #5) where left-turn pockets are proposed. The evaluation utilized 95th percentile queues based on 60-minute recording time, 15- minute seed, and an average of 10 simulations. The queueing analysis determined that the westbound left-turning queues at Driveways #2, #4, and #5 are expected be contained within the proposed left-turn pocket storage length.

Therefore, no issues related to queuing were identified.

Traffic Hazards
The project is requesting a PDP for a deviation from the Land Development Code requirement (Section 142.0560(j) Table 142-05M) from maximum allowed 30-foot wide driveways to 40-foot wide driveways to accommodate semi-truck turn radius movements. These driveways would be designed and constructed consistent with the requirements of the City's design standards. Similarly, all roadway improvements would be designed and constructed consistent with the requirements of the City's design standards. Therefore, the project would not result in traffic hazards, and impacts would be less than significant.

Circulation and Access
The project would make roadway improvements that would increase circulation capacity and access for vehicles, bicycles, and pedestrians. The project would utilize a traffic control plan in accordance with City policy during construction to maintain access on Britannia Boulevard, Airway Road, and Cactus Road. Therefore, impacts related to circulation and access would be less than significant.

Alternative Transportation
Contiguous sidewalk currently exists along the north side of Airway Road between Cactus Street and Britannia Boulevard. Along the project frontages, there are no sidewalks on the south side of Airway Road, on Britannia Boulevard or on Cactus Road. As part of the project frontage improvements, the project will provide half-width improvements that would include a 6-foot non-contiguous sidewalk along the full project frontages of Airway Road, Britannia Boulevard, and Cactus Road. Therefore, the project would improve pedestrian access.

No bicycle facilities are currently provided along Airway Road and Cactus Road. Class II bike lanes are provided on both sides of Britannia Boulevard between Otay Mesa Road and Airway Road. However, bike lanes are not provided on Britannia Boulevard along the project frontage. As part of the project frontage improvements, the project will install a Class II buffered bike lane and Class I bike path on Airway Road. In addition, the project will provide Class II buffered bike lanes on Cactus Road and Britannia Boulevard. Therefore, the project would improve bicycle access.

The following two existing bus stops are located within 0.25-mile walking distance from the project site:

- Eastbound and westbound bus stops for San Diego Metropolitan Transit System (MTS) Route 909 are located on Airway Road on the east side of Britannia Boulevard (approximately 500 feet east of Britannia Boulevard). Route 909 provides service between Southwestern Higher Education Center Otay Mesa and the Otay Mesa Transit Center. Weekday service begins at 5:05 a.m. with 1-hour headways and ends at 7:46 p.m.

The project would not physically impact either of these bus stops and would improve access through construction of the frontage improvements. Therefore, the project would improve access to transit.

Complete Communities: Housing Solutions and Mobility Choices Program

In November 2020, the City of San Diego adopted the Complete Communities: Housing Solutions and Mobility Choices Program. Complete Communities includes planning strategies that work together to create incentives to build homes near transit, provide more mobility choices and enhance opportunities for places to walk, bike, relax, and play. These efforts ensure that all residents have access to the resources and opportunities necessary to improve the quality of their lives.

The purpose of the Mobility Choices Regulations is to reduce citywide vehicle miles traveled (VMT) to address the environmental impacts of development related to noise, air pollution, and greenhouse gas emissions, and to promote public health and enjoyment, by investing in active transportation infrastructure and amenities that will result in the greatest reductions to citywide VMT.

The San Diego Municipal Code (SDMC) Ordinance Number O-21274, adopted on December 9, 2020, provides the development regulations for the Mobility Choices portion of the Complete Communities program. According to the ordinance, the Project is located in Mobility Zone 2. Mobility Zone 2 means any premises located either partially or entirely within a Transit Priority Area (TPA).

SDMC Section 143.1103(b) indicates the requirement for the application of VMT Reduction Measures for all development located within Mobility Zone 2 in accordance with the Land Development Manual Appendix T. The City of San Diego's Land Development Manual Appendix T provides a list of VMT Reduction Measures that are split into a series of categories, which include Pedestrian Measures, Bicycle Supportive Measures, Transit Supportive Measures, and Other Measures. Each of the individual measures is given an assigned point value per unit of measure. For development in Mobility Zone 2, SDMC Section 143.1103(b)(1) identifies the requirement to provide VMT Reduction Measures totaling at least 5 points. The project would provide the following measures as required by the ordinance that add up to at least 5 points as identified in the City of San Diego's Land Development Manual Appendix T:

- The project would install new bicycle infrastructure on Airway Road along the project frontage, which would include a Class II buffered bike lane and a Class I bike path (3 points).
- The project would provide three long-term bicycle parking spaces, which is more than 10 percent beyond the minimum requirement (2.5 points).

Therefore, the project would comply with the requirements of the Complete Communities: Housing Solutions and Mobility Choices Program.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to transportation, and identified a Mitigation Framework with numerous measures to address potential impacts. The OMCPU Final PEIR Mitigation Framework stated that at the program level, impacts would be reduced through implementation of the OMCPU proposed classifications of roadways and identification of necessary roadway, intersection, and freeway improvements. Specific mitigation measures or construction of these improvements would be carried out at the project-level via the City's PFFP and/or specific improvement proposals included as part of future development projects. The project would make improvements on Britannia Boulevard, Airway Road, and Cactus Road consistent with this finding in the OMCPU Final PEIR Mitigation Framework. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Public Services

OMCPU Final PEIR

Section 5.13 of the OMCPU Final PEIR provides an analysis of public service impacts associated with the OMCP. The OMCP would increase demand for fire protection services and would contribute to the need for new or altered facilities. The OMCP anticipated construction of a planned 10,500-square-foot fire station (Fire Station No. 49) in addition to a 10,500-square-foot fire station to be collocated with the police facilities near Britannia Boulevard and Airway Road to ensure the department meets established response times, within the OMCP area. The construction of new facilities would take place within the development footprint of the OMCP and would be subject to separate environmental review at the time design plans are available. Therefore, at the program-level of analysis conducted for the OMCPU Final PEIR, impacts related to the construction of fire protection facilities were determined to be less than significant.

The OMCPU Final PEIR stated that buildout of the OMCP would result in additional demand for police service in Beat 713. At stated in the OMCPU Final PEIR, the average response times for Beat 713 exceed both the citywide average and police department goals for Emergency, Priority One, and Priority Two calls. Police response times would continue to increase with the buildout of OMCPU and the increase of traffic generated by new growth, requiring construction of new facilities. A 10,000-square-foot collocated police/fire-rescue facility is contemplated by the PFFP for the OMCP. The construction of this facility would be within the development footprint of the OMCP and would be subject to separate environmental review at the time design plans are available. Therefore, it was determined that, at the program level analysis, impacts related to the construction of new police protection facilities would be less than significant.

The OMCP Final PEIR stated that buildout of the OMCPU would place additional demands on school services and additional school facilities would be required to meet the needs of the OMCP buildout. As discussed in the OMCPU Final PEIR, the construction of these facilities would take place within the

development footprint of the plan area and be subject to separate environmental review at the time design plans are available. The OMCPU Final PEIR determined that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with the OMCPU would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. Therefore, impacts associated with future school facilities were determined to be less than significant.

The OMCPU Final PEIR identified that new parks would be required in the OMCP area in order to meet the increased demand associated with buildout of the OMCPU. Under the OMCPU, approximately 2,909 acres would be designated for parks and open space. Of this, 161 acres were designated for population-based parks. The remaining 2,748 acres would consist of open space. The construction of additional park facilities is specifically indicated in the PFFP for the OMCP; and the OMCPU Final PEIR stated that it is reasonable to assume that these facilities would be constructed in the future. The construction of these facilities would take place within the development footprint of the OMCP and would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, the OMCPU Final PEIR determined that impacts related to the construction of new park and recreation facilities within the OMCP area would be less than significant.

The OMCPU Final PEIR stated that there would be a need for an additional library facility to serve the OMCP area upon buildout. The OMCPU Final PEIR stated that the construction of a new facility was specifically contemplated by the current PFFP for the OMCP, and that it is reasonable to assume that this facility would be constructed in the future. The construction of this facility would take place within the development footprint of the OMCP and would be subject to separate environmental review at the time design plans are available. Therefore, the OMCPU Final PEIR determined that at the program level of analysis, impacts related to the construction of a new library within the OMCP area would be less than significant.

Project

Structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The square footage of the trailers would total 6,480 square feet. Due to the small size of the trailers, the project would not result in development beyond that anticipated under the OMCP and would not increase the demand for fire protection within the service area. Furthermore, the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future fire protection facilities. Therefore, the project would not require any new or expanded fire protection facilities, and impacts would be less than significant.

The project would not result in development beyond that anticipated under the OMCP and would not increase the demand for police protection within the service area. Moreover, ongoing funding for police services is provided by the City General Fund, and the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future police protection facilities. Therefore, the project would not require any new or expanded police protection facilities, and impacts would be less than significant.

The project is limited to development of a truck/trailer parking facility and would not construct any housing that could result in an increase in population beyond what was anticipated by the OMCP. Therefore, the project would be consistent with growth projections that were utilized to forecast demand for future school services, park and recreation facilities, libraries, and other public services that were analyzed in the OMCPU Final PEIR. Therefore, the project would not result in population growth that could increase demand for school services, park and recreation facilities, libraries, or other public services and would not require construction of additional infrastructure beyond what was anticipated in the OMCP. No impact would occur.

Conclusion

The OMCPU Final PEIR determined that impacts related to public services would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Public Utilities

OMCPU Final PEIR

Section 5.14 of the OMCPU Final PEIR evaluated potential impacts on utility services that may occur through development of the OMCP.

Water, Sewer, and Reclaimed Water

The OMCPU Final PEIR concluded that impacts associated with water and reclaimed water utility systems would be less than significant, as improvements to these systems had been previously identified in master planning documents, including Otay Water District's (OWD) 2008 Water Resources Master Plan and 2010 Water Resources Master Plan Update and the City's Public Utilities Department (PUD) Otay Mesa Master Plan Optimization Baseline Report, and would be required regardless of whether the OMCP was implemented. The OMCPU Final PEIR determined that impacts associated with wastewater would be less than significant, as the 2004 Otay Mesa Trunk Sewer Master Plan and 2009 Refinement Report previously identified sewer system improvements as required in future phases to accommodate buildout wastewater generation from the area. The three additional improvements identified within the OMCP would occur within existing utility line easements and facilities and would not result in significant impacts to the environment.

