



THE CITY OF SAN DIEGO

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. 1062231
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: **Exposition Way:** A GENERAL PLAN AMENDMENT and COMMUNITY PLAN AMENDMENT to change the land use designation from Community Commercial to Light Industrial and a REZONE to change the zone from CN-1-2 (Commercial Neighborhood) to IL-2-1 (Industrial-Light). No development is being proposed as part of this project. The vacant 2.01-acre project site is located northeast of the terminus of Exposition Way and north and west of Innovative Drive (Figure 1, Regional Location and Figure 2, Aerial View). The project site is within the Otay Mesa Community Plan, Community Plan Implementation Overlay Zone Type A, Brush Management, Very High Fire Hazard Severity Zone, Prime Industrial Lands, Airport Land Use Compatibility Overlay Zone (Brown Field Airport [BFA]), Airport Influence Area (BFA, Review Area 1), 65-70 Airport Noise Contour (CNEL), Airport Safety Zone 2 (BFA), and the Federal Aviation Administration Part 77 Notification Area (BFA). LEGAL DESCRIPTION: Lot 2 of Ocean View Village according to Map No. 16245 filed December 21, 2017; APN 645-050-4500. APPLICANT: OnPoint Development.

I. SUMMARY OF ORIGINAL PROJECT

In 2013, the Otay Mesa Community Plan (OMCP) underwent an update including a General Plan Amendment (GPA), Community Plan Amendment (CPA), 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 Community Plan Implementation Overlay Zone (CPIOZ), amendments to the City of San Diego (City) Land Development Code (LDC), and an update of the OMCP Public Facilities Financing Plan (PFFP). The overall impacts of the 2013 OMCP were evaluated in a Program Environmental Impact Report (EIR; Project No. 30330/304032; SCH No. 2004651076) that was certified by the San Diego City Council on March 11, 2014, via Resolution No. R-308810 (hereinafter referred to as the OMCP FEIR).

The OMCP provides for a long-range, comprehensive policy framework for growth and development in the Otay Mesa community through the year 2062. The OMCP 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 including, but not limited to, the following: allowing a distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services

needed to serve the planning area: creating distinct villages that include places to live, work, and recreate; identifying locations for diversified commercial uses that serve local, community, and regional needs; and ensuring sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center.

The OMCP includes 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. 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 OMCP FEIR concluded that the OMCP would result in significant and unavoidable 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 with implementation of the mitigation framework included in the OMCP FEIR: land use, biological resources, historical resources, hydrology/water quality, geology, and paleontological resources. All other impacts analyzed in the OMCP FEIR were determined to be less than significant.

The OMCP identifies five planning districts interconnected through activities and infrastructure. The project site is located within the Northwest District. The project site is currently designated as Community Commercial which permits commercial, retail, and civic uses serving broader community within approximately three to six miles. The site is currently zoned Commercial - Neighborhood (CN-1-2).

The OMCP identified a CPIOZ Type A which applies to areas designated for commercial and industrial uses, including the project site. The CPIOZ Type A allows any project that is consistent with the community plan, the base zone regulations, and the supplemental regulations to be processed ministerially in accordance with the procedures of the CPIOZ (Municipal Code Chapter 13, Article 2, Division 14). The applicable CPIOZ Type A supplemental regulations require the following:

- Preparation of archaeological, paleontological, and biological surveys for any site that has not been previously graded or developed, stating that there is no presence of archaeological, paleontological, and biological resources on-site.
- Compliance with specific policies of the OMCP Urban Design Element for commercial or industrial projects.
- Construction of abutting streets to the classification identified in the Mobility Element of the OMCP.
- Documentation from a California Registered Traffic Engineering stating that the project's traffic volumes would be less than 1,000 average daily trips (ADT).

Any development that does not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone shall be required to apply for a Process 3 CPIOZ Type B permit which would require a discretionary review and shall be required to meet the purpose and intent of the regulations of the underlying zone and the supplemental development regulations.

II. SUMMARY OF PROPOSED PROJECT

The 2.01-acre project is a GPA and CPA to redesignate the land use from Community Commercial to Light Industrial and a Rezone from the Commercial Neighborhood (CN-1-2) zone to the Light Industrial (IL-2-1) zone. No development is proposed with this project. The proposed rezone would remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses. The following uses that are currently not allowed in the existing CN-1-2 zone would be allowed with the proposed rezone to the IL-2-1 base zone:

- Commercial Services (Building Services, Funeral and Mortuary Services, Off-site Services, Radio and Television Studios, and Tasting Rooms)
- Vehicle & Vehicular Equipment Sales & Service (Commercial Vehicle Repair & Maintenance, Commercial Vehicle Sales & Rentals, Personal Vehicle Repair & Maintenance, Personal Vehicle Sales & Rentals, Vehicle Equipment & Supplies Sales & Rentals)
- Separately Regulated Vehicle & Vehicular Equipment Sales and Service Uses (Outdoor Storage & Display of New, Unregistered Motor Vehicles as a Primary Use)
- Distribution and Storage (Equipment & Materials Storage Yards, Moving & Storage Facilities, Distribution Facilities)
- Industrial (Light Manufacturing, Marine Industry, Research & Development, Testing Labs, Trucking & Transportation Terminals)
- Separately Regulated Industrial Uses (Artisan Food and Beverage Producer, Newspaper Publishing Plants, and Processing & Packaging of Plant Products & Animal By-products Grown Off-premises)

Although a development project is not proposed as part of the proposed actions, for disclosure purposes the analysis references potential construction of up to a maximum 43,560-square-foot building which is the maximum potential building size based on the parcel size of 87,120 square feet and a floor area ratio of 0.5. Additionally, the analysis assumes any future development would be subject to the CPIOZ Type A supplemental regulations, detailed in Section I, which would limit projects to those that would generate no more than 1,000 ADT. Any proposed use that would generate 1,000 ADT or more would be subject to a subsequent environmental review, consistent with the CPIOZ Type B.

III. ENVIRONMENTAL SETTING

The 2.01-acre project site is undeveloped and located just northeast of the current terminus of Exposition Way, north of Corporate Center Drive (Figure 1, Regional Location and Figure 2, Aerial View). The project site borders industrial land uses located immediately to the south and west. Lands to the south are zoned IL-2-1- (Industrial Light), and undeveloped, disturbed vacant lands to the north and east are zoned AR-1-1 (Agricultural Residential). The project site is physically separated from existing residential development to the north by approximately 0.1 mile; however, the vacant parcel immediately adjacent to the project site to the north is zones RM-2-4 (Residential-

Multiple Unit) for residential use (Figure 3, Project Site and Surrounding Zoning). To the west is undeveloped land consisting of natural open space, zoned OC-1-1 (Open Space-Conservation). The project site is relatively flat with site elevations ranging from 518 feet above mean sea level (MSL) to 524 feet above MSL.

The project site is within the Otay Mesa Community Plan, Community Plan Implementation Overlay Zone – Type A, Brush Management, Very High Fire Hazard Severity Zone, Prime Industrial Lands, Airport Land Use Compatibility Overlay Zone (Brown Field Airport [BFA]), Airport Influence Area (BFA, Review Area 1), 65-70 dBA Airport Noise Contour (CNEL), Airport Safety Zones 2 (BFA), and the Federal Aviation Administration Part 77 Notification Area (BFA). Services and utilities are available to the site and are within nearby public roadways.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the OMCP FEIR (Project No. 30330/304032/SCH No. 2004651076), per Resolution No. R-308810 on March 11, 2014. Based on all available information, the analysis in this EIR Addendum, and in light of the entire record, the City has determined pursuant to Section 15162 and 15164 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to new significant environmental effects or a substantial increase in the severity of impacts identified in the previous FEIR;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous FEIR to disclose new significant environmental effects or a substantial increase in the severity of impacts previously identified in the FEIR; or
- There is no new information of substantial importance, which was not known and could not have been known at the time the previous FEIR was certified, that shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous FEIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous FEIR;
 - 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 EIR 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 conditions 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 EIR Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The OMCP has been incorporated by reference pursuant to CEQA Guidelines Section 15150.

Public review of this EIR Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the environmental issues analyzed in detail in the previously certified OMCP FEIR as well as the environmental analysis for the project pursuant to the CEQA. The analysis in this document evaluates the adequacy of the OMCP FEIR and documents that the currently proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified FEIR. As no development is proposed, the analysis is based on allowed uses under the proposed IL-2-1 zone including application of the existing Otay Mesa CPIOZ Type A and CPIOZ Type B.

The OMCP FEIR identified significant unavoidable impacts relative to air quality, greenhouse gas (GHG) emissions, noise, transportation/circulation, and utilities. The OMCP FEIR identified significant but mitigated impacts to Land Use, Biological Resources, Hydrology/Water Quality, Historical Resources, Paleontological Resources, and Geology. Impacts associated with visual effects and energy were found to be less than significant. An overview of the project's impacts in relation to the previously certified OMCP FEIR is provided in Table 1.