Storm Water Infrastructure

Impacts associated with storm water infrastructure were concluded to be less than significant, as no storm drains, or other community-wide drainage facilities are proposed for construction in conjunction with adoption of the OMCP. All such facilities would be constructed in conjunction with future development projects implemented in accordance with the OMCP, designed to the satisfaction of the City Engineer. At the project-level, adherence to existing storm water regulations, conformance with General Plan and OMCPU policies, and review under CEQA would assure that impacts associated with the requirements for and/or construction of storm water infrastructure would be less than significant at the program-level.

Solid Waste
The OMCPU Final PEIR determined that discretionary projects that would generate 60 tons or more of waste would be required to prepare a Waste Management Plan (WMP) that is subject to City approval. However, compliance with the Storage, Recycling, and Construction and Demolition ordinances alone would result in only a 40 percent diversion rate within in the OMCPU area. Because all future projects within the OMCPU area may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, impacts related to solid waste to meet the 75 percent diversion requirement could not be assured at the program-level. Therefore, OMCPU Final PEIR determined that impacts associated with solid waste would be significant and unavoidable at the program-level.

Communication Systems
Communication systems impacts were identified as less than significant, as cable and telephone services would be available through private utility companies that have capacity to serve the OMCP area. In addition, the OMCPU Final PEIR determined that short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the OMCP would not result in significant impacts because communication lines would be within existing or planned roadway ROW.

Project

Water, Sewer, and Reclaimed Water
The project would develop a truck/trailer parking facility, and structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The square footage of the trailers would total 6,480 square feet. Due to the small size of the trailers, the project would not exceed growth projections that were utilized to forecast demand for sewer and water service that was analyzed in the OMCPU Final PEIR. Site-specific connections to existing water and wastewater infrastructure would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, the project would not increase demand for sewer and water service within the service area that would necessitate construction of new off-site facilities, and impacts would be less than significant.

The project would develop a truck/trailer parking facility, and structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The square footage of the trailers would total 6,480 square feet. Due to the small size of the trailers, the project would not exceed growth projections that were utilized to forecast demand for future reclaimed water that was analyzed in the OMCPU Final PEIR. Site-specific connections to existing recycled water infrastructure would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, the project would not result in development beyond that anticipated under the OMCPU and would not increase the demand for reclaimed water within the service area.

Storm Water Infrastructure
As described in the hydrology and water quality section above, there are currently no storm drain facilities on the property. Existing on-site drainage consists of natural sheet flows towards two drainage areas. One sheet flows southeast into an existing channel located along Britannia Boulevard. The second drainage area is located at the northwest corner of the project site and sheet-flows in a northwestern direction towards the southeast corner of the intersection of Airway

Road and Cactus Road. Additionally, a small portion of Cactus Road drains south. The SWQMP determined that development of the project would convert 8.13 acres (22.0 percent) of the project site to impervious surfaces (K&S Engineering 2022a). In order to address this increase of impervious surfaces, the project would install three biofiltration basin for the purpose of water quality, hydromodification, and peak flow detention. Two biofiltration basins would be located along the western half of the southern project boundary, and the third biofiltration basin would be located in the northwestern corner of the project site. The project would install a modular wetlands system with curb opening in the southwest corner of the project site, as well as green street swales located along Britannia Boulevard, Airway Road, and Cactus Road. These stormwater facilities would be located within the project footprint evaluated throughout this EIR Addendum. The project would also introduce an underground system of storm drainpipes and inlets to convey runoff to the existing POCs located in the northwest and southeast corners of the project site that would be retained. To address off-site drainage deficiencies southeast of the project site, the project would replace the existing 30-inch RCP within the ROW of Britannia Boulevard with a double 30-inch RCP that would be installed at a steeper slope gradient compared to the existing condition. The project would also be subject to conditions detailing the requirements for the detention analysis to demonstrate no increase to peak flows and upgrades to the deficient receiving conveyance system downstream of the project that will require collaboration with the Stormwater Department.

The Preliminary Drainage Report utilized the rational method hydrology program CIVILCADD/ CIVILDESIGN which is based on the City of San Diego Drainage Design Manual, to document that project would reduce flow rates under the 5-, 10-, 25-, and 50-year storm events as follows:

POC 1 (Southeast Corner of Project Site)

- Reduce the 5-Year flow rate from 23.55 cubic feet per second (cfs) in the existing condition to 22.44 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 25.25 cfs in the existing condition to 23.76 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 28.03 cfs in the existing condition to 26.50 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 32.10 cfs in the existing condition to 30.22 cfs in the post-project condition (K&S Engineering 2022b).

POC 2 (Northwest Corner of Project Site)

- Reduce the 5-Year flow rate from 4.18 cfs in the existing condition to 2.16 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 4.92 cfs in the existing condition to 2.54 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 5.55 cfs in the existing condition to 2.86 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 6.45 cfs in the existing condition to 3.33 cfs in the post-project condition (K&S Engineering 2022b).

Cactus Road

- Reduce the 5-Year flow rate from 0.54 cfs in the existing condition to 0.24 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 0.61 cfs in the existing condition to 0.28 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 0.65 cfs in the existing condition to 0.31 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 0.72 cfs in the existing condition to 0.36 cfs in the post-project condition (K&S Engineering 2022b).

Therefore, the project would not require the construction of off-site stormwater infrastructure facilities.

According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). Five infiltration tests were conducted which determined that infiltration rates ranged from 0.027 to 0.0027 per hour. Based on the results of the field infiltration tests, full or partial infiltration should be considered infeasible (GEOCON 2021). Therefore, the project proposes to utilize three biofiltration basins, a modular wetlands system with curb opening in the southwest corner of the project site, as well as green street swales located along Britannia Boulevard, Airway Road, and Cactus Road. The SWQMP identified 12 Drainage Management Areas (DMAs). DMAs 1, 2 and 3 would consist of approximately 80 percent of the project site comprising the truck parking area and the majority of the office trailers. DMA 1 would drain to biofiltration basin BMP 1 proposed along the southern project boundary. DMA 2 would drain to biofiltration basin BMP 2 proposed along the southern project boundary immediately west of biofiltration basin BMP 1. DMA 3 would drain to biofiltration basin BMP 3 proposed in the northwest corner of the project site. DMAs 4, 5, and 6 would be landscaped self-mitigating areas draining onto Britannia Boulevard and Airway Road. Therefore, no BMP would be required for DMAs 4, 5, and 6. DMA 7 would be conveyed to the modular wetland system in the southwest corner of the project site. DMAs 8 through 12 would consist of the public street improvements, which would drain to the green street swales located along Britannia Boulevard, Airway Road, and Cactus Road. As described above, the project would reduce peak flows under the 5-, 10-, 25-, and 50-year storm event compared to the existing condition, and the project would prevent off-site erosion or sedimentation by retaining the existing on-site drainage pattern. Additionally, the site-specific SWQMP prepared by K&S Engineering (2022a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual.

As described in the Biological Resources section above, there are no jurisdiction drainages or wetlands on-site. Therefore, the project would not require permits from the RWQCB or ACOE under federal CWA Section 401 or 404. Therefore, construction of stormwater infrastructure would not result in any environmental impacts that have not been evaluated throughout this EIR Addendum, and impacts would be less than significant.

Solid Waste
Consistent with OMCPU Final PEIR Mitigation Framework UTIL-1, a site-specific WMP was prepared for the project by RECON (RECON 2021). The project site is currently undeveloped and would not require demolition requiring disposal. The project would require a net import of approximately 84,291 cubic yards of soil, and all green waste would be recycled for 100 percent diversion during grading. Structures on-site would be limited to nine modular trailer office of approximately 720 square feet each, for a total of up to 6,480 square feet of modular trailer office. The nine modular trailer offices would be pre-fabricated structures brought to the site fully constructed once paving activities are completed. Construction waste is anticipated to be minimal as no demolition is proposed and minimal construction is proposed associated with frontage improvements and fence installations. Therefore, the project would not conflict with the City's current 75 percent waste diversion goal. The project would provide nine 48-square-foot refuse storage and recycling areas that would collectively provide 432 square feet of refuse/recycling material storage. Implementation of the Waste Reduction Measures documented in the WMP would reduce operational impacts related to solid waste to a level less than significant.

Communications Systems
The project would develop a truck/trailer parking facility, and structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The square footage of the trailers would total 6,480 square feet. Due to the small size of the trailers, the project would not exceed growth projections that were utilized to forecast demand for future communications systems that was analyzed in the OMCPU Final PEIR. Site-specific connections to existing communications infrastructure would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, communications services connections would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to Public Utilities, and identified Mitigation Framework UTIL-1. Consistent with OMCPU Final PEIR Mitigation Framework UTIL-1, a site-specific WMP was prepared for the project. The site-specific WMP determined that implementation of the Waste Reduction Measures documented in the WMP would reduce operational impacts related to solid waste to a level less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Water Supply

OMCPU Final PEIR

Section 5.15 of the OMCPU Final PEIR determined that impacts on water supply associated with buildout of the OMCP would be less than significant.

Water Supply
The City PUD prepared a Water Supply Assessment (WSA) for the OMCPU Final PEIR that determined sufficient water supply would be available to serve existing demands, project demands of the OMCP, and future water demands within the City PUD and OWD service area in normal and dry year forecasts during a 20-year projection.

Landscape Plans
Buildout under the OMCP would result in the placement of new landscaping requiring water use for irrigation purposes. However, future development would be required to adhere to Landscape Standards found in the City's Land Development Manual, as well as General Plan and OMCP policies regarding the use of drought-tolerant plantings for project landscape plans. The OMCPU Final PEIR concluded that adherence to these requirements would prevent excessive water usage for irrigation and other purposes, and impacts would be less than significant.

Project

Water Supply
The project did not meet the City's CEQA threshold of industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space that would require preparation of a WSA. The WSA completed for the OMCPU Final PEIR considered development of the project site based on the existing land use and zoning designations. The WSA completed for the OMCPU Final PEIR determined that future water supply within the City PUD and the OWD's service area would be sufficient to meet the projected water demands under buildout of the OMCP, as well as existing and other reasonably foreseeable planned development projects within the OWD for a 20-year planning horizon, in normal and in single and multiple dry years. As discussed in the OMCPU Final PEIR, the projected water demand of the OMCP with the City's PUD service area was estimated at 5,563 acre-feet per year (AFY). Per the City's 2010 Urban Water Management Plan, the planned water demand for the adopted OMCP was 5,393 AFY. The remaining portion of the estimated 170 AFY was accounted for through the Accelerated Forecast Growth demand increment of the San Diego County Water Authority 2010 Urban Water Management Plan. Structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site that would not increase demand for water supply beyond what was considered for the project site in the OMCPU Final PEIR. Therefore, the project would not result in development beyond that anticipated under the OMCP or increase demand for water supply, and impacts would be less than significant.