Environmental Issues	OMCP FEIR Finding	Project	New Mitigation?	Project Resultant Impact
Land Use	Significant but mitigated	No new impacts	No	Less than significant
Visual Effects and Neighborhood Character	Less than significant	No new impacts	No	Less than significant
Air Quality/Odor	Significant, unavoidable	No new impacts	No	Impacts would remain significant and unavoidable
Biological Resources	Significant but mitigated	No new impacts	No	Less than significant
Historical Resources	Significant, but mitigated	No new impacts	No	Less than significant
Human Health/ Public Safety/ Hazardous Materials	Significant, but mitigated	No new impacts	No	Less than significant
Hydrology/Water Quality	Significant but mitigated	No new impacts	No	Less than significant
Geology/Soils	Significant but mitigated	No new impacts	No	Less than significant

Table 1 Impact Assessment Summary				
Environmental Issues	OMCP FEIR Finding	Project	New Mitigation?	Project Resultant Impact
Energy Conservation	Less than significant	No new impacts	No	Less than significant
Noise	Significant, unavoidable	No new impacts	No	Impacts would remain significant and unavoidable
Paleontological Resources	Significant but mitigated	No new impacts	No	Less than significant
Transportation/Circulation	Significant, unavoidable	No new impacts	No	Impacts would remain significant and unavoidable
Public Services and Recreation	Less than significant	No new impacts	No	Less than significant
Public Utilities	Significant, unavoidable	No new impacts	No	Impacts would remain significant and unavoidable
Water Supply	Less than significant	No new impacts	No	Less than significant
Population and Housing	Less than significant	No new impacts	No	Less than significant
Agricultural and Mineral Resources	Less than significant	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Significant, unavoidable	No new impacts	No	Impacts would remain significant and unavoidable

Land Use

OMCP FEIR

Land Use is discussed in Section 5.1 of the OMCP FEIR that concluded that implementation of the OMCP would not result in impacts related to conflicts with applicable local and regional land use plans. Therefore, impacts were identified to be less than significant.

The OMCP FEIR identified that residential and industrial uses collocated in proximity to one another could result in incompatible land use impacts. The OMCP FEIR further identified that future development projects would be required to comply with the collocation policies of the General Plan and Community Plan Update (CPU) to reduce or avoid potential land use incompatibility impacts. The OMCP FEIR determined that compliance with the CPU and General Plan policies, along with local, state, and federal regulations, would reduce potential impacts of collocation to below a level of significance. The CPU would require 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. Through implementation of the measures identified in Section 5.6, the potential environmental impacts resulting from change in land use designations in accordance with the CPU were determined to be less than significant.

The OMCP FEIR identified that the development footprint of the CPU would encroach into sensitive Environmentally Sensitive Lands (ESL) areas. 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 CPU area. However, future projects would require subsequent environmental review and compliance with CPU policies, development standards, as well as adherence to the ESL regulations, Historical Resources regulations, and site-specific mitigation, as applicable, in accordance with the mitigation framework. Therefore, program-level impacts were concluded to be mitigated to below a level of significance.

Potentially significant impacts of future development on land designated as Multi-Habitat Plan Area (MHPA) by the City's Multiple Species Conservation Program (MSCP) Subarea Plan were identified in the OMCP FEIR. The impacts identified were associated with indirect impacts wherever development and human activity would interface with MHPA lands. The OMCP FEIR concluded that impacts could be significant, but through compliance with established standards and regulations and as well as the mitigation framework would serve to reduce impacts to below a level of significance to MHPA Lands.

Project

The project site is located within the Northwest District of the OMCP area and is directly adjacent to the Brown Field Airport District that is characterized as light and heavy industrial. The project would include a GPA and CPA to amend the OMCP land use designation of the project site from Community Commercial to Light Industrial. Additionally, the proposed Rezone would change the site's base zone from Commercial (CN-1-2) to Light Industrial (IL-2-1). The proposed Rezone would allow for light industrial uses that would be consistent with the existing land use and zoning designations located adjacent to the eastern and southern project boundaries, and along the western portion of the northern project boundary. However, the site immediately adjacent to the north could potentially be developed with residential use in the future, which could result in land use incompatibilities if noise generating features of a future industrial use is not appropriately sited. The OMCP anticipated potential land use compatibility conflicts between industrial and residential land uses and incorporated policies specifically focused on ensuring compatibility between these uses. Applicable policies that would apply to future development of the site are listed in Table 2, including an explanation of how the policy would serve to ensure land use conflicts and incompatibilities would be avoided.

Furthermore, application of the OMCP CPIOZ Type A would limit the intensity of light industrial development on the site to those uses that would generate less than 1,000 ADT, avoiding potential incompatibilities associated with a high trip generation use. Any proposed development that would generate 1,000 ADT or more would be subject to a future discretionary review consistent with the OMCP CPIOZ Type B.

City General Plan/Otay Mesa Community Plan

The project would be consistent with the City of Villages Strategy goals, City General Plan and OMCP policies as detailed in Table 2. Specifically, the OMCP emphasizes the need to enhance and sustain Otay Mesa's strong economic base and provide sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center (City of San Diego 2014). Table 2 also discusses specific

policies that would be implemented on the site that would ensure land use compatibility with surrounding land uses.

Table 2 General Plan and Otay Mesa Community Plan Policy Consistency	
General Plan Land Use and Community Planning Element: City of Villages Strategies	
<p>Goal: Sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center</p>	<p>The project would allow for Light Industrial development on the project site which would support Otay Mesa as a subregional employment center by allowing development of uses such as light manufacturing, distribution and storage uses.</p>
<p>Goal: A land use pattern that is compatible with existing and planned airport operation</p>	<p>The project would allow for Light Industrial development within Safety Zone 2 of Brown Field Airport. Light industrial uses which could include light manufacturing, distribution and storage uses would be compatible with Safety Zone 2. Future development would be subject to the development regulations applicable to the City's Airport Land Use Compatibility Overlay Zone (ALUCOZ) and would require an Land Use Compatibility Plan (ALUC) consistency determination and a Federal Aviation Administration (FAA) determination of No Hazard to Air Navigation.</p>
<p>Policy LU-2.4-4: Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.</p>	<p>The project would result in a Rezone to Light Industrial which would be consistent with the zoning and land use designation of the parcels to the east and the south. The project site is physically separated from existing residential development by approximately 0.1 mile to the north; however, the vacant parcel immediately adjacent to the project site to the north is designated for residential use. At the time a specific project is proposed, consistency with OMCP policies, General Plan Noise Element policies, and compliance with the City's landscape regulations would be required to ensure compatibility between land uses. For example:</p> <ul style="list-style-type: none"> • OMCP and General Plan policies would address the orientation of the building and siting of noise generating uses (such as loading docks) away from sensitive use areas. • Noise attenuation measures could be required to ensure noise levels at adjacent properties are consistent with applicable limits. • Truck storage and loading areas would need to be screened from view and walls and landscaping proposed to ensure land use compatibility. <p>Application of the CPIOZ Type A for any project generating less than 1,000 ADT and the requirement for a future discretionary review for any project generating 1,000 ADT or more would ensure OMCP policies are implemented that avoid land use incompatibilities through buffers and other design measures.</p>

Table 2 General Plan and Otay Mesa Community Plan Policy Consistency	
Otay Mesa Community Plan	
Goal: Sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center	The project would support additional light industrial development in Otay Mesa.
Goal: A land use pattern that is compatible with existing and planned airport operation	The project would allow for Light Industrial development within Safety Zone 2 of Brown Field Airport. Light industrial uses which could include light manufacturing, distribution and storage uses would be compatible with Safety Zone 2. Future development would be subject to the development regulations applicable to the City's ALUCOZ and would require an ALUC consistency determination and an FAA determination of No Hazard to Air Navigation.
Goal: An effective transit network that provides fast and reliable service to local and regional destinations	The Otay Mesa Community Plan Mobility Element identifies Vista Santo Domingo, which currently dead ends just north of the project site, as a two-lane collector that may ultimately connect the project site to the residential community to the north. The project would not preclude the ultimate connection of Vista Santo Domingo to the south, through to Expedition Way.
Policy LU-2.4-4: Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.	The project would support additional industrial land uses in Otay Mesa. Future development would be subject to review for consistency with OMCP Design Guidelines and City landscape regulations which would ensure appropriate buffering and landscaping is installed.
Goal: Functional industrial corridors with a high-quality design standard	<p>Future industrial development would be required to comply with the design guidelines of the OMCP Urban Design Element. Specifically, industrial design measures include:</p> <ul style="list-style-type: none"> • Creating a visual and distance separation between the public right-of-way and industrial uses such as auto dismantling, truck transportation terminals, and other uses that create noise, visual, or air quality impacts. • Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening. <p>Compliance with these measures would ensure consistency with this goal in creating high quality designed industrial corridors.</p> <p>Application of OMCP policies would ensure that future development of the site would be consistent with the existing surrounding development in terms of use, bulk and scale and would not result in an adverse aesthetic impact to the community. Compliance with these measures would ensure consistency with this goal in creating high-quality designed industrial corridors.</p>

Overall, the project site would best serve the City and the Otay Mesa community as a light industrial use rather than commercial based on existing patterns of industrial land uses in the immediate vicinity. The project would complement the adjacent properties to the south and east which are zoned for Light Industrial. Additionally, as presented in Table 2, the project would be consistent with relevant City policies relating to Light Industrial development. Additionally, application of the CPIOZ Type A supplemental regulations for any project generating less than 1,000 ADT would ensure OMCP policies are implemented that would avoid land use incompatibilities through buffers and other design measures.

The proposed rezone would not adversely affect the availability of commercial properties in the community. An undeveloped commercially zoned parcel is located just west of the project site. Additionally, both developed and undeveloped commercial properties are available at Otay Mesa Road and Corporate Center Drive. The Palm Promenade, a large commercial center, is located within a 3.3-mile drive from the project site. A future commercial center is also planned at the northeast corner of Otay Mesa Road/Ocean View Hills Parkway, which would eventually offer commercial opportunities approximately 1.4 miles southwest of the project site. The existing and planned capacity for commercial land use within the Otay Mesa community, combined with the demand for industrial land uses supports the need for the proposed Rezone from a land use perspective and would not conflict with General Plan goals for a balanced land use plan supporting the City of Villages strategy. Therefore, the project would not conflict with or be incompatible with the adjacent land uses or relevant land use plans. Impacts would be less than significant.

City of San Diego Municipal Code/Land Development Code

The purpose of the City's 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. The project site is located outside of and not adjacent to MHPA; however, the site has the potential to support burrowing owl habitat and is therefore considered ESL.