Landscape Plans
The project would conform with existing landscape plan regulations, as well as the General Plan and OMCP policies pertaining to landscaping, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. Impacts would be less than significant. No mitigation measures would be required.

Conclusion

The OMCPU Final PEIR determined that impacts related to water supply and landscape plans would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final

PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Population and Housing

OMCPU Final PEIR

Section 5.16 of the OMCPU Final PEIR provides an analysis of population and housing impacts associated with the OMCP.

Population Growth
The OMCPU Final PEIR determined that impacts associated with population growth would be less than significant, as the OMCP would implement SANDAG's Regional Comprehensive Plan and Regional Housing Element and the City's General Plan and Housing Element by providing a mix of housing types within mixed-use centers linked to public transportation, increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast, and focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the Regional Comprehensive Plan and General Plan goals and policies. The OMCP provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist, resulting in a less than significant impact.

Affordable Housing
The OMCPU Final PEIR determined that impacts associated with affordable housing would be less than significant, as the land use designations and design guidelines contained in the OMCP are intended to foster the development of housing for all income levels. As such, the OMCP would provide affordable housing units consistent with federal and state regulations and the City's objective of increasing the stock of affordable housing impacts to affordable housing, resulting in a less than significant impact.

Project

Population Growth
The project is limited to development of a truck/trailer parking facility and would not construct any housing that could result in an increase population beyond that anticipated in the OMCP. Structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site that would not require construction of additional infrastructure beyond what was anticipated in the OMCP that could induce growth. Therefore, the project would not result in substantial population growth or growth inducement. No impact would occur.

Affordable Housing
The project site is currently vacant and does not possess any structures. The project is limited to development of a truck/trailer parking facility and would not construct any housing. Structures on-site would be limited to nine pre-constructed state-approved office trailers that would be brought onto the site. The project would not result in any land use modifications that would affect the City's Inclusionary Affordable Housing Ordinance.

Conclusion

The OMCPU Final PEIR determined that impacts related to population and housing would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Agricultural and Mineral Resources

OMCPU Final PEIR

Section 5.17 of the OMCPU Final PEIR provides an analysis of agricultural and mineral resource impacts associated with the OMCP.

Conversion of Agricultural Land
The OMCPU Final PEIR determined that impacts associated with the conversion of agricultural land would be less than significant. It was determined that although the OMCP would convert additional Important Farmland to non-agricultural uses, these areas are fragmented and are surrounded by urban land uses and MHPA lands, and agricultural viability within the OMCP area has been significantly reduced due to rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts. Agricultural land in the OMCP area is intended as an interim, rather than permanent use. The OMCP allows agriculture as an interim use pending development and would rezone the Central Village to an agricultural "holding" zone to accommodate continued agricultural operations until such time that a Specific Plan is implemented.

The OMCPU Final PEIR determined that impacts associated with City and regional consequences of agricultural land conversion would be less than significant, as the viability of this area for agricultural use is limited, and the amount of existing farmland is minimal relative to the regional total.

Mineral Resources
The OMCPU Final PEIR determined that impacts to mineral resources would be less than significant, as portions of the OMCP area where Mineral Resource Zone MRZ-2 (MRZ-2) "regionally significant" aggregate resource areas exist are currently developed or where entitlements have already been approved for future development. These existing and planned developments restrict access to these aggregate areas and preclude the ability to extract those resources. Further, the majority of the acreage designated as MRZ-2 contains existing residential uses, which would be incompatible with extraction operations even under the adopted community plan. Impacts to MRZ-3 areas were determined not to be significant. As such, the ability to extract mineral resources would not be impacted with the adoption of the OMCPU.

Project

Conversion of Agricultural Land
Review of Figure 5.17-1 of the OMCPU Final PEIR determined that the project site has been designated by the California Department of Conservation Farmland Mapping and Monitoring Program as Farmland of Local Importance. The project site is not in active agricultural use and is

surrounded by developed uses or land that is planned for development. Furthermore, the viability of the plan area for agricultural use is limited and minima, and the project site is not designated for agricultural production in the OMCP or zoned for agricultural production in the City's Official Zoning Map. Therefore, impacts associated with the conversion of agricultural land to non-agricultural uses would be less than significant.

Mineral Resources
Review of Figure 5.17-3 of the OMCPU Final PEIR determined that the project site is designated as MRZ-3. Land designated as MRZ-3 is not considered a significant mineral resource pursuant to the City's Significance Determination Thresholds. Therefore, the project would not result in the loss of availability or prevention of future extraction of sand or gravel, and/or mineral resources, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR determined that impacts related to conversion of agricultural land and mineral resources would be less than significant, and no mitigation would be required. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

Greenhouse Gas Emissions

OMCPU Final PEIR

Consistency with Adopted Plans, Policies, and Regulations
Section 5.18 of the OMCPU Final PEIR evaluated whether implementation of the OMCPU would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs, or would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The plans, policies, and regulations in place at the time of preparation of the OMCPU Final EIR included Executive Order S-3-05, which established GHG reduction targets for years 2010, 2020, and 2050; Assembly Bill 32, which required CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020; and the Climate Change Scoping Plan, which included strategies and reduction measures to achieve these reduction goals. The OMCPU Program EIR determined that impacts associated with GHG emissions would be significant and unmitigated at the program level. Mitigation Framework GHG-1 required that future projects implemented in accordance with the OMCPU shall be required to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to business as usual (BAU), to meet year 2020 target levels. However, since future projects could potentially not meet the necessary reduction goals even with implementation of Mitigation Framework GHG-1, it was concluded that impacts would remain significant and unmitigated. The OMCPU contains policies that would reduce GHG emissions from transportation and operational building uses and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the OMCPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

Cumulative GHG Emissions

The OMCPU Final PEIR determined that impacts associated with cumulative GHG emissions would be significant and unmitigated at the program level. OMCPU Final PEIR Mitigation Framework GHG-1 required that future projects implemented in accordance with the OMCP to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to BAU, to meet Assembly Bill Year 2020 target levels. However, since future projects could potentially not meet the necessary reduction goals even with implementation of OMCPU Final PEIR Mitigation Framework GHG-1, it was concluded that impacts would remain significant and unmitigated. The OMCP contains policies that would reduce GHG emissions from transportation and operational building uses and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the OMCP would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

OMCPU Final PEIR Mitigation Framework GHG-2 requires future projects to demonstrate their avoidance of significant impacts related to long-term operational emissions. However, even with implementation of mitigation, impacts would remain significant and unmitigated as the analysis determined that the 9.1 to 11.4 percent reductions relative to BAU would fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to BAU. While the Mobility, Urban Design, and Conservation elements of the OMCPU included specific policies that work to minimize GHG emissions, such as requiring dense and compact development, encouraging efficient energy and water conservation design, and increasing transit accessibility, among others, the OMCPU's projected emissions would fall short of meeting the 28.3 percent reduction goal.

Project

Consistency with Adopted Plans, Policies, and Regulations

Since certification of the OMCPU Final PEIR, the City adopted a CAP in December 2015. The 2015 CAP outlined the actions the City would undertake to achieve its proportional share of State GHG emission reductions. The GHG emission reduction targets specified in the 2015 CAP included a 15 percent reduction in emissions (compared to year 2010 baseline emissions) by 2020, and a 50 percent reduction by year 2035. To achieve these goals, the City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the 2015 CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, which was the primary document used by the City to ensure a project-by-project consistency with the underlying assumptions in the 2015 CAP and thereby to that the specified emission reduction targets identified in the 2015 CAP are achieved.

The City subsequently adopted an updated CAP in 2022 that established a community-wide goal of net zero by 2035. The 2022 CAP also replaced the CAP Consistency Checklist with new CAP Consistency Regulations. However, the City included provisions in the 2022 CAP which allowed projects to rely on the 2016 CAP Consistency Checklist if the application was submitted and deemed complete prior to the adoption of the 2022 CAP Consistency Regulations (City of San Diego 2022b). This project qualified under the provisions of the 2022 CAP as an in-process project that is exempt from the 2022 CAP Consistency Regulations. Therefore, a CAP Consistency Checklist was completed for the project to demonstrate consistency with the City's GHG CEQA thresholds, that the project

would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and that the project would be consistent with the City's CAP. Based on the most recent CAP Annual Report, in 2019, total GHG emissions were 25 percent below the 2010 baseline (City of San Diego 2020).

The OMCPU Final PEIR Identified various policies and recommendations aimed to reduce GHG emissions of which support the City's reduction goals outlined in the CAP, which include reducing GHG emissions by 15 percent from the year 2010 baseline by year 2020 and reducing GHG emissions by 50 percent from the year 2010 baseline by year 2035. Therefore, in keeping with the policies in the OMCPUs, the project would be required to comply with the CAP Consistency Checklist. By implementing the measures outlined in the CAP Consistency Checklist, the project would meet the goals and strategies of the CAP.

CAP Consistency Checklist. The CAP Consistency Checklist includes a three-step process to determine if a project would result in a GHG impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's consistency with applicable strategies and actions of the CAP. Step 3 is to determine whether a project with a land use and/or zone designation change within a Transit Priority Area would be consistent with the assumptions of the CAP. Step 3 would only apply if Step 1 is answered in the affirmative under Option B, which applies to projects that are not consistent with the existing land use plan and zoning designations, and would result in an increased density within a Transit Priority Area. A CAP Consistency Checklist was completed for the project (RECON 2022d) and its consistency is presented below.