The project is a GPA/CPA and Rezone and no development is proposed as part of the project. Therefore, impacts to ESL would not occur as a result of this action; however, future development could result in impacts to burrowing owl habitat. Consistent with the OMCP FEIR mitigation framework, the project includes mitigation measure LU-2 which requires future projects to comply with the City's 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, as detailed in the Mitigation Monitoring and Reporting Program (MMRP) of the OMCP FEIR which is hereby incorporated by reference (see Section VIII). Implementation of mitigation measure LU-2 would ensure that future development would be consistent with the City's ESL regulations specifically associated with potential burrowing owls and impacts associated with such would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would result in a new significant impact, nor would it result in substantial increase in the severity of impacts from

that described in the OMCP FEIR result. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to land use.

Visual Effects and Neighborhood Character

OMCP FEIR

Section 5.2 of the OMCP FEIR provides an analysis of visual effects and neighborhood character impacts associated with the OMCP Update. 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 OMCP FEIR concluded that implementation of the CPU 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 CPU and to prevent impacts to views of public resources, the CPU included designating view corridors and gateways through plan policies and project design features. With compliance with the CPU policies as well as inclusion of these project design features, impacts to public views would be less than significant.

The OMCP FEIR 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 CPU. The OMCP FEIR determined that vacant, graded areas within the Northwest District are not considered visually sensitive and future development would improve visual compatibility with existing development. The plan envisioned the conversion of parcels and agricultural uses in this part of the planning area to industrial uses, anticipating that these industrial uses would be large warehouse-type structures and automotive lots. The OMCP FEIR determined that this intensification of industrial uses in this area would be consistent with the existing character of this part of the Northwest District, and that impacts would be less than significant.

Through implementation of the plan update, the visual character of the CPU area would become more urbanized. The land use and development design guidelines and policies of the CPU are intended to ensure that future development within the CPU 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 CPU. 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.

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 CPU. Impacts would be less than significant.

The OMCP FEIR identified that the CPU 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 CPU. Therefore, impacts would be less than significant. Overall, adherence to existing policies and regulations, as well as implementation of the CPU policies would ensure that potential impacts would be below a level of significance.

Project

The project site is located within the Northwest District of the Otay Mesa community as delineated in the OMCP. The Northwest District, as shown in Figure 2-2 of the OMCP, consists of a mix of industrial, residential, open space and commercial uses. The project site is bordered by existing industrial land uses located immediately to the south. Land to the west is open space and land to the immediate north and east is vacant undeveloped land. According to Figure 5.2-8 of the OMCP FEIR, there are no view corridors or gateway areas adjacent to or in proximity of the project site. Additionally, scenic amenities, such as public views of canyons and mesas, are not within the viewshed of the project site.

The project is a GPA, CPA and Rezone and no development is proposed as part of the project. Therefore, the proposed project would have no potential to impact the existing visual character of quality of the site. However, future development has the potential to result in development that would change the visual character and quality of the project site, from currently undeveloped land to an industrial building. However, a light industrial land use would be consistent with the character of the industrial business park uses immediately south of the project site. Additionally, the site is not visible from the residential areas to the north of the project site due to intervening topography. Future development would be required to adhere to General Plan land use policies to ensure consistency in size and scale of surrounding land uses. Additionally, the OMCP includes design guidelines applicable to industrial development and implementation of these guidelines would ensure that development of the site would be consistent with the existing surrounding development in terms of use, bulk and scale and would not result in an adverse aesthetic impact to the community. 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 OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Air Quality

OMCP FEIR

Section 5.3 of the OMCP FEIR provides an analysis of air quality impacts associated with the OMCP.

The OMCP FEIR determined that development occurring as a result of implementing the CPU 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 CPU and the traffic generated under the CPU would result in fewer emissions than the adopted community plan upon which the current RAQS is based, resulting in a less than significant impact.

The OMCP FEIR concluded that the CPU could result in air quality impacts related to criteria pollutant emissions from construction and operation of a project within the CPU area. The OMCP FEIR included mitigation measure 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 measure 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, such as residential development, through the use of landscaping, open space or other techniques. However, the OMCP FEIR determined that, while the mitigation framework and CPU 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.

The OMCP FEIR identified impacts to sensitive receptors associated with carbon monoxide (CO) hotspots and diesel particulate matter (DPM) would be less than significant, as there would be no harmful concentrations of CO 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 CPU 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.

Industrial uses could generate air pollutants, and without appropriate controls, air emissions associated with planned industrial uses could represent a significant adverse air quality impact as it relates to stationary sources. The OMCP FEIR included mitigation measure AQ-3, which requires an emissions inventory and health risk assessment to be prepared for any new facility that would have the potential to emit toxic air contaminants. However, even with implementation of the mitigation framework, impacts associated with stationary source emissions would remain significant and unavoidable. In addition, the OMCP FEIR 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 OMCP FEIR included mitigation measure AQ-4, which requires a health risk assessment to be prepared for any project locating sensitive receptors closer than their recommended buffer distances to toxic air emitters. However, this impact likewise would remain significant and unavoidable.

The OMCP FEIR 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 OMCP FEIR concluded that since the CPU did not include any new sources of odor that would affect sensitive receptors, impacts associated with odors would be less than significant.

Project

Plan Consistency

The project proposes a GPA, CPA and Rezone to change the allowable uses within the project site from commercial to industrial. A proposed change to the adopted OMCP land use plan could create an inconsistency relative to current air quality plans; however, based on trip rates from the City's Trip Generation Manual (City of San Diego 2003), industrial uses would typically generate less vehicle trips than commercial which would ensure an inconsistency with air quality plans would be avoided. Additionally, the CPIOZ Type A limits development on the site to uses that would generate less than 1,000 ADT. Any use that would generate 1,000 ADT or more would be subject to discretionary review. Therefore, the project would not conflict with existing air quality plans and impacts would be less than significant.

Construction and Operational Emissions

Future development of the site with industrial land uses would have similar construction air quality emissions as development of the site with commercial uses because the scope of grading and construction would be similar for both uses due to FAR limitations.

Operational emissions associated with a future potential light industrial use are unknown as no specific project is proposed; however, the main contributor of operational emissions are typically vehicle trips. Application of the CPIOZ Type A would limit ministerial development on the site to uses that would generate less than 1,000 ADT. Any use that would generate 1,000 ADT or more would be subject to discretionary review which would allow for site-specific evaluation of operational emissions and identification of measures to ensure operational emissions are minimized to the extent feasible. OMCP FEIR mitigation framework AQ-2 specifies that development shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset impacts to air quality. Therefore, with application of the OMCP CPIOZ supplemental regulations, including the requirement for future discretionary review for any project generating more than 1,000 ADT, operational emission impacts would be consistent with the prior analysis in the OMCP FEIR and no new operational air quality impacts would occur.

Specific operational air emissions are not known at this time; therefore, consistent with the OMCP FEIR mitigation framework, mitigation measures AQ-1 and AQ-2, as detailed in the OMCP MMRP and incorporated herein by reference (see Section VIII) would apply to any future development on the project site. Implementation of mitigation measure AQ-1 would require the inclusion of the following design features to reduce air emissions:

- Minimizing simultaneous operation of multiple pieces of construction equipment;
- Use of more efficient, or low pollutant emitting, equipment, e.g., Tier III or IV rated equipment;

- Use of alternative fueled construction equipment;
- Dust control measures for construction sites to minimize fugitive dust, e.g., watering, soil stabilizers, and speed limits; and
- Minimizing idling time by construction vehicles.

Mitigation measure AQ-2 would require development that would significantly impact air quality, either individually or cumulatively, to receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. However, even with implementation of these measures, the OMCP FEIR determined that construction and operational related air quality impacts would remain significant and unavoidable at the program level. Although these mitigation measures would be implemented at a project-level to reduce air emissions, impacts would remain significant and unavoidable, consistent with the OMCP FEIR.

Sensitive Receptors/Collocation

The project site is adjacent to vacant land designated for residential use and the placement of an industrial use within the project site could result in air emissions such as ozone, particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead associated with future project operations.

The introduction of an industrial use within the project site could generate toxic air pollutants which could represent a significant adverse air quality impact, specifically related to adjacent residential uses and other sensitive receptors located in proximity to the project site. Future industrial development would be required to adhere to the Air Toxics "Hot Spots" Information and Assessment Act (State Assembly Bill [AB] 2588, 1987), requiring that any new facility proposed that would have the potential to emit toxic air contaminants would be required to assess air toxic problems that could result from their facility's emissions. Additionally, future development would be required to comply with the collocation policies of the General Plan and OMCP. These policies and standards include but would not be limited to special policies and performance standards for residential-industrial interface areas; truck circulation, and industrial design; and adherence to all relevant and mandatory air district, state, and federal controls on toxic air emission sources. The collocation of industrial development adjacent to residential land uses would require implementation of OMCP FEIR mitigation measure AQ-2 which would ensure implementation of site design features including buffers between air pollution sources and sensitive receptors using landscaping, open space, and other separation techniques. AQ-2 implements guidance contained in the California Air Resources Board and Air Pollution Control District guidance related to land use siting. Additionally, consistent with the OMCP FEIR mitigation framework, the project includes mitigation measures AQ-3 and AQ-4, as detailed in the OMCP MMRP, incorporated herein by reference (see Section VIII). Implementation of mitigation measure AQ-3 requires any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, to prepare an emissions inventory and Health Risk Assessment. Implementation of mitigation measure AQ-4 would require certain identified industrial uses (as identified in OMCP FEIR Table 5.3-7), or those locating air quality sensitive receptors closer than the recommended buffer distances, to prepare a Health Risk Assessment. However, even with implementation of these measures, the OMCP FEIR determined that impacts would remain significant and unavoidable at the program level. Although these mitigation measures would be implemented at a project-level to reduce collocation impacts, impacts would remain significant and unavoidable, consistent with the OMCP FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Biological Resources

OMCP FEIR

Section 5.4 of the OMCP FEIR provides an analysis of biological resource impacts associated with the OMCP. The OMCP FEIR stated that implementation of the CPU has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA. 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 OMCP FEIR concluded that future projects would be required to implement a mitigation framework including 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, BIO-1 requires future projects to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl 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 burrowing owl shall be included in a Conceptual Burrowing Owl 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 the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

The OMCP FEIR concluded that future development, including construction or extension of CPU 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 OMCP FEIR's mitigation framework includes measure BIO-2, which requires a site-specific biological resource survey for projects that may have a potential to impact to areas within the MHPA. Implementation of this mitigation measure would ensure impacts would be less than significant.

The OMCP FEIR determined that future projects within the CPU 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. Measure BIO-1 would reduce impacts to sensitive habitat to a less than significant level. In addition, compliance with CPU policies and established development standards and regulations would reduce impacts to sensitive habitats to a less than significant level.

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

In regard to invasive plant impacts, the OMCP FEIR stated that impacts could be potentially significant due to the introduction of invasive plants within the MHPA during future grading and development. The OMCP FEIR stated that the introduction of invasive species into the MHPA would be addressed at the project-level and would be mitigated through implementation of the mitigation framework measure LU-2, reducing impacts to a less than significant level.

The OMCP FEIR concluded that future projects implemented in accordance with the CPU 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, California Department of Fish and Wildlife, and the City, and would thus require a deviation from the ESL regulations. The OMCP FEIR determined that future projects implemented in accordance with the CPU which cannot demonstrate compliance with CPIOZ A because impacts to wetlands/jurisdictional resources cannot be avoided would be required to implement mitigation measure BIO-4, which would reduce impacts to wetlands to a less than significant level.

The OMCP FEIR stated 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 OMCP FEIR determined that impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU would be mitigated to a less than significant level with implementation of mitigation measures BIO-1 through BIO-4 and LU-2.

Project

Sensitive Plants and Animals/ Sensitive Habitat

The project is a GPA, CPA, and Rezone and no development is proposed as part of the project; therefore, no impact to biological resources would occur; however, future development could result in impacts to sensitive species and sensitive habitat. Pursuant to OMCP FEIR Figure 5.4-1, the land cover type present on the project site is identified as Urban/Developed; however, as shown in OMCP FEIR Figures 5.4-2, 5.4-3, and 5.4.5 the project site is located adjacent to mapped sensitive vegetation communities and designated MHPA, Conserved Lands, and proposed OMCP open space lands. Future projects would be required to show project consistency with MHPA Land Use Consistency Guidelines, and all relevant Otay Mesa Multi-Habitat Planning Area Management Directives relating to any identified sensitive plants and animals. Therefore, consistent with the OMCP FEIR mitigation framework, the project includes mitigation measure BIO-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII), which requires a site-specific biological resource survey at the time a future development is proposed. Based on an evaluation of site conditions at

the time of development, additional focused presence/absence surveys may be required. Additionally, additional specific avoidance measures could be required if the biological survey results in the identification of burrowing owls or burrowing owl habitat on the project site. If at the time of future development, the site is determined to contain Environmentally Sensitive Lands (ESL), consistent with §143.0110, future discretionary permits may be required to ensure compliance with the ESL regulations. Additionally, future projects may also be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Implementation of mitigation measure BIO-1 would ensure that impacts to sensitive species and habitat associated with future development would be reduced to less than significant levels.

Migratory Wildlife

The project site is located approximately 0.2 mile to the south of Denney Canyon which supports Tier I and Tier II upland habitat, and adjacent to mapped sensitive vegetation communities and designated MHPA, Conserved Lands, and open space lands. The project is a GPA, CPA, and Rezone and no project development or construction activities are proposed; therefore, no impact to migratory wildlife would occur; however, future development, could interfere with nesting birds, reducing foraging habitat, and/or result in obstructing wildlife movement as a result of noise, construction activities, habitat loss and/or fragmentation. Consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure BIO-2, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure BIO-2 would require preparation of a site-specific biological resources survey (as detailed in mitigation measure BIO-1). The biological resources survey is required to include results of applicable protocol surveys, recommendations for additional measures to be implemented during construction-related activities, identification of the limits of any identified local-scale wildlife corridors or habitat linkages, and include recommendations to minimize or avoid impacts to wildlife movement. Implementation of mitigation measure BIO-2 would ensure that impacts to wildlife movement, including nesting birds, associated with future development would be reduced to less than significant levels.

Noise Generation

The project is a GPA, CPA, and Rezone; however, no development is proposed as part of the project. Therefore, impacts to biological resources would not occur; however, future development, could result in temporary construction noise and/or the introduction of permanent noise generators that could adversely impact sensitive species residing in and adjacent to MHPA lands. Consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measures BIO-3 and LU-2, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Mitigation measure BIO-3, requires implementation of mitigation BIO-1; implementation of mitigation measure LU-2 requires future projects to comply with the City's MHPA Land Use Adjacency Guidelines of the MSCP, including assurance that on-site noise levels would not disturb off-site nesting or breeding birds. Implementation of mitigation measures BIO-3 and LU-2 would reduce impacts associated with temporary and permanent noise generation to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Historical Resources

OMCP FEIR

Section 5.5 of the OMCP FEIR provides an analysis of historical resource impacts associated with the CPU. The OMCP FEIR 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 CPU area. The OMCP FEIR stated that future discretionary development projects could result in a potentially significant impact to prehistoric or historic resources and would be required to apply the mitigation framework for historical archaeological resources, including mitigation measures HIST-1 and HIST-2.

The OMCP FEIR determined that future development would have the potential to significantly impact religious or sacred sites within the CPU area. Development proposals requiring discretionary approval would be required to the mitigation framework for historical archaeological resources, including mitigation measure HIST-1.

The OMCP FEIR determined that future development would have the potential to significantly impact human remains within the CPU area. The OMCP FEIR stated that future discretionary projects would be required to implement the mitigation framework for historical archaeological resources, including mitigation measure HIST-1.

Project

The project is a GPA, CPA, and Rezone and no development or construction activities are proposed as part of the project; therefore, no potential impact to cultural resources would occur. However, future development that includes grading and excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure HIST-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Mitigation measure HIST-1 requires steps to be taken to monitor, identify, protect and preserve any historic resources found on-site. Implementation of mitigation measure HIST-1 would ensure that impacts related to historical/archeological resources would be reduced 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 OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Health and Safety/Hazardous Materials

OMCP FEIR

Section 5.6 of the OMCP FEIR provides an analysis of health and safety/hazardous materials impacts associated with the CPU. The OMCP FEIR identified impacts associated with wildfire hazards that would be potentially significant because new development in the wildland interface areas may expose people and structures to wildland fire hazards, representing a potentially significant impact at the program level. The OMCP FEIR included a mitigation framework with measure HAZ-1, which would reduce potential wildfire hazard impacts to a less than significant level. In addition, the OMCP FEIR determined that impacts associated with aircraft hazards would be potentially significant at the program level, as future projects developed in accordance with the CPU have the potential to conflict with FAA requirements and result in a significant aircraft hazards impact. The mitigation framework contained in the OMCP FEIR included mitigation measure HAZ-2, which would reduce potential aircraft hazard impacts to a less than significant level.

The OMCP FEIR concluded that impacts associated with hazardous substances would be less than significant, as future projects within the CPU area would be required to comply with policies contained in the General Plan, the CPU, 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 the California Department of Transportation. In addition, the CPU designated truck routes within the CPU area along 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 OMCP FEIR determined that impacts associated with hazardous sites would be potentially significant, as the Program EIR identified six sites within the CPU area as containing hazardous materials, which would present a significant hazard to the public or the environment. In addition, the presence of unknown hazardous sites within the CPU could result in significant impacts to future development within the CPU area. The mitigation framework contained in the OMCP FEIR included mitigation measure HAZ-3, which would reduce potential hazardous site impacts to a less than significant level.

Project

Wildfire Hazards/ Emergency Response

The project site is located within a designated Very High Fire Hazard Severity Zone and although there is industrial development adjacent to the southern boundary of the site, it is surrounded by open land with vegetated slopes. The project is a GPA, CPA, and Rezone and no development is proposed as part of the project. Therefore, impacts associated with wildfire would not occur; however, future development, if not designed safely could result in a significant wildfire impact. Future development would require adherence to Section 145.0701 through 145.0711 of the Land Development Code (LDC), and requirements of the California Fire Code to ensure the protection of

people and structures from potential wildland fire hazards. Additionally, consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure HAZ-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure HAZ-1 would require future development to incorporate design measures such as vegetation pruning and thinning that is consistent with the City's Brush Management regulations. Future development adherence to the LDC, and all current building and fire codes, along with implementation of mitigation measure HAZ-1 would ensure that impacts wildfire impacts would be reduced to less than significant levels.

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards. The project is a GPA, CPA, and Rezone and no development is proposed as part of the project. Therefore, impacts associated with implementation of or physical interference with an adopted emergency response or evacuation plan would not occur. Future development could result in temporary construction equipment staging areas which would be restricted to on-site locations, and evacuation controlled by authorities on public roadways would not be impeded by construction operations. Evacuation routes are located south of Exposition Way and Innovative Drive connecting to Otay Mesa Road and Interstate 805 which is 0.7 mile south of the project site. The project site would be directly linked to these evacuation routes via Exposition Way and Innovative Drive. The project site would have adequate emergency access and would not significantly impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Airport Safety Hazards

Review of the Brown Field Municipal Airport ALUCP Safety Compatibility Map (Exhibit 111-2) stated that the project site is located within Airport Influence Area (AIA) Review Area 1 and within Safety Zone 2 (Inner Approach/Departure Zone) (Figure 4, Brown Field Airport Influence Area and Figure 5, Brown Field Safety Compatibility Map). The project includes a GPA and CPA to redesignate the land use from Community Commercial to Light Industrial and a Rezone to change the zoning from the Commercial Neighborhood (CN-1-2) zone to the Light Industrial (IL-2-1) zone. This discretionary action requires ALUC consistency review. Although no development is specifically proposed, future development within the Light Industrial zone could include manufacturing, distribution and storage uses, which are considered compatible within Safety Zone 2. The proposed rezone or land use plan amendment will require an ALUC review for consistency with the Brown Field Municipal Land Use Compatibility Plan (ALUCP).