Completion of Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the project would be less GHG intensive when compared to the existing designations. The entire project site is zoned IBT-1-1 in the City's Official Zoning Map. The 15.78-net acre eastern half of the project site is designated as Industrial Employment in the General Plan and Business Park-Office Permitted in the Otay Mesa Community Plan. The 16.77-net acre western half of the project site is designated as Park in the General Plan and Otay Mesa Community Plan. The western half is anticipated to be developed as Grand Park in 2042. The project would be an interim use until the time that the City develops the park. The project would be consistent with the zoning and the land use designations of the eastern half of the project site, and would be inconsistent with the land use designations of the western half of the project site. GHG emissions were calculated for the project as well as for a project that is consistent with the existing zoning and land use designations. Under the existing zoning and land use designation, the project site could be developed with a 16.75-acre park and a 340,000-square-foot industrial park use which would generate 4,547 MT CO2E of GHGs annually. The project would generate a maximum of 3,186 MT CO2E of GHGs annually. Therefore, the project would be consistent with the growth projections utilized in the development of the CAP per Step 1(C).

Completion of Step 2: CAP Strategies Consistency of the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and action for reducing GHG emissions. The project would meet the applicable Step 2 CAP requirements by implementing the following design features:

- Utilizing plumbing fixtures consistent with the requirements specified in the CALGreen for non-residential buildings.
- Providing four electrical vehicle parking spaces with charging equipment installed ready for use.
- Designating four parking spaces for low-emitting, fuel efficient and carpool/vanpool spaces.
- Providing three long-term bicycle parking spaces.

These project features would be assured as a condition of project approval. Therefore, the project would be consistent with the CAP.

Step 3: Project CAP Conformance Evaluation would only apply if Step 1 is answered in the affirmative under Option B. As previously disclosed above, the project would be less GHG intensive when compared to the existing designations and therefore answered in the affirmative to 1C. Thus, Step 3 does not apply to the project.

Cumulative GHG Emissions
Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant.

Conclusion

The OMCPU Final PEIR identified potentially significant impacts related to greenhouse gas emissions, and identified Mitigation Framework GHG-1 and GHG-2. The project application was submitted and deemed complete prior to the adoption of the 2022 CAP Consistency Regulations, therefore prepared a CAP Checklist per the 2015 CAP consistent with OMCPU Final PEIR Mitigation Framework GHG-1 and GHG-2. The CAP Checklist determined that the project would be consistent with the City's CAP, and project-level impacts would be less than significant. Additionally, the project's consistency with the City's CAP Consistency Checklist demonstrates that the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant. Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCPU Final PEIR. The project would not result in a new significant impact, nor would a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR result.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified OMCPU Final PEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

Revisions to the project components evaluated under the PEIR are proposed with the current project. Through the environmental analysis conducted, the City has determined that the current project, subject of and evaluated under this Addendum would not have the potential to cause significant impacts to those issue areas beyond those analyzed. While these issues were not analyzed in detail, as outlined in CEQA Section 15128, there is no new information available that would indicate that these issues would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The OMCPU Final PEIR Chapter 9, Significant Unavoidable Environmental Effects/Irreversible Environmental Changes, identifies the following significant unmitigated impacts: transportation/circulation (capacity), utilities (solid waste), air quality (criteria pollutants, sensitive receptors), greenhouse gas emissions, and noise (traffic, stationary sources and construction).

As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the CPU PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified OMCPU Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

The project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified CPU PEIR.

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

The project shall be required to comply with the applicable mitigation measures outlined within the Mitigation Monitoring and Reporting Program (MMRP) of the previously certified PEIR (No. 30330/304032/SCH No. 2004651076) and those identified with the project-specific subsequent technical studies. The following MMRP identifies measures that specifically apply to this project.

A. GENERAL REQUIREMENTS: PART I – Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "**ENVIRONMENTAL/MITIGATION REQUIREMENTS**."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY –** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS: PART II – Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

   Qualified Biologist, Qualified Archaeologist, and Native American Monitor

   Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 1048583 and/or Environmental Document No .1048583, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

   Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

2. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining

documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
Not Applicable

4. **MONITORING EXHIBITS**: All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Document Submittal/Inspection Checklist

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Consultant Qualification Letters	Prior to Preconstruction Meeting
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources

MM-BIO-1: Non-native Grassland

Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Owner/Permittee shall make payment to the City Habitat Acquisition Fund (HAF) to mitigate for the loss of 11.30 acres of non-native grasslands (Tier IIIB). This fee is based on a mitigation ratio, per the City of San Diego Biology Guidelines, of 1:1 ratio. The ratio is 1:1 because the City has indicated it cannot guarantee that mitigation land it purchases with the funds would be within the MHPA. Therefore, the resulting total mitigation required for direct impacts to non-native grassland (Tier IIIB) shall be 11.30 acres outside the MHPA equivalent monetary contribution into the City's Habitat Acquisition Fund (HAF).

MM-BIO-2: Burrowing Owl

Prior to Permit or Notice to Proceed Issuance:

1. As this project has been determined to be BUOW occupied or to have BUOW occupation potential, the Applicant Department or Permit Holder shall submit evidence to the ADD of Entitlements and Multiple Species Conservation Program (MSCP) staff verifying that a Biologist possessing qualifications pursuant **"**Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Game. March 7, 2012 (hereafter referred as CDFG 2012, Staff Report), has been retained to implement a BUOW construction impact avoidance program.

2. The qualified BUOW biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City's BUOW requirements and subsequent survey schedule.

Prior to Start of Construction:

1. The Applicant Department or Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the project site; regardless of the time of the year. "Site" means the project site and the area within a radius of 450 feet of the project site. The report shall be submitted and approved by the Wildlife Agencies and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and BUOW locations on aerial photos.

2. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report - Appendix D

3. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of preconstruction/take avoidance surveys. Verification shall be provided to the City's Mitigation Monitoring and Coordination (MMC) and MSCP Sections. If results of the preconstruction surveys have changed and BUOW are present in areas not previously identified, immediate notification to the City and WA's shall be provided prior to ground disturbing activities.

During Construction:

1. **Best Management Practices shall be employed** as BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are BUOW occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.

2. **On-going BUOW Detection** - If BUOWs or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "B" shall be followed. NEITHER THE MSCP SUBAREA PLAN NOR THIS MITIGATION SECTION ALLOWS FOR ANY BUOWs TO BE INJURED OR KILLED OUTSIDE **OR** WITHIN THE MHPA; in addition, IMPACTS TO BUOWs WITHIN THE MHPA MUST BE AVOIDED.

   A. Post Survey Follow Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are <u>Not</u> Detected During the Initial Pre-Construction Survey - Monitoring the site for new burrows is required using CDFW Staff Report 2012 Appendix D methods for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete *(NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule).*

   1) If no active burrows are found but BUOWs are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.

   2) If no active burrows are found but BUOWs are observed during follow up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's MMC and MSCP Sections shall be notified and any portion of the site where owls have been sites and that has not been graded or otherwise disturbed shall be avoided until further notice.

   3) If a BUOW begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section B must be followed.

   4) Any actions other than these require the approval of the City and the Wildlife Agencies.

   B. Post Survey Follow Up if Burrowing Owls and/or Active Natural or Artificial Burrows are detected during the Initial Pre-Construction Survey - Monitoring the site for new burrows is required using Appendix D CDFG 2012, Staff Report for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete *(NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol).*

   1) This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – **all direct and indirect impacts to BUOWs within the MHPA <u>SHALL</u> be avoided.**

   2) If one or more BUOWs are using any burrows (including pipes, culverts, debris piles *etc.*) on or within 300 feet of the proposed construction area, the City's MMC and MSCP Sections shall be contacted. The City's MSCP and MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist appropriate City biologist for on-going coordination with the Wildlife Agencies and the qualified consulting BUOW biologist. No construction shall occur within 300 feet of an active burrow without written

concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.

a) **Outside the Breeding Season** - If the BUOW is using a burrow on-site outside the breeding season (i.e., September 1 – January 31), the BUOW may be evicted after the qualified BUOW biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

b) **During Breeding Season** - If a BUOW is using a burrow on-site during the breeding season (Feb 1-Aug 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the BUOWs can be evicted. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

3. **Survey Reporting During Construction -** Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's MMC, and MSCP Sections and the Wildlife Agencies and must be provided in writing (as by e-mail) and acknowledged to have been received by the required Agencies and DSD Staff member(s).

Post Construction:

1. Details of all surveys and actions undertaken on-site with respect to BUOWs (i.e. occupation, eviction, locations etc.) shall be reported to the City's MMC Section and the Wildlife Agencies within 21 days post-construction and prior to the release of any grading bonds. This report must include summaries off all previous reports for the site; and maps of the project site and BUOW locations on aerial photos.

<u>Historical Resources</u>

MM-HIST-1: Archaeological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American

monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD
    1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
    2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
    3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search
    1. The PI shall provide verification to MMC that a site-specific records search (quarter-mile radius) has been completed. Verification includes but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
    2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
    3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Preconstruction (Precon) Meetings
    1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
        a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
    2. Identify Areas to be Monitored
        a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
        b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur
    a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
    b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching
    1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
    2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
    3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
    4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process
    1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
    2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
    3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance
   1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
      a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
      b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
      c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification
   1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
   2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site
   1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
   2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
   3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American
   1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
   2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
   3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
   4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
   5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
      a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
      b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
      c. To protect these sites, the landowner shall do one or more of the following:
         (1) Record the site with the NAHC;
         (2) Record an open space or conservation easement; or
         (3) Record a document with the County. The document shall be titled “Notice of Reinterment of Native American Remains” and shall include a legal description of the property, the name of the property owner, and the owner’s acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
   2. The following procedures shall be followed.
      a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.
      b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV–Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
      c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III–During Construction and IV-Discovery of Human Remains shall be followed.

d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction
   1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
   2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
      a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
      b. Recording Sites with State of California Department of Parks and Recreation
      The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
   2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
   3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
   4. MMC shall provide written verification to the PI of the approved report.
   5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts
   1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
   2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
   3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification
   1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an

appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV–Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

IX. CERTIFICATION

Copies of the addendum, the certified PEIR, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

1/30/2023

D. Marshall, Senior Planner
Development Services Department

Date of Final Report

Attachments:

Figure 1: Regional Location
Figure 2: Project Location on Aerial Photograph
Figure 3: Site Plan
Figure 4: Operational Noise Contours
Figure 5: Construction Noise Contours

REFERENCES

Alden Environmental, Inc. (Alden)
2022 Biological Technical Report for the Britannia Airway Logistics Center Project. December 29.

California Department of Transportation (Caltrans)
2013 Technical Noise Supplement. November.

California Public Utilities Commission (CPUC)
2020 2020 California Renewables Portfolio Standard Annual Report. November 2020.