The LDC additionally regulates land uses within the ALUCOZ. The project site is within the ALUCOZ for Brown Field Airport which identifies supplemental development regulations and requires a compatibility review for new development.

The project site is also located within the FAA Part 77 Notification Area for Brown Field. Future development would be required to comply with Code of Federal Regulations, Title 14, Part 77 regarding Obstruction Evaluations/Airport Airspace analysis. Consistent with the OMCP FEIR

mitigation framework, the project includes mitigation measure HAZ-2, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure HAZ-2 would require the notification of the FAA as identified in City of San Diego Development Services Department Information Bulletin 520 and would be required to have a FAA determination of No Hazard to Air Navigation.

Overall, through implementation of ALUC procedures, regulatory compliance, and implementation of mitigation measure HAZ-2, impacts associated with airport safety would be reduced to less than significant levels.

Hazardous Substances

The project is a GPA, CPA, and Rezone and no development is proposed as part of the project. Future development of the site with light industrial land uses under the proposed land use designation and zone could include, but is not limited to, agricultural equipment repair shops, funeral and mortuary services, distribution facilities, and other light industrial uses that could generate hazardous emissions.

The vacant property adjacent to the project site to the north is designated for residential use and there is a developed residential community 0.1 mile from the project site to the north. Construction and operation of future uses within the project site could result in the transport, use, and disposal of hazardous waste. Existing federal, state, and local regulations and procedures pertaining to the handling, storage, and transport of potentially hazardous materials would apply to all future development of the site. Future development of the project site would be required to comply with the collocation policies of the City's General Plan, which are intended to reduce or avoid potential land use incompatibility impacts, including hazardous materials. Additionally, the OMCP includes development policies and design guidelines for residential-industrial interface areas as a means to avoid potential impacts associated with collocation of these uses as it relates to Light Industrial uses, the following policies and design guidelines would be applicable:

- **2.2-4:** Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.
- **2.4-4:** Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.
- **4.1-10:** Create a visual and distance separation between the public right-of-way and industrial uses such as auto dismantling, truck transportation terminals, and other uses that create noise, visual, or air quality impacts. Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening.
- **8.7-5:** Maintain an adequate buffer with transitional uses between land uses that allow sensitive receptors and the truck routes.

There is no school within 0.25 mile from the project site; therefore, future light industrial development would not generate emissions near a school. Through application of regulatory controls and General Plan and OMCP policies associated with future development on the site, impacts associated with handling of hazardous materials would be reduced to less than significant levels.

Hazardous Sites

The project site was not identified on the Department of Toxic Substance Control Cortese List; however, as stated above, the OMCP FEIR identified six sites within the CPU area as containing hazardous material. As shown in Figure 3-1 of the Hazardous Materials Technical Study prepared for the OMCP FEIR (Geocon 2012), the project site is not located in proximity to any of the aforementioned hazardous material sites. The nearest site is located approximately 0.5 mile to the east and is the Auto Recycling site located at 980 Otay Valley Road. However, consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure HAZ-3, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure HAZ-3 would require a Phase I Site Assessment, consultation with the appropriate regulatory agencies if needed, and verification that any potential health risk has been remediated in accordance with all applicable local, state and federal regulations. The requirement for future development to implement mitigation measure HAZ-3 would reduce significant impacts related to on-site contamination to a less than significant level.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Hydrology and Water Quality

OMCP FEIR

Section 5.7 of the OMCP FEIR provides an analysis of hydrology and water quality impacts associated with the CPU. The OMCP FEIR 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. The OMCP FEIR included a mitigation framework including mitigation measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual. Future projects would be required to implement this measure and would reduce impacts associated with runoff to a less than significant level.

The OMCP FEIR determined that impacts to natural drainage systems would be potentially significant, as buildout in accordance with the CPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, would reduce impacts to natural drainage systems to a less than significant level.

The OMCP FEIR concluded that impacts associated with flow alteration would be potentially significant, as future development within the CPU area would potentially impact the existing course and flow of flood waters due to the presence of floodplains within the CPU area. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, and would reduce impacts associated with flow alteration to a less than significant level.

The OMCP FEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the CPU 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. Commercial development could result in discharge of sediment, nutrients, organic compounds, oxygen-demanding substances, pesticides, and bacteria and viruses. Projects would be required to prepare a Storm Water Pollution Prevention Plan. Development of parks, schools, roads, and other public infrastructure would contribute to any of the identified pollutants noted above. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-2 would reduce impacts associated with water quality to a less than significant level.

Project

The project is a GPA, CPA and Rezone and no development is proposed as part of the project. Therefore, no hydrological or water quality impacts would occur as a result of this project. However, future development of the project site could result in impacts related to hydrology such as increased storm water runoff, changes to the site's natural drainage systems, and on- and off-site flow alteration due to changes to conditions associated with construction and future operation.

Stormwater Runoff

The project site is currently vacant and undeveloped. Future development of the project site would result in the construction of impervious surfaces which could increase the amount and rate of on-site runoff and result in an alteration to drainage patterns. Future development would be required to adhere to applicable regulations, policies and planning guidance related to storm water run-off. Specifically, the OMCP contains policies related to the goal of providing a reliable system of storm water facilities to serve the existing and future needs of the community. Specifically, Public Facilities, Services, and Safety Element Policies 6.3-1, 6.3-2, and 6.3-3 implement this goal through the requirement that future projects use sustainable infrastructure design to capture and control runoff using Drainage Design Standards, encouraging the use of low impact development (LID) design to exceed regulations set forth in the Storm Water Standards, and improving surface and/or subsurface drainage facilities in conjunction with private development projects (City of San Diego 2014).

According to the City's Storm Water Requirements Applicability Checklist, future development would be a Priority Development Project and a Storm Water Quality Maintenance Plan (SWQMP) would be required to identify and implement the required structural Best Management Practices (BMPs) and LIDs for storm water pollutant control. Implementation of the design measures included in the project-specific SWQMP would ensure that runoff volumes and rates are maintained. Future

projects also would conform to the City's Stormwater Management and Discharge Control regulations (San Diego Municipal Code [SDMC] Section 43.0301, et seq.) of the LDC which requires that the existing flows of a property proposed for development, be maintained to ensure that the existing structures and systems handling the flows are sufficient. Adherence to the Municipal Storm Water Permit likewise requires implementation of BMPs during construction of future projects. The requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which include installation of LID practices such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would maintain or improve surface runoff.

In addition to regulatory compliance, consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure HYD/WQ-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure HYD/WQ-1 would require future projects to be 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. Adherence to storm water regulations and implementation of mitigation measure HYD/WQ-1 would ensure that impacts associated with runoff and pollutant discharge would be reduced to less than significant levels.

Drainage and Flooding

There are no FEMA flood zones within or in proximity of the project site; however, future development within the project site could result in alterations to natural drainage flows and velocities causing downstream flooding. The OMCP requires future projects to consider hydromodification standards and prepare project specific drainage studies to address and ensure there would be no disruption to detrimental change to natural water flows. Future implementation of mitigation measure HYD/WQ-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII), would also serve to ensure that impacts related to drainage would be reduced to less than significant levels.

Water Quality

Future development of the site could result in increases in pollutant discharges including downstream sedimentation. Specifically, as described in the OMCP FEIR, industrial operations are known to be a source of heavy metals, oily wastes, and various other substances dependent on the specific industrial operation. Based on Standard Industrial Code and storm water exposure, industrial facilities would be subject to the General Industrial Storm Water Permit and are required to prepare a stormwater pollution prevention plan (SWPPP). Additionally, consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure HYD/WQ-2, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure HYD/WQ-2 would require stormwater improvements and water quality protection measures to prevent erosion, siltation, and transport of urban pollutants impacting surface or groundwater resources. Specifically, all future development would be required to adhere to the City's Storm Water Runoff and Drainage regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agency (e.g., RWQCB) regulations. Additionally, to prevent erosion, siltation, and transport of urban pollutants, mitigation measure HYD/WQ-2 requires all future projects to be designed to incorporate any applicable storm water

improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual, RWQCB and SDMC compliance. Adherence to local and regional regulations and implementation of mitigation measure HYD/WQ-2 would ensure that impacts associated with water quality would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Geology/Soils

OMCP FEIR

Section 5.8 of the OMCP FEIR provides an analysis of geology and soils impacts associated with the CPU. The Program EIR determined that the CPU 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 CPU 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 CPU area to moderate to severe ground shaking, resulting in a potentially significant impact. Regarding compressible soils, the OMCP FEIR determined that portions of the CPU area are underlain by undocumented fill, colluvium/topsoil, and alluvium, which are typically loose, dry and contain rubble and are considered compressible. For future projects underlain by compressible soils, removal and replacement by compacted fill would be required. In regard to expansive soils, the OMCP FEIR determined that the CPU area contains clay mudstone strata within the Very Old Paralac Deposits that exhibit a high to very high expansion potential, which occur over the majority of the CPU 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 CPU area. The OMCP FEIR mitigation framework included mitigation measure GEO-1, which requires preparation of a site-specific geotechnical report recommending project-specific engineering design measures which would reduce potential geologic hazard impacts to a less than significant level.

The OMCP FEIR 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 CPU area, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys. The OMCP FEIR mitigation framework included mitigation measure GEO-2, which 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 this measure would reduce impacts associated with erosion to a less than significant level.