GEOCON, Inc. (GECON)
2021 Geotechnical Investigation, Sanyo Logistics Center. April 16.

K&S Engineering
2022a Priority Development Project Storm Water Quality Management Plan, Britannia Airway Logistics Center. December 20.

2022b Drainage Study for Britannia Airway Logistics Center. December 20.

Linscott, Law & Greenspan, Engineers (LLG)
2023 Access Analysis, Britannia Airway Logistics Center. January 3.

Office of Environmental Health Hazard Assessment (OEHHA)
2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

RECON Environmental, Inc. (RECON)
2021 Waste Management Plan for the Britannia Airway Logistics Center Project. December 20.

2022a Air Quality CalEEMod Emission Calculation Output. May 25.

2022b Results of Historical Resources Survey for the Britannia Airway Logistics Center Project. May 27.

2022c Noise Modeling. October 25.

2022d Climate Action Plan Consistency Checklist. November 4.

San Diego, City of
2014a Fiscal Year 2014 Otay Mesa Public Facilities Financing Plan. Available at: https://www.sandiego.gov/sites/default/files/241-287_0.pdf

2014b Otay Mesa Community Plan. Available at: https://www.sandiego.gov/sites/default/files/otay_mesa_cmmty_plan_update_final-central_village_cpa.pdf

2014c Otay Mesa Community Plan Update Final Program Environmental Impact Report. Available at: https://www.sandiego.gov/sites/default/files/1_0_final_eir.pdf

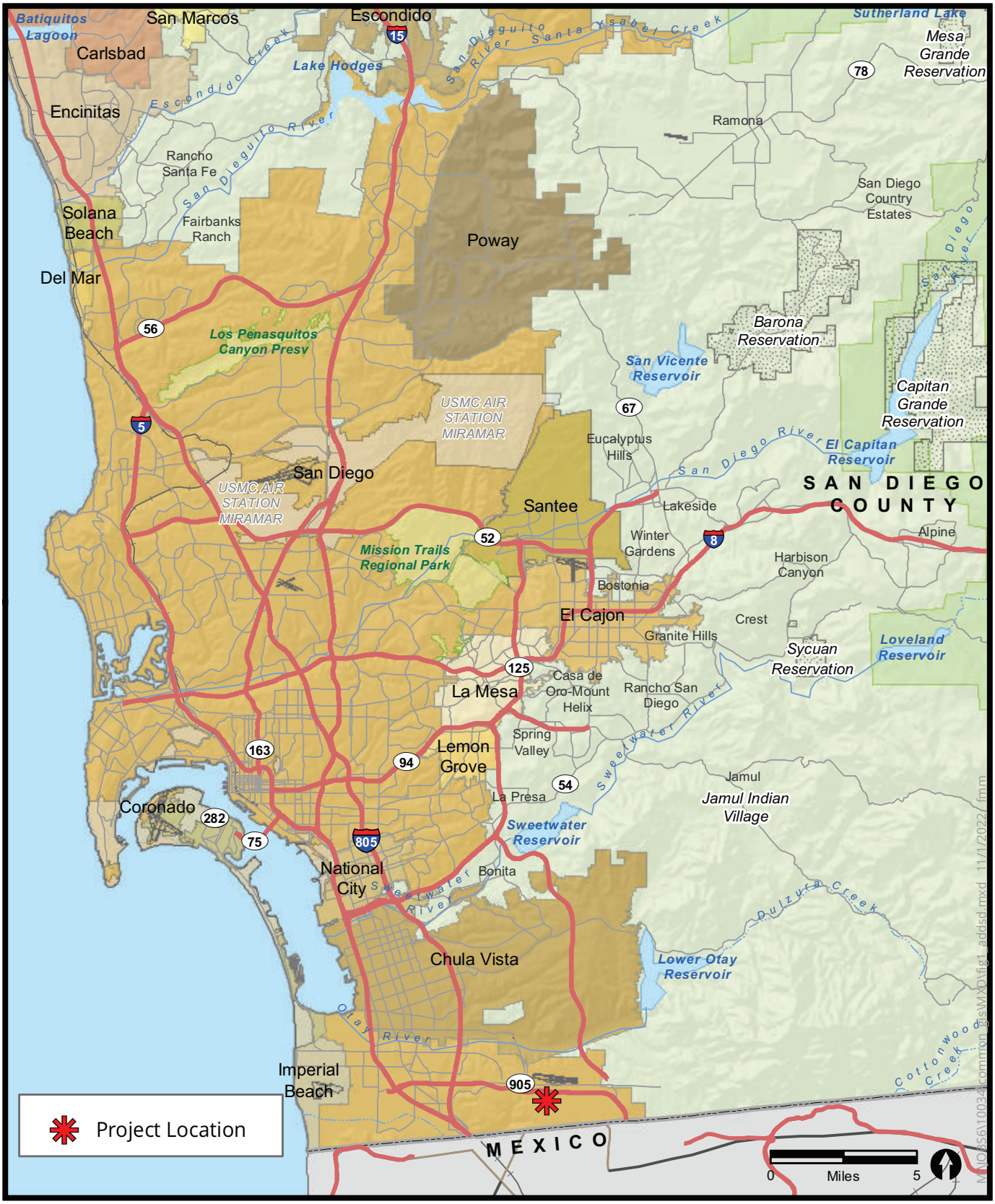
2015 City of San Diego Climate Action Plan. Available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

2018 Land Development Code Biology Guidelines. Adopted September 1999. Last amended February 1, 2018 by Resolution No. R-311507. Available at https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf

2020 City of San Diego Climate Action Plan Annual Report 2020. Available at https://www.sandiego.gov/2020cap.

2022a California Environmental Quality Act Significance Determination Thresholds. September.

2022b City of San Diego Climate Action Plan. Our Climate, Our Future. Available at https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf.



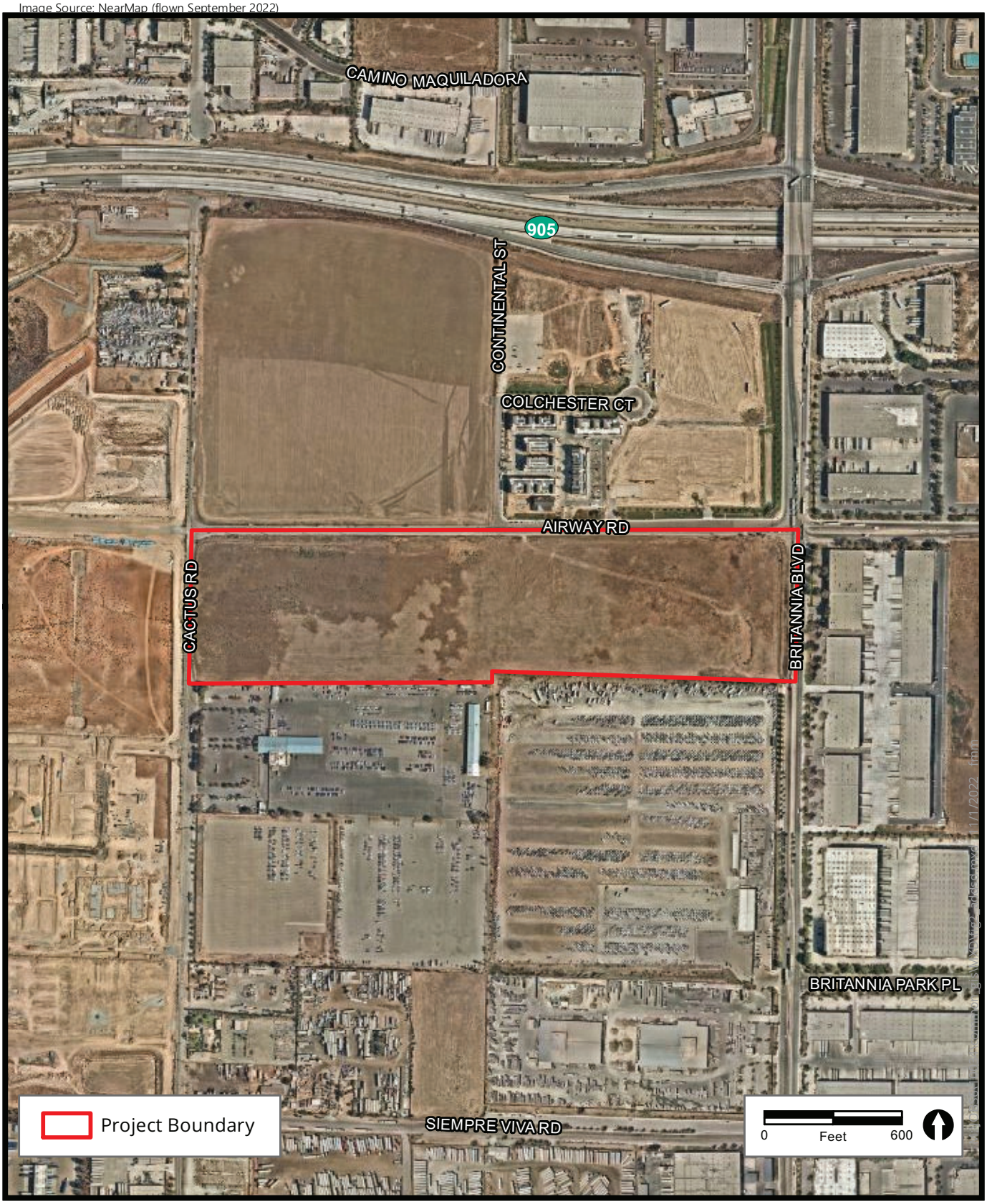
Regional Location

Badiee Truck Park and Storage/Project No. 1048583

City of San Diego – Development Services Department

FIGURE No. 1

Image Source: NearMap (flown September 2022)

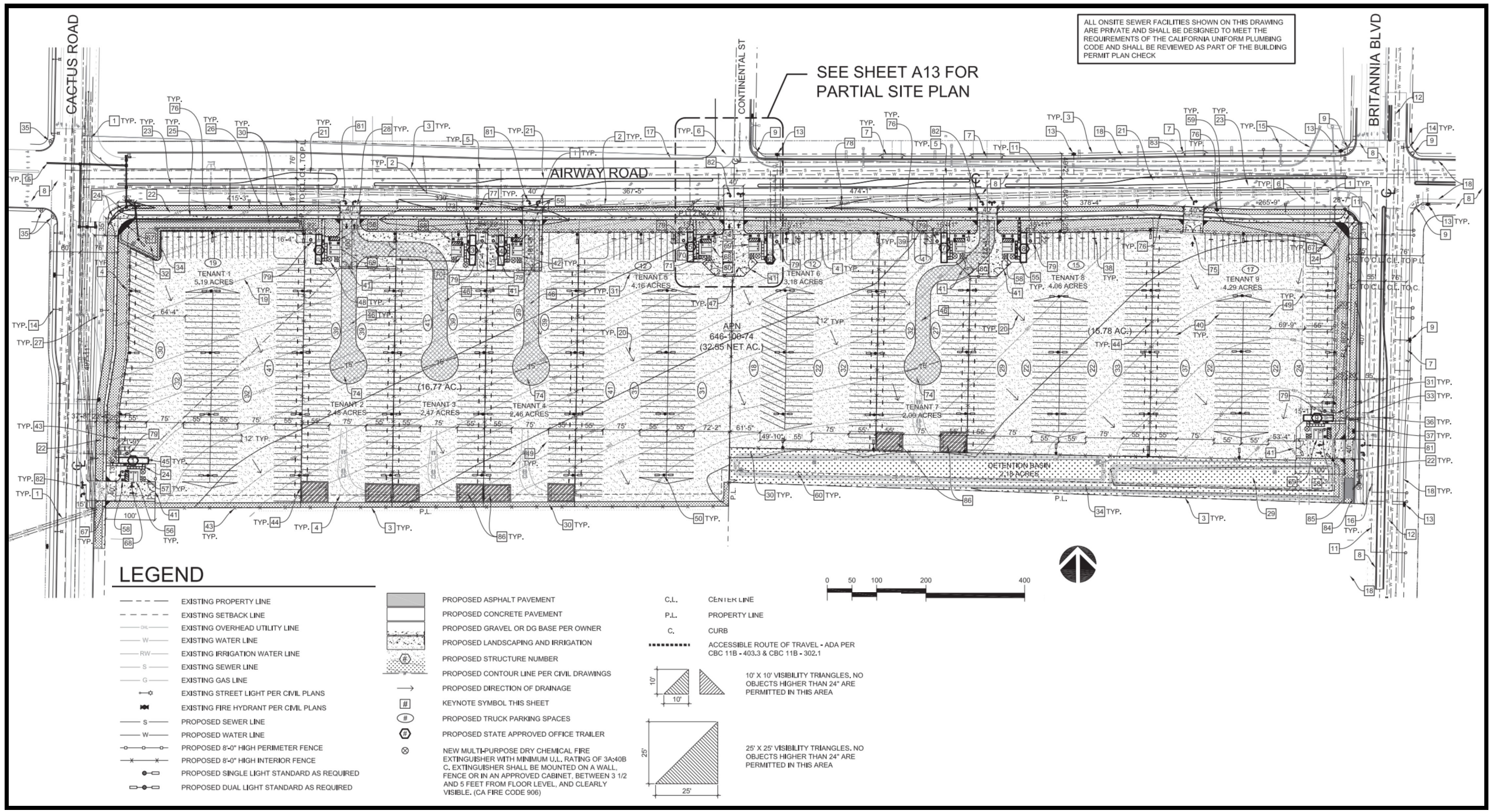


Project Location on Aerial Photograph

Badiee Truck Park and Storage/Project No. 1048583

City of San Diego – Development Services Department

FIGURE No. 2

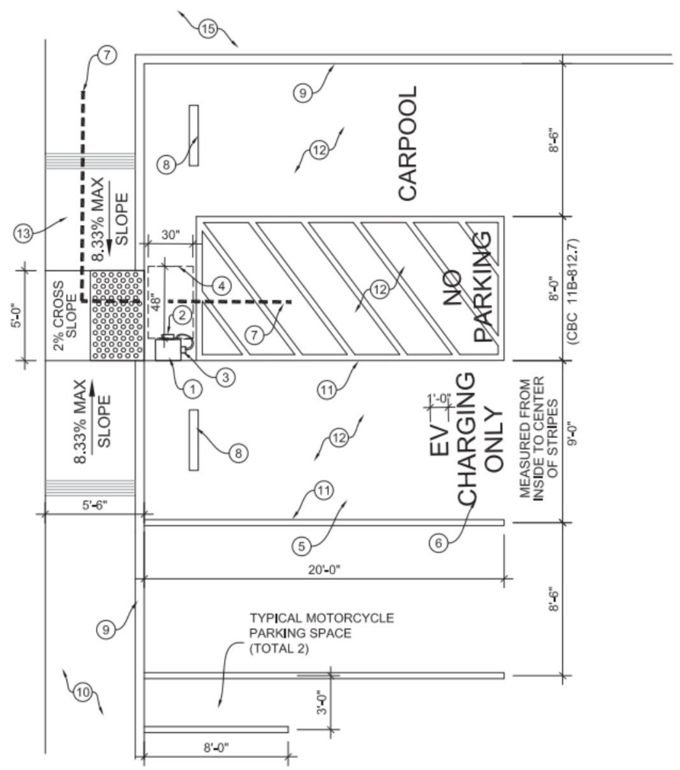


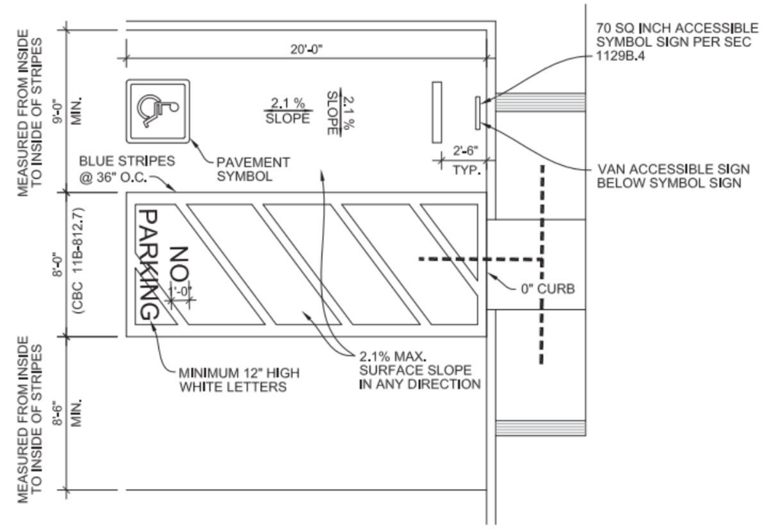
Site Plan

Badiee Truck Park and Storage/Project No. 1048583
City of San Diego - Development Services Department

FIGURE
No. 3a

TYPICAL ACCESSIBLE, EV & MOTORCYCLE PARKING SPACE





ACCESSIBLE PARKING NOTES

DETECTABLE WARNING TO BE SLIP-RESISTANT, HAVE VISUAL CONTRAST MATERIAL WITH ADJOINING SURFACES, LIGHT ON DARK OR DARK ON LIGHT AS AN INTEGRAL PART OF FULL WIDTH AND DEPTH WALKING SURFACE WITH RAISED TRUNCATED DOMES PER CBC FIGURE 11B-23A:

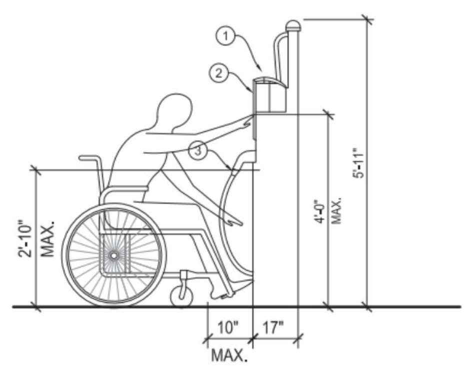
- 0.9" BASE DIAMETER TAPEING TO 1.45" TOP DIAMETER
- 0.2" HEIGHT
- 2.35" CENTER TO CENTER SPACING

ALL SURFACE FOR ACCESSIBLE PARKING STALLS AND ACCESS AISLES SHALL COMPLY WITH CBC 11B 302, CBC 11B 502.4 :

a. MAXIMUM 2.1% SLOPE IN ALL DIRECTIONS
b. NO CHANGES IN LEVEL

EV CHARGING STATION NOTES

1. ALL OPERABLE PARTS SHALL COMPLY WITH CBC SECTION 11B-309, 11B-228.3.12 & 11B-812.2.
2. POINT OF SALE DEVICES PROVIDED FOR EV CHARGES TO COMPLY WITH CBC SECTION 11B-707.2, 11B-707.3, 11B-707.7.2 & 11B-707.9.



UNOBSTRUCTED FRONT REACH CBC SECTIONS 11B-228.3.1.2, 11B-812.2 & 11B-309

SCALE: 1/2" = 1'-0"

EV CHARGING STATION KEYNOTES

1. PROPOSED EV CHARGING STATION CHARGINGPOINT CT4000 OR EQUAL W/ P.O.S. (TOTAL 2)
2. PROPOSED POINT OF SALE (P.O.S.) DEVICE PER CBC SECTIONS 11B-702.2, 11B-707.3, 11B-707.7.2 & 11B-707.9
3. PROPOSED CHARGING CORD STORAGE SHALL COMPLY WITH CBC SECTION 11B-309
4. PROPOSED CLEAR FLOOR SPACE SHALL COMPLY WITH CBC SECTION 11B-305
5. PROPOSED STANDARD ACCESSIBLE EVCS SHALL COMPLY WITH CGBC SECTIONS 4 & 5
6. PROPOSED 12" HIGH LETTER SURFACE MARKING SHALL COMPLY WITH CBC SECTION 11B-812.9
7. PROPOSED ACCESSIBLE ROUTE OF TRAVEL TO COMPLY WITH CBC SECTIONS 11B - 403.2, 11B-812.5.1 & 11B -812.5.2
8. PROPOSED 6" HIGH CONCRETE WHEEL STOP PER CITY STANDARDS
9. PROPOSED 6" HIGH CURB PER CITY STANDARDS
10. PROPOSED ASPHALT PAVEMENT
11. PROPOSED CONTRASTING COLOR STRIPES (GREEN) @ 32" O.C. (BLUE COLOR SHALL NOT BE USED)
12. PROPOSED 1:48 MAX. SURFACE SLOPE IN ANY DIRECTION PER CBC SECTION 11B-812.3
13. PROPOSED ACCESSIBLE CONCRETE RAMP & WALKWAY
14. PROPOSED TRUNCATED DOMES
15. PROPOSED LANDSCAPE AND IRRIGATION PER LANDSCAPE PLAN