Project

Geologic Hazards

The project site is in a nominal to low geotechnical and relative risk area and is outside of the La Nacion Fault. The project is a GPA, CPA, and Rezone and no development is proposed as part of the

project. Therefore, impacts to geology and soils would not occur as a result of this project; however, future development of the site, could result in geological hazards related to unstable soil conditions, landslides, seismicity (faults), and expansive soils. To ensure the structural integrity of all future buildings and structures, future development would be required to conform all SDMC regulations including preparation of a site- specific soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Future development would also include all seismic protection requirements contained within the California Building Code. Additionally, consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure GEO-1, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure GEO-1 would require adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Compliance with the applicable California Building Code and the SDMC regulations and implementation of mitigation measure GEO-1 would reduce impacts related to geologic hazards to a level less than significant.

Erosion

Future development of the project site could result in exposure of soils (during construction) and soil erosion leading to downstream sedimentation which could impact nearby drainages and stream valleys. Consistent with the OMCP FEIR mitigation framework, the project includes mitigation measure GEO-2 as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure GEO-2 would require adherence to the City's grading regulations and National Pollutant Discharge Elimination System permit requirements. Additionally, this mitigation measure requires future projects to prepare a site-specific Geotechnical Investigation in accordance with the SDMC that includes design specifications based on future project-level grading. Future site plans shall incorporate design measures to minimize potential geologic hazards and seismic conditions identified in the Geotechnical Investigation. Conformance to mandated City grading requirements, and the implementation of mitigation measure GEO-2 would ensure that impacts associated with soil erosion would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Energy Conservation

OMCP FEIR

Section 5.9 of the OMCP FEIR provides an analysis of energy conservation impacts associated with the CPU. The OMCP FEIR concluded that impacts associated with energy conservation would be less than significant, as implementation of the CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the CPU. In addition, the OMCP FEIR concluded that implementation of the CPU would not be anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of the CPU, state and local mandates

for energy conservation, and the energy reduction measures set forth in the CPU policies. Impacts associated with energy use would be less than significant.

Project

No construction is proposed as part of this GPA/CPA and Rezone project. Energy use during construction would occur within two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Future construction would adhere to Policy 4.9-2 of the OMCP Urban Design Element which encourages new development to incorporate environmentally conscious building practices and materials and use recycled and reused construction materials. Additionally, in compliance with the City's Construction and Demolition Debris Deposit Ordinance, future development would be required to develop waste management plans targeting at least 65 percent waste reduction. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical equipment fuel consumption rates. Therefore, project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Future development of the project site would be required to meet the mandatory energy standards of the current California Energy Code as well as 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. Additionally, the project would be required to comply with SDMC regulations requiring project consistency with the City's Climate Action Plan (CAP). Through regulatory measures, future development would not result in excessive energy use during the construction or operation and impacts would be less than significant.

Based on the foregoing analysis, there is no evidence the project would result in a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the OMCP FEIR. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect to energy.

Noise

OMCP FEIR

Section 5.10 of the OMCP FEIR provides an analysis of noise impacts associated with the CPU. The OMCP FEIR 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 NE-3 of the General Plan. Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate 805, State Route (SR-) 905, SR-125, Otay Mesa Road, and Airway Road. The OMCP FEIR mitigation framework included mitigation measures 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, the OMCP FEIR determined that traffic noise resulting from implementation of the CPU would not be compatible with the General Plan standards.

The OMCP FEIR determined that impacts associated with stationary source noise would be significant, as the CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The OMCP FEIR mitigation framework included mitigation measure NOI-3, which requires preparation and submittal of a site-specific acoustical/noise analysis to recommend site-specific noise attenuation measures; however, even with implementation of this measure, the OMCP FEIR determined that impacts would remain significant and unavoidable at the program level.

The OMCP FEIR determined that impacts associated with airport noise would be less than significant, as existing uses within the 60 and 65 community noise equivalent level (CNEL) noise contours from Brown Field would be considered conditionally compatible with these noise levels from operations as Brown Field and General Abelardo L. Rodríguez International Airport in Tijuana, Mexico.

The OMCP FEIR determined that impacts associated with construction noise would be potentially significant, as construction activities related to implementation of the CPU 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 CPU area could result in short-term, temporary noise impacts affecting coastal California gnatcatchers, raptors, and other sensitive species within the MHPA. In order to reduce potentially significant impacts associated with construction noise, the OMCP FEIR mitigation framework included mitigation measures 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

Traffic Generated Noise

The project is a GPA/CPA and Rezone and no development is proposed as part of the project. Therefore, impacts associated with traffic related noise would not occur because of this project. However, future development, could result in an increase in the existing ambient noise levels due to increased vehicular traffic. Consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measures NOI-1 and NOI-2, as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure NOI-1 would require the preparation of a site-specific exterior noise analyses which identifies noise reduction measures, as necessary, to achieve noise compatibility standards. Implementation of mitigation measure NOI-2 would require preparation of a site-specific interior noise analyses is required to demonstrate compliance with the interior noise compatibility standards of the City's General Plan.

Even with implementation of these measures, the OMCP FEIR determined that traffic generated noise impacts would remain significant and unavoidable at the program level. Although these mitigation measures would be implemented at a project-level to traffic noise levels, impacts could remain significant and unavoidable, consistent with the OMCP FEIR.

Stationary Source Noise (Collocation)

The project is a GPA/CPA and Rezone and no development is proposed as part of the project. Therefore, impacts associated with increased stationary source noise levels would not occur as a result of this project. Existing uses in the vicinity of the project site are light to heavy commercial and light to heavy industrial uses. The nearest residential use is approximately 0.1 mile to the north and is separated from the site by intervening topography. The parcel immediately adjacent to the project site to the north is currently vacant but has the potential for sensitive receptors to occur if the site were to develop with residential land use consistent with the underlying zone. Therefore, future development of the project site could result in exposure of people to noise levels which exceed City standards due to collocation of industrial and residential uses (if the site to the north develops with residential). Future development would be required to ensure compliance with City noise policies and regulations as contained in the General Plan and Noise Abatement and Control Ordinance, including those that require noise studies for land uses proposed for potentially incompatible locations, limits on hours of operation for various noise generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. Additionally, the OMCP includes policies to reduce noise impacts. Such policies include requiring site design considerations and other measures to reduce noise levels from these noise generating uses where an interface with noise sensitive land uses occurs. Buildings and walls could be designed to provide noise attenuation to increase compatibility between uses.

The Noise Element of the General Plan and OMCP anticipated noise sensitive land uses, such as residential, would be located in proximity to noise generating land uses, such as industrial land uses. Although no development is proposed at this time, should a future industrial use be proposed on the project site, it would be subject to the Noise Element of the General Plan which includes specific policies pertaining to compatible land uses. Additionally, future development would be subject to OMCP Noise Element policies for noise attenuation pertaining to new uses that would help protect people living and working in the OMCP area, especially within areas of residential-industrial interface. The residential-industrial interface would allow for the collocation of noise sensitive uses (i.e., residential) adjacent to noise generating commercial and industrial uses providing adherence to the following policies:

- **NE-A.1:** Separate excessive noise-generating uses from residential and other noise sensitive land uses with a sufficient spatial buffer of less sensitive uses.
- **NE-A.2:** Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
- **NE-A.5:** Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.
- **NE-B.1:** Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.

In addition to regulatory and policy conformance, consistent with the OMCP FEIR mitigation framework, future development of the site would be subject to the OMCP FEIR mitigation framework

including mitigation measure NOI-3 as detailed in the OMCP MMRP, which is incorporated herein by reference (see Section VIII), which requires site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks. The required noise analysis shall identify all noise-generating equipment, predict noise levels at property lines from all identified equipment, and recommend mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Noise reduction measures include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Exact noise mitigation measures and their effectiveness would be determined by the site-specific noise analysis. The preparation and submittal of a site-specific acoustical/noise analysis, along with regulatory compliance as noted above would ensure that impacts related to the future generation of noise levels in excess of standards established in the City's Municipal Code are minimized. However, even with implementation of these policies and measures, the OMCP FEIR determined that stationary source noise impacts would remain significant and unavoidable at the program level. Although these mitigation measures would be implemented at a project-level to reduce on-site stationary source noise levels, impacts could remain significant and unavoidable, consistent with the OMCP FEIR.

Airport Noise

The project site is located within the inner approach/departure zone (Safety Zone 2) of Brown Field Municipal Airport and is within the Airport Influence Area, which permits office, commercial, service, transportation, communication, utilities, industrial, manufacturing, and warehouse land uses. Based on the Brown Field Noise Compatibility Criteria (see OMCP FEIR Table 5.1-3), these type of land uses are compatible with exterior noise levels up to 75 CNEL and conditionally compatible depending on land use so long as interior noise levels can be attenuated to 50 CNEL. Airport noise contours were created for the OMCP FEIR. As shown in Figure 5.10-2 of the OMCP FEIR, the project site is located within the 65-70 dBA CNEL noise contour. The Brown Field noise contour, shown on Figure 6, Brown Field Safety Compatibility Map, also shows the site is within a 65 to 70 decibel airport noise contour. Therefore, future development of industrial uses within the project site would be compatible with operations at Brown Field and impacts associated with airport noise 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 OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Paleontological Resources

OMCP FEIR

Section 5.11 of the OMCP FEIR provides an analysis of paleontological resource impacts associated with the CPU, which concludes that impacts to paleontological resources would be potentially significant, as approximately 352 acres designated as high paleontological sensitivity, approximately 1,505 acres designated as moderate sensitivity, and less than 1 acre designated as low sensitivity would potentially be impacted by buildout of the CPU. As such, CPU implementation would result in grading that would impact paleontological resources. Future development subject to discretionary

review would require project-level analysis and construction monitoring. Implementation of this measure would reduce impacts to paleontological resources to a less than significant level.