TENANT TABLE

TENANT	AREA	TRUCK SPACES	ASPHALT	CONCRETE	DG BASE	LANDSCAPE	VEHICLE SPACES	TRASH ENCL.	DOUBLE GATE
1	5.19 AC.	154	1,220 S.F.	3,580 S.F.	197,281 S.F.	23,742 S.F.	3	1	1
2	2.48 AC.	72	1,220 S.F.	9,164 S.F.	93,484 S.F.	4,130 S.F.	3	1	1
3	2.47 AC.	74	1,220 S.F.	6,525 S.F.	95,304 S.F.	4,629 S.F.	3	1	1
4	2.46 AC.	72	1,220 S.F.	3,794 S.F.	98,165 S.F.	4,101 S.F.	3	1	1
5	4.16 AC.	115	1,220 S.F.	4,488 S.F.	167,905 S.F.	7,679 S.F.	3	1	1
6	3.18 AC.	84	1,220 S.F.	3,629 S.F.	126,109 S.F.	6,958 S.F.	3	1	1
7	2.00 AC.	57	1,220 S.F.	4,561 S.F.	79,987 S.F.	5,185 S.F.	3	1	1
8	4.06 AC.	121	1,220 S.F.	3,634 S.F.	159,536 S.F.	8,101 S.F.	3	1	1
9	4.29 AC.	122	1,220 S.F.	4,130 S.F.	161,387 S.F.	21,391 S.F.	3	1	2
DB	2.26 AC.	-	-	-	-	98,446 S.F.	3	1	2
TOTAL	32.55 AC.	871	10,980 S.F.	43,505 S.F.	1,179,158 S.F.	196,500 S.F.	27	9	10

FENCE TABLE

SYMBOL	TYPE	DESCRIPTION	LOCATION	HEIGHT	LENGTH
—•—•—	CHAINLINK W/ GREEN SHADE CLOTH	NEW	PROJECT PERIMETER STREET FRONTAGE	8'-0"	3,353 FT.
—×—×—	CHAINLINK W/ GREEN SHADE CLOTH	NEW	PROJECT INTERIOR AND REAR	8'-0"	6,079 FT.

LIGHT STANDARD TABLE

SYMBOL	NO.	TYPE	DESCRIPTION	LUMENS	KELVIN	HEIGHT	LAMP
●—▭	30	SINGLE LIGHT FIXTURE	NEW	12,279	4000	30'-0"	LED
▭—●—▭	42	DUAL LIGHT FIXTURE	NEW	13,109	4000	30'-0"	LED

STRUCTURES TABLE

SYM.	AREA	HEIGHT	STATUS	DESCRIPTION	TENANT	OCCUP.	TYPE	USE	YEAR	USABLE SPACE
1	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	1	M	V-B	OFFICE	2008	225 S.F. (MIN.)
2	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	2	M	V-B	OFFICE	2008	225 S.F. (MIN.)
3	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	3	M	V-B	OFFICE	2008	225 S.F. (MIN.)
4	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	4	M	V-B	OFFICE	2008	225 S.F. (MIN.)
5	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	5	M	V-B	OFFICE	2008	225 S.F. (MIN.)
6	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	6	M	V-B	OFFICE	2008	225 S.F. (MIN.)
7	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	7	M	V-B	OFFICE	2008	225 S.F. (MIN.)
8	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	8	M	V-B	OFFICE	2008	225 S.F. (MIN.)
9	720 S.F.	12'-6"	USED	SINGLE STORY BUILDING	9	M	V-B	OFFICE	2008	225 S.F. (MIN.)
TOTAL	6,480 S.F.									

USABLE SPACE AREA CALCS

REQUIRED:		PROVIDED:	
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TENANT 1:	222 S.F.	TENANT 1:	225 S.F.
TOTAL:	2,000 S.F.	TOTAL:	2,025 S.F.

SITE KEYNOTES

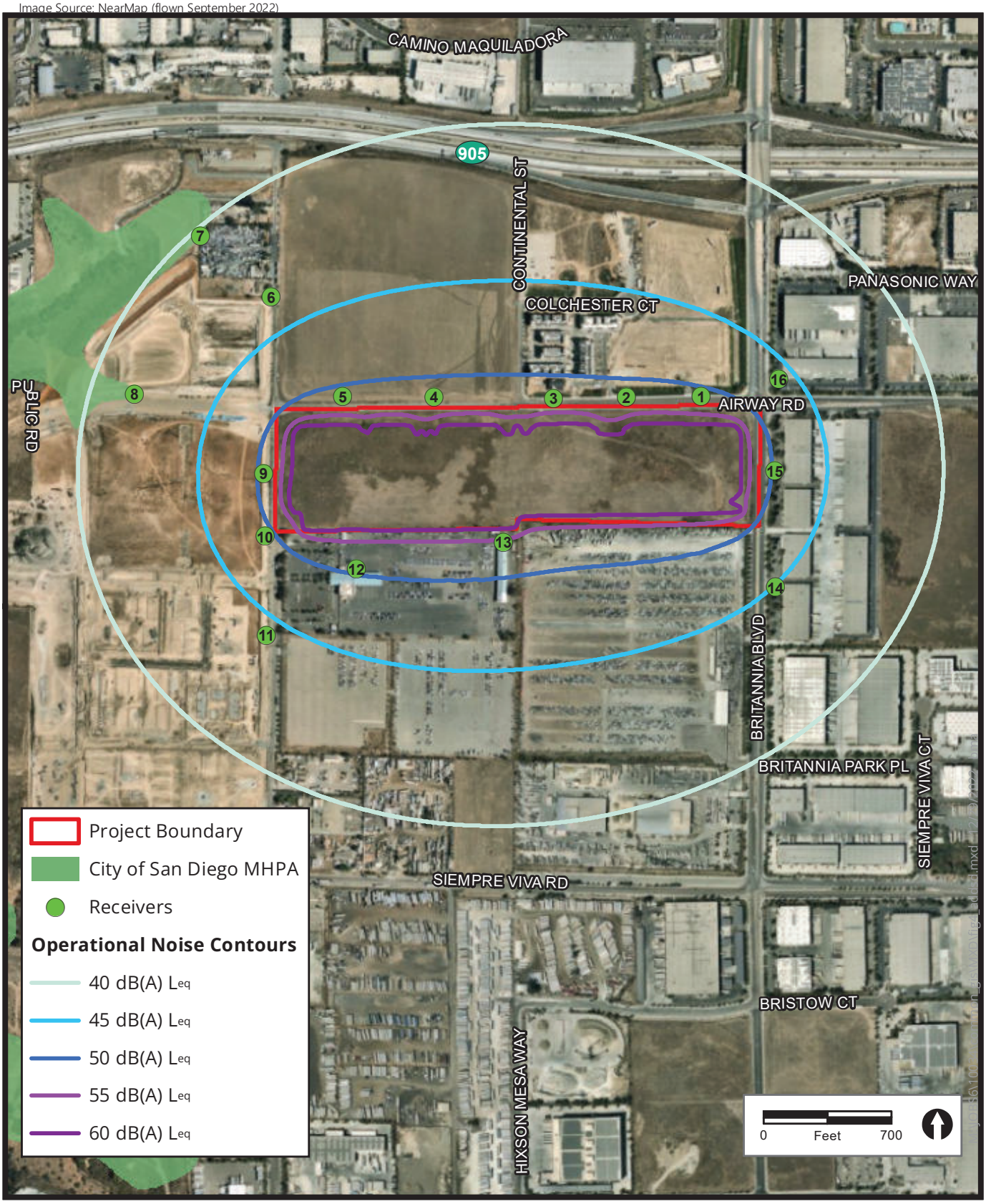
1. EXISTING ELECTRICAL POLE TO BE REMOVED & PLACED UNDERGROUND
2. EXISTING OVERHEAD ELECTRICAL LINES TO BE REMOVED & PLACED UNDERGROUND
3. EXISTING PROPERTY LINE - VERIFY WITH CIVIL ENGINEERING PLANS
4. EXISTING SETBACK LINE
5. EXISTING WATER MAIN - V.I.F.
6. EXISTING ASPHALT PAVEMENT - V.I.F.
7. EXISTING DRIVEWAY (NOT-A-PART) - V.I.F.
8. EXISTING STREET IMPROVEMENTS - V.I.F.
9. EXISTING ACCESSIBLE PEDESTRIAN RAMP - V.I.F.
10. EXISTING IRRIGATION WATER MAIN - V.I.F.
11. EXISTING SEWER MAIN - V.I.F.
12. EXISTING GAS MAIN - V.I.F.
13. EXISTING FIRE HYDRANT - V.I.F.
14. EXISTING STREET LIGHT - V.I.F.
15. EXISTING STORM DRAIN - V.I.F.
16. EXISTING SEWER MANHOLE - V.I.F.
17. EXISTING ASPHALT CURB - V.I.F.
18. EXISTING CONCRETE CURB, GUTTER & SIDEWALK - V.I.F.
19. PROPOSED CONTOUR LINES PER PRELIMINARY GRADING PLAN
20. PROPOSED DRAINAGE ARROW PER PRELIMINARY GRADING PLAN
21. PROPOSED CONCRETE STREET MEDIAN PER PRELIMINARY GRADING PLAN
22. PROPOSED LANDSCAPED PARKWAY PER LANDSCAPE DEVELOPMENT PLAN
23. PROPOSED STREET IMPROVEMENTS PER PRELIMINARY GRADING PLAN
24. PROPOSED ACCESSIBLE PEDESTRIAN RAMP PER PRELIMINARY GRADING PLAN
25. PROPOSED ACCESSIBLE 6' WIDE CONCRETE SIDEWALK PER PRELIMINARY GRADING PLAN
26. PROPOSED CONCRETE CURB AND GUTTER PER PRELIMINARY GRADING PLAN
27. PROPOSED STREET STRIPING PER PRELIMINARY GRADING PLAN
28. PROPOSED CONCRETE CURB-CUTS & DRIVEWAY PER CITY STANDARDS
29. PROPOSED PRIVATE DETENTION BASIN PER PRELIMINARY GRADING PLAN
30. PROPOSED LANDSCAPE AND IRRIGATION PER CITY STANDARDS
31. PROPOSED PRIVATE ON-SITE SEWER LINE
32. PROPOSED BIO-RETENTION PER PRELIMINARY GRADING PLAN
33. PROPOSED PUBLIC SEWER LATERAL PER PRELIMINARY GRADING PLAN
34. PROPOSED VEGETATED SLOPE PER PRELIMINARY GRADING PLAN
35. PROPOSED OFF-SITE ACCESSIBLE PEDESTRIAN RAMP BY OTHERS
36. PROPOSED PUBLIC ACP WATER LATERAL PER PRELIMINARY GRADING PLAN
37. PROPOSED PRIVATE ACP WATER LINE PER PRELIMINARY GRADING PLAN
38. PROPOSED 8" HIGH RAILROAD TIE OR EQUAL TRUCK WHEELSTOP
39. PROPOSED SEWER POC PER PRELIMINARY GRADING PLAN
40. PROPOSED 12'-0" WIDE x 55'-0" LONG TRUCK PARKING SPACE
41. PROPOSED ELECTRIC OPERATED SWINGING SECURITY GATE W/ KNOX BOX PER FIRE DEPT
42. PROPOSED PRIVATE ASPHALT PAVEMENT PER CITY STANDARDS
43. PROPOSED 8'-0" HIGH PERIMETER CHAINLINK FENCE W GREEN SHADE CLOTH
44. PROPOSED 8'-0" HIGH CHAINLINK FENCE WITH GREEN SHADE CLOTH
45. PROPOSED 720 S.F. USED STATE APPROVED RESTROOM TRAILER (TOTAL 9)
46. PROPOSED MIN. 30'-0" WIDE UNOBSTRUCTED FIRE APPARATUS ACCESS ROAD
47. PROPOSED CONCRETE PAVEMENT PER GRADING PLANS
48. PROPOSED CLASS 3A:40B/C FIRE EXTINGUISHER (CFC SECTIONS 5703.2.1 & 906) - 9
49. PROPOSED DECOMPOSED GRANITE / GRAVEL BASE PER PRELIMINARY GRADING PLAN
50. PROPOSED LIGHT STANDARD PER CITY OF SAN DIEGO
51. PROPOSED 12" HIGH, 1" STROKE CONTRAST ADDRESS #s PER COUNTY FIRE CODE 505.1
52. PROPOSED 6" CONCRETE WHEEL STOP PER ACCESSIBILITY STANDARDS (SEE A13)
53. PROPOSED ACCESSIBLE GROUND STRIPING (SEE A13)
54. PROPOSED ACCESSIBLE SIGNS (SEE A13)
55. PROPOSED PRE-ENGINEERED ACCESSIBLE RAMP WITH RAILING
56. PROPOSED 9'-0" x 20'-0" STANDARD VEHICULAR PARKING SPACE PER CITY STANDARDS
57. PROPOSED REFUSE & RECYCLABLE ENCLOSURE PER SDMC SECTION 142.0805 (TOTAL 9)
58. PROPOSED 9'-0" x 20'-0" ACCESSIBLE PARKING SPACE PER CITY OF SD STANDARDS
59. PROPOSED PROPERTY LINE - VERIFY WITH CIVIL ENGINEERING PLANS
60. PROPOSED SETBACK LINE PER CITY OF SAN DIEGO STANDARDS
61. PROPOSED PRE-ENGINEERED STAIRS WITH RAILING (SEE A13)
62. PROPOSED 6" CONCRETE OR ASPHALT CURB (SEE A13)
63. PROPOSED POTABLE WATER METER WITH BACKFLOW PREVENTER PER OWD
64. PROPOSED PUBLIC IRRIGATION WATER LATERAL PER PRELIMINARY GRADING PLAN
65. PROPOSED IRRIGATION WATER METER WITH BACKFLOW PREVENTER PER OWD
66. PROPOSED TRUNCATED DOMES (SEE A13)
67. PROPOSED VISIBILITY TRIANGLES PER CITY STANDARDS AND LEGEND THIS SHEET
68. PROPOSED ELECTRIC VEHICLE PARKING SPACE PER DETAIL THIS SHEET (TOTAL 4)
69. PROPOSED CARPOOL/ZERO EMISSION VEHICLE PARKING SPACE PER DETAIL THIS SHEET (3)
70. PROPOSED 3'-0" X 8'-0" MOTORCYCLE PARKING SPACE PER DETAIL THIS SHEET
71. PROPOSED 5'-0" X 7'-0" ANCHORED LONG-TERM BICYCLE COVERED LOCKABLE ENCLOSURE
72. PROPOSED ACCESSIBLE PEDESTRIAN CIRCULATION FROM PROW TO TENANT ENTRANCE
73. PROPOSED 3'-0" WIDE MANUALLY OPERATED SWINGING GATE
74. PROPOSED 75'-0" DIAMETER COMMERCIAL VEHICLE TURNAROUND
75. PROPOSED EXIT ONLY GATE, NO ENTRANCE FROM STREET
76. PROPOSED 8'-0" WIDE DG BASE CLASS 1 BICYCLE PATH PER ENGINEERING DRAWINGS
77. PROPOSED FIRE HYDRANT PER ENGINEERING DRAWINGS
78. PROPOSED STREET LIGHT PER ENGINEERING DRAWINGS
79. PROPOSED 225 S.F. (22'-0" x 15'11") USABLE SPACE OUTDOOR AMENITIES AREA PER SDMC 131.0665 (TOTAL 9 = 2,000 S.F.) WITH AMENITIES PER DETAIL ON SHEET L2
80. PROPOSED ELECTRIC VEHICLE CHARGING STATION PER DETAIL THIS SHEET (TOTAL 2)
81. PROPOSED RIGHT-IN AND RIGHT-OUT ONLY STRIPING
82. PROPOSED RIGHT-IN WITH RIGHT-OUT AND LEFT-OUT STRIPING
83. PROPOSED NO ENTRY WITH RIGHT-OUT EXIT ONLY STRIPING
84. PROPOSED TYPE H CURB & GUTTER PER SDG-151 AND ENGINEERING PLANS
85. PROPOSED MODULAR WETLAND UNIT BOX PER ENGINEERING PLANS
86. PROPOSED TURNAROUND AREA FOR SEMI TRUCKS