Project

The project site is located within the Otay Formation and is assigned with a high paleontological resources sensitivity, because of its potential for impacts to significant fossils. The project is a GPA/CPA and Rezone project and no development or construction activities are proposed as part of the project. Therefore, impacts to paleontological resources would not occur as a result of this project; however, future ground disturbing activities within the site could result in impacts to paleontological resources. Consistent with the OMCP FEIR mitigation framework, future development would be required to implement mitigation measure PALEO-1 Paleontological Monitoring, as detailed in the OMCP MMRP. Implementation of mitigation measure PALEO-1 would require the City to complete a project-level analysis to determine if monitoring for paleontological resources during excavation activities would be required on the project. Implementation of mitigation measure PALEO-1 would ensure that potential impacts to paleontological resources would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Transportation/Circulation

OMCP FEIR

Section 5.12 of the OMCP FEIR provides an analysis of transportation/circulation impacts associated with the CPU. The OMCP FEIR determined that level of service impacts associated with capacity of the circulation system would be significant. Specifically, a total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at an 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 CPU condition, resulting in significant intersection impacts, and 39 intersections would remain significant after mitigation. The OMCP FEIR determined that all Interstate 805 freeway segments studied would be expected to operate at an acceptable level of service in the Horizon Year Plus CPU condition, while five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition, resulting in a significant impact at these five SR-905 freeway segments. In regard to metered freeway ramp locations, the OMCP FEIR 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 OMCP FEIR mitigation framework stated that at the program level, impacts would be reduced through the CPU 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 OMCP FEIR identified significant impacts at roadway segments throughout the CPU area, including Exposition Way/Vista Santo Domingo between Avenida de las Vistas and Corporate Center Drive, which is expected to operate at LOS F. Even with incorporation of the recommended street classifications identified in Table 5.12-4 of the OMCP FEIR, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition, resulting in significant and unmitigated impacts to roadway segments. The OMCP FEIR 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 OMCP FEIR identified significant impacts at 49 intersections throughout the CPU area. Of these intersections, the following are within the vicinity of the Exposition Way project: Otay Mesa Road/Corporate Center Drive; Otay Mesa Road/Innovative Drive; Heritage Road/Otay Valley Road. The OMCP FEIR mitigation framework included mitigation measure TRF-1, which requires intersection improvements per the lane designations identified in the OMCP FEIR Figures 5.12-4a through 5.12-4g. However, the OMCP FEIR concludes that even with the lane configurations proposed for the intersections analyzed, intersection operations would continue to be significant and unmitigated.

The OMCP FEIR 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 California Department of Transportation, mitigation to these segments cannot be guaranteed by the City. 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.

Project

The project is a GPA/CPA and Rezone action and no development is proposed as part of the project. Therefore, impacts associated with transportation and circulation would not occur as a result of this action; however, any future project development within the project site could result in transportation impacts. Although a development project is not proposed as part of the proposed actions, for disclosure purposes the analysis references potential construction of up to a maximum 43,560-square-foot building, which is the maximum potential building size based on the parcel size of 87,120 square feet and a floor area ratio of 0.5. Additionally, the analysis assumes any future development would be subject to the CPIOZ Type A supplemental regulations, detailed in Section I, which would limit projects to those that would generate no more than 1,000 ADT. Any proposed use

that would generate 1,000 ADT or more would be subject to a subsequent environmental review, consistent with the CPIOZ Type B.

Additionally, through implementation of the CPIOZ Type A, transportation-related impacts would be consistent with what was evaluated in the OMCP FEIR as future development would be required to submit evidence that a project would generate less than 1,000 ADT in order to qualify for a ministerial review. Any development that would generate 1,000 ADT or more would be subject to a Process 3 CPIOZ Type B discretionary permit which would ensure future project-specific environmental review and evaluation of potential transportation impacts.

Additionally, the project would not affect the ability of the OMCP mobility network to be constructed as planned. As future development is proposed, a site-specific evaluation of transportation impacts would be conducted to address consistency with the surrounding mobility network, City mobility policies, and to evaluate traffic operations in the vicinity. Based on a future site-specific transportation analysis for this site, improvements to ensure network functionality could be required. Implementation of the proposed GPA/CPA and Rezone would not affect the feasibility of ultimately connecting Exposition Way with Santo Domingo Road, as identified in the OMCP.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Public Services and Recreation

OMCP FEIR

Section 5.13 of the OMCP FEIR provides an analysis of public service impacts associated with the CPU. The OMCP FEIR stated that buildout of the CPU would increase demand for fire protection services and would contribute to the need for new or altered facilities. The CPU 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 CPU area. The construction of new facilities would take place within the development footprint of the CPU 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 OMCP FEIR, impacts related to the construction of fire protection facilities were determined to be less than significant.

The OMCP FEIR stated that buildout of the CPU would result in additional demand for police service in Beat 713. As discussed in the OMCP FEIR, 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 CPU and the increase of traffic generated by new growth, requiring construction of new facilities. The OMCP FEIR stated that construction of new facilities would take place within the development footprint of the CPU 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 FEIR stated that buildout of the proposed CPU would place additional demands on school services and additional facilities would be required to meet the needs of the CPU buildout. As discussed in the OMCP FEIR, the construction of these facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. The OMCP FEIR determined that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with CPU would mitigate the impact because of the provision that the statutory fees constitute full and complete mitigation. Impacts were determined to be less than significant.

The OMCP FEIR identified that new parks would be required in the CPU area in order to meet the increased demand associated with buildout of the proposed CPU. Under the CPU, 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 CPU; and the OMCP FEIR 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 CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program level of analysis, the OMCP FEIR determined that impacts related to the construction of new park and recreation facilities within the CPU area would be less than significant.

The OMCP FEIR stated that there would be a need for an additional library facility to serve the CPU area upon buildout. The OMCP FEIR stated that the construction of a new facility was specifically contemplated by the current PFFP for the CPU, 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 CPU and would be subject to separate environmental review at the time design plans are available. Therefore, the OMCP FEIR determined that at the program level of analysis, impacts related to the need for construction of a new library within the CPU area would be less than significant.

Project

The project is a GPA/CPA and Rezone project and no development is proposed as part of the project. Therefore, impacts associated with public services and recreation would not occur as a result of this project; however, future development within the project site could increase demands on public services and recreation.

Although no specific development plan is known at this time, the proposed changes in land use designation and zoning would allow light industrial uses within the project site. Development of a light industrial land use would not affect schools, parks, libraries, or recreational facilities; however, the construction of up to 43,560 square feet of new industrial uses could increase the need for police and fire protection services. Future development would be required to adhere to General Plan and OMCP policies that require development to ensure adequate facilities are available at the time of development to serve the project. Additionally, Development Impact Fees (DIFs) would be required to be paid prior to building permit issuance for use to maintain, as well as fund, future facilities. Therefore, through compliance with City policies and payment to the DIF, impacts associated with police and fire protection services would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Public Utilities

OMCP FEIR

Section 5.14 of the OMCP FEIR provides an analysis of utility system impacts associated with the CPU.

The OMCP FEIR concluded that impacts associated with water and reclaimed water utility systems would be less than significant. 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 CPU was implemented. As it pertains to wastewater utility systems, the OMCP FEIR determined that impacts 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 CPU would occur within existing utility line easements and facilities and would not result in significant impacts to the environment.

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 CPU. All such facilities would be constructed in conjunction with future development projects implemented in accordance with the CPU, designed to the satisfaction of the City Engineer. At the project-level, adherence to existing storm water regulations, conformance with General Plan and CPU 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.

With respect to solid waste, the OMCP FEIR concluded that buildout under the CPU would significantly impact landfill capacity. Future development would be required to submit a Waste Management Plan (WMP) ensuring project-specific conformance to solid waste reduction measures and compliance with recycling programs. Implementation of this measure would reduce impacts to public facilities to a less than significant level.

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 CPU area. In addition, the OMCP FEIR determined that short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the CPU would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way.

Project

The project is a GPA/CPA and Rezone and no development is proposed as part of the project. Therefore, impacts associated with public utilities would not occur as a result of this project; however, any future project development within the project site could increase demands on existing public utilities requiring new or expanded facilities which could result in a significant impact.

Water/Sewer/Reclaimed Water

No development is proposed at this time. However, at the time future development is proposed, the site would be serviced by the City's PUD and the OWD. The Otay Mesa service area was evaluated in the Otay Mesa Master Plan Optimization Baseline Report which was relied upon in the OMCP FEIR to address areas of identified utility improvements. No specific improvements were identified for the project site or vicinity (see OMCP FEIR Figures 5.14-1 and 5.14-2). However, as future development is proposed, the availability of services and required improvements would be evaluated. Any improvements required to be constructed to serve development at the site would be evaluated as part of the overall project to ensure physical impacts are addressed. Additionally, future development would be required to adhere to General Plan and OMCP policies requiring the coordination of project-specific improvements. Through regulatory compliance, impacts relating to water, sewer, and reclaimed water facility improvements would be reduced to less than significant levels.

Future development would be required to adhere to General Plan and OMCP policies focused on the assurance that adequate facilities are available at the time of development to serve the project. Therefore, through compliance with City policies, impacts associated with water, reclaimed water, and sewer facilities would be reduced to less than significant levels.

Solid Waste

The OMCP FEIR found that buildout under the plan would not require the construction of a new solid waste facility (City of San Diego 2014). However, future development would be required to comply with City ordinances focused on waste reduction, recycling, and storage. Additionally, future development would be required to adhere to General Plan and OMCP policies relating to waste recycling and diversion of materials. Specifically, the OMCP includes Public Facilities, Services and Safety Element Policies 6.5-1 through 6.5-5, which promote the planning for sufficient waste handling and disposal capacity to meet future needs, encourage future projects to divert construction and demolition debris beyond the 50 percent required by the City's C&D Ordinance, and require sufficient storage space for recycling containers in all new residential, commercial, and industrial development.