Site Plan

Badiee Truck Park and Storage/Project No. 1048583
City of San Diego - Development Services Department

FIGURE
No. 3b

Image Source: NearMap (flown September 2022)



Operational Noise Contours

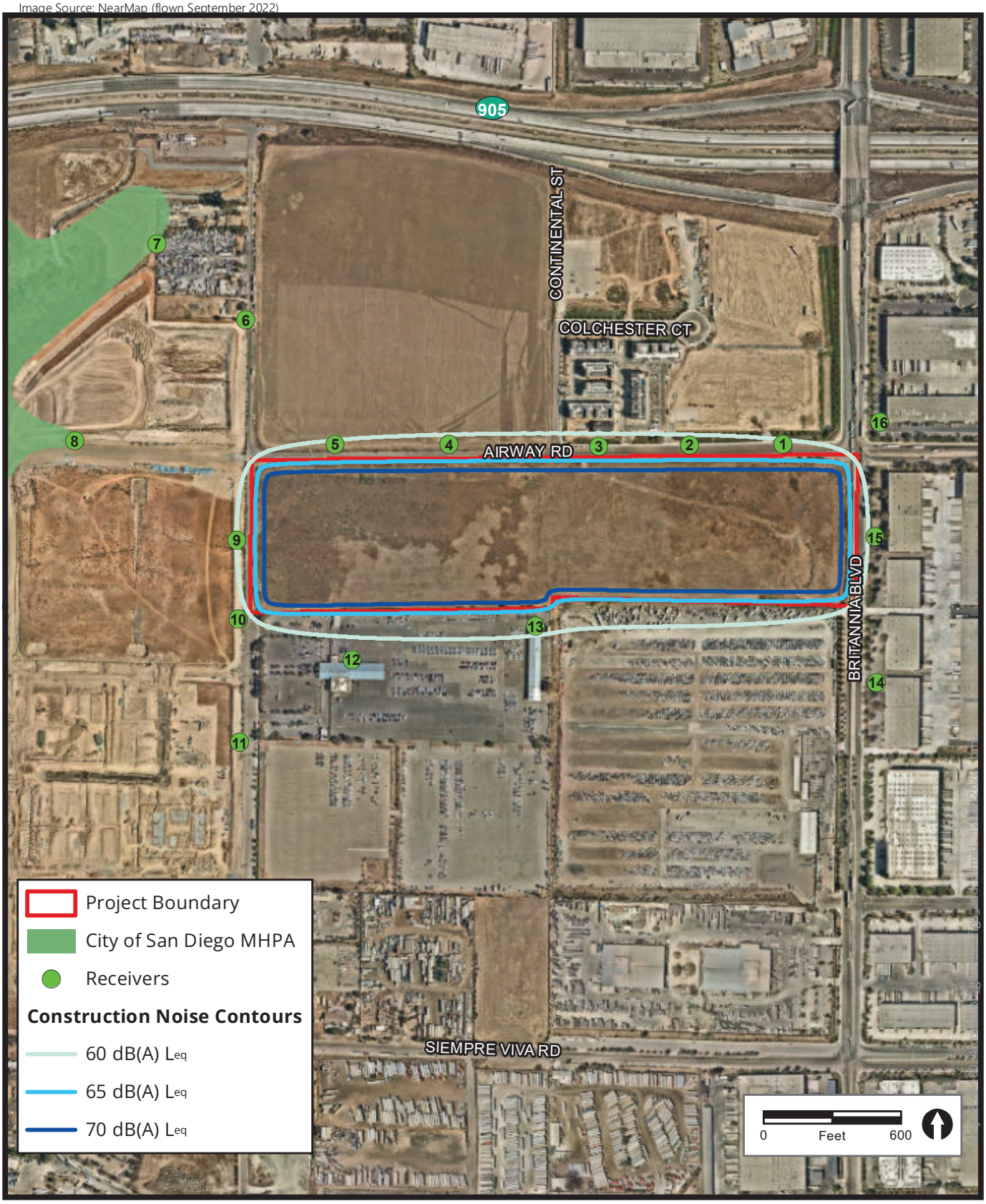
Badiee Truck Park and Storage/Project No. 1048583

City of San Diego – Development Services Department

FIGURE

No. 4

Image Source: NearMap (flown September 2022)



Construction Noise Contours

Badiee Truck Park and Storage/Project No. 1048583

City of San Diego – Development Services Department

FIGURE No. 5