In addition to regulatory compliance, consistent with the OMCP FEIR mitigation framework, the project includes mitigation measure UTLI-1, as detailed in the OMCP MMRP which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure UTIL-1 would require discretionary projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste to prepare a Waste Management Plan (WMP). The WMP would be implemented by the applicant and address the demolition, construction, and occupancy phases of the project. Furthermore, since adoption of the OMCP FEIR, additional state mandates have been

implemented to require additional diversion of organic waste. As part of the WMP, future development would be required to demonstrate consistency with current solid waste regulations. Implementation of mitigation measure UTIL-1 would ensure that impacts to waste management would be reduced to less than significant levels.

Stormwater Facilities

At the time a future development is proposed, the need for stormwater facilities would be evaluated as part of the project drainage and water quality analysis. All improvements would be included as part of the overall impact analysis and the relevant OMCP FEIR mitigation measures would apply to minimize adverse physical impacts associated with construction of stormwater facilities. Like the OMCP FEIR, physical impacts associated with construction of storm water infrastructure would be less than significant based on required review of necessary facilities by the City Engineer, adherence to existing storm water regulations, conformance with General Plan and OMCP policies, and required review under CEQA.

Communication Systems

Similar to the conclusions made in the OMCP FEIR, there would be no significant impacts related to provision of cable and telephone services, as these are available through private utility companies that have the capacity to serve the OMCP area and any required utility extensions would be evaluated under CEQA. In addition, the City administers an undergrounding program and 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 right-of-way.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Water Supply

OMCP FEIR

Section 5.15 of the OMCP FEIR provides an analysis of water supply impacts associated with the CPU. The OMCP FEIR determined that impacts associated with water supply would be less than significant. The Water Supply Assessment (WSA) prepared for the OMCP FEIR concluded that there is sufficient water supply to serve existing demands, project demands of the CPU, and future water demands within the City PUD and OWD service area in normal and dry year forecasts during a 20-year projection.

The OMCP FEIR concluded that impacts associated with landscape plans would be less than significant, as all future development must conform to existing regulations, as well as the General Plan and CPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance.

Project

The project is a GPA/CPA and Rezone and no development is proposed as part of the project. Therefore, impacts associated with water supply would not occur as a result of this action; however, any future project development within the project site could increase demands on water supply resulting in the use of excessive amounts of potable water, or use of excessive water use for irrigation.

The OMCP FEIR found adequate water supply to support buildout under the plan. The project would change the project site's land use designation from commercial to light industrial. The specific water demands for the site cannot be known without a specific development project; however, industrial use generally results in a lower demand on water supply as shown in OMCP FEIR Table 5.15-8 which was part of the OMCP CPU water demand analysis. Based on a review of generation rates included in the analysis commercial use would generate a unit rate of 1,785 gallons per day (gpd) per acre while industrial use would generate a unit rate of 893 gpd/acre. Therefore, impacts associated with the potable water supply of a future industrial development would be less than significant.

With respect to irrigation of future landscaping, future development would be required to adhere to existing regulations to assure that acceptable plants are selected for landscaping. Additionally, all landscaping and irrigation would be required to comply with the Landscape Standards in the City's LDC, including a maximum applied water allowance. Through adherence to the LDC, and landscape design policies in the General Plan and OMCP, impacts associated with the use of water for irrigation purposes 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 OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Population and Housing

OMCP FEIR

Section 5.16 of the OMCP FEIR provides an analysis of population and housing impacts associated with the CPU. The OMCP FEIR estimated that population buildout under the CPU would increase to approximately 67,035 people by 2050. The OMCP FEIR determined that impacts associated with population growth would be less than significant, as the CPU would implement the San Diego Association of Government's (SANDAG) Regional Comprehensive Plan (RCP) 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 RCP and General Plan goals and policies. The CPU 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.

The OMCP FEIR determined that impacts associated with affordable housing would be less than significant, as the land use designations and design guidelines contained in the CPU are intended to

foster the development of housing for all income levels. As such, the CPU 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

The project proposes GPA and CPA to redesignate the land use from Community Commercial to Light Industrial and a Rezone from the Commercial Neighborhood (CN-1-2) zone to the Light Industrial (IL-2-1) zone. The project would increase the opportunity for industrial development and would not result in increased density or establish residential development. No impact associated with population and housing would occur.

Based on the foregoing analysis, there is no evidence the project would result in a new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the OMCP FEIR. In addition, there are no changes in circumstances under which the project is undertaken, or new information of substantial importance with respect population and housing.

Agricultural and Mineral Resources

OMCP FEIR

Section 5.17 of the OMCP FEIR provides an analysis of agricultural and mineral resource impacts associated with the CPU. The OMCP FEIR determined that impacts associated with the conversion of agricultural land would be less than significant. It was determined that although the CPU 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 CPU 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 CPU area is intended as an interim, rather than permanent, use. The CPU 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 OMCP FEIR 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.

The OMCP FEIR determined that impacts to mineral resources would be less than significant, as portions of the CPU area where Mineral Resource Zone (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. MRZ-3 mineral resources are not considered a significant mineral resource. As such, the ability to extract mineral resources would not be impacted with the adoption of the CPU.

Project

Agricultural Resources

As shown on Figure 5.17-1 of the OMCP FEIR, the project site is located on land that is designated as Grazing Land as defined by the California Department of Conservation. The project site, however, is not currently in active agricultural use, is fragmented and surrounded by other existing and planned urban land uses and/or land conserved for biological resource protection. Additionally, the project site is not zoned for agricultural use or affected by a Williamson Act Contract. No impacts associated with agricultural resources would occur as a result of future development of the project site.

Mineral Resources

As shown in Figure 5.17-3 of the OMCP FEIR, the project site is situated within a portion of the OMCP area classified as MRZ-3. A MRZ-3 is defined as one that has been found to contain minerals that are not considered significant mineral resources. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the region. No impacts associated with mineral resources would occur as a result of future development of the project site. Impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Greenhouse Gas Emissions

OMCP FEIR

The OMCP FEIR determined that impacts associated with GHG emissions and consistency with adopted plans, policies, and regulations would be significant and unmitigated at the program level if future projects could potentially not meet the necessary reduction goals even with implementation of mitigation framework GHG-1. The CPU 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 CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

The OMCP FEIR identified mitigation framework mitigation measure GHG-2 requiring 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 business as usual would fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to business as usual. While the Mobility, Urban Design, and Conservation elements of the CPU 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 CPU's projected emissions would fall short of meeting the 28.3 percent reduction goal.

Project

The project is a GPA, CPA and Rezone and no development is proposed as part of the project. Therefore, GHG emissions would not occur as a result of this project; however, future development would result in the emission of GHGs. Overall, future development of the site with industrial land uses is anticipated to have similar GHG emissions as development of the site with commercial uses because the CPIOZ Type A would continue to apply which limits ministerial development approvals to those land uses that would generate less than 1,000 ADT. As vehicular emissions are typically a primary generator of GHG emissions, the CPIOZ Type A would limit GHG emissions. Any project that would generate 1,000 ADT or more would be subject to a Process 3 CPIOZ Type B discretionary review which would require site-specific evaluation of GHG emissions and implementation of the OMCP FEIR mitigation framework including mitigation measures GHG-1 and GHG-2, as detailed in the OMCP MMRP which is incorporated herein by reference (see Section VIII). Implementation of mitigation measure GHG-1 would require future projects to demonstrate avoidance of significant GHG emissions through adherence with policies contained within the OMCP Mobility, Urban Design, and Conservation Elements. These policies require efficient energy and water conservation designs, increase urban forestry practices, decreased urban heat islands, and increase climate sensitive designs. Additionally, mitigation measure GHG-1 and GHG-2 would be implemented through future project review consistent with the City's adopted CEQA thresholds for GHG and SDMC regulations. On August 2, 2022, the San Diego City Council approved the Climate Action Plan Update Package Municipal Code, Land Development Manual, and Local Coastal Program Amendments (CAP consistency regulations). All future development would be required to demonstrate consistency with these requirements.

Implementation of the OMCP mitigation measures related to GHG, in addition to application of the City's CAP consistency regulations, would ensure that the project would not result in new or more severe GHG emissions. However, consistent with the OMCP FEIR, cumulative GHG emissions are considered significant and unavoidable, consistent with the findings of the OMCP FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

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 OMCP FEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

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. There is no new information available that would indicate that the project would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The OMCP FEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the OMCP FEIR were implemented: land use; biological resources; historical resources; human health/public safety/hazardous materials; hydrology/water quality; geology/soils; and paleontological resources. The OMCP FEIR further concluded that significant impacts related to air quality, noise, utilities, and GHG emissions would not be fully mitigated to below a level of significance, and would remain significant and unavoidable. With respect to cumulative impacts, implementation of the OMCP FEIR would result in significant impacts related to air quality, noise, traffic/circulation (horizon year), utilities (solid waste), agricultural resources, and GHG emissions, which would remain significant and unavoidable.

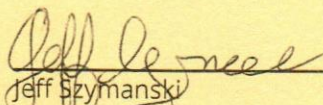
Because there were significant unmitigated impacts associated with the certified OMCP FEIR, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the respective Program EIRs, 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 OMCP FEIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

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

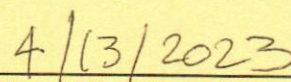
As discussed throughout the Addendum, future development of the project site would be subject to a future site-specific analysis under CEQA to implement the mitigation framework outlined within the MMRP of the previously certified OMCP FEIR. The mitigation measures presented as Chapter 11.0 of the OMCP FEIR are hereby incorporated by reference and shall apply to future development of the project site.

IX. CERTIFICATION

Copies of the addendum, the certified OMCP FEIR, 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>.



Jeff Szymanski
Senior Planner
Development Services Department



Date of Final Report

REFERENCES

San Diego, City of

- 2003 San Diego Municipal Code Land Development Code Land Development Code Trip Generation Manual Revised May.
<https://www.sandiego.gov/sites/default/files/legacy/planning/documents/pdf/trans/tripmanual.pdf>.
- 2014 Otay Mesa Community Plan Update. Revised February.

Figures 1-6



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 Project Location

FIGURE 1
Regional Location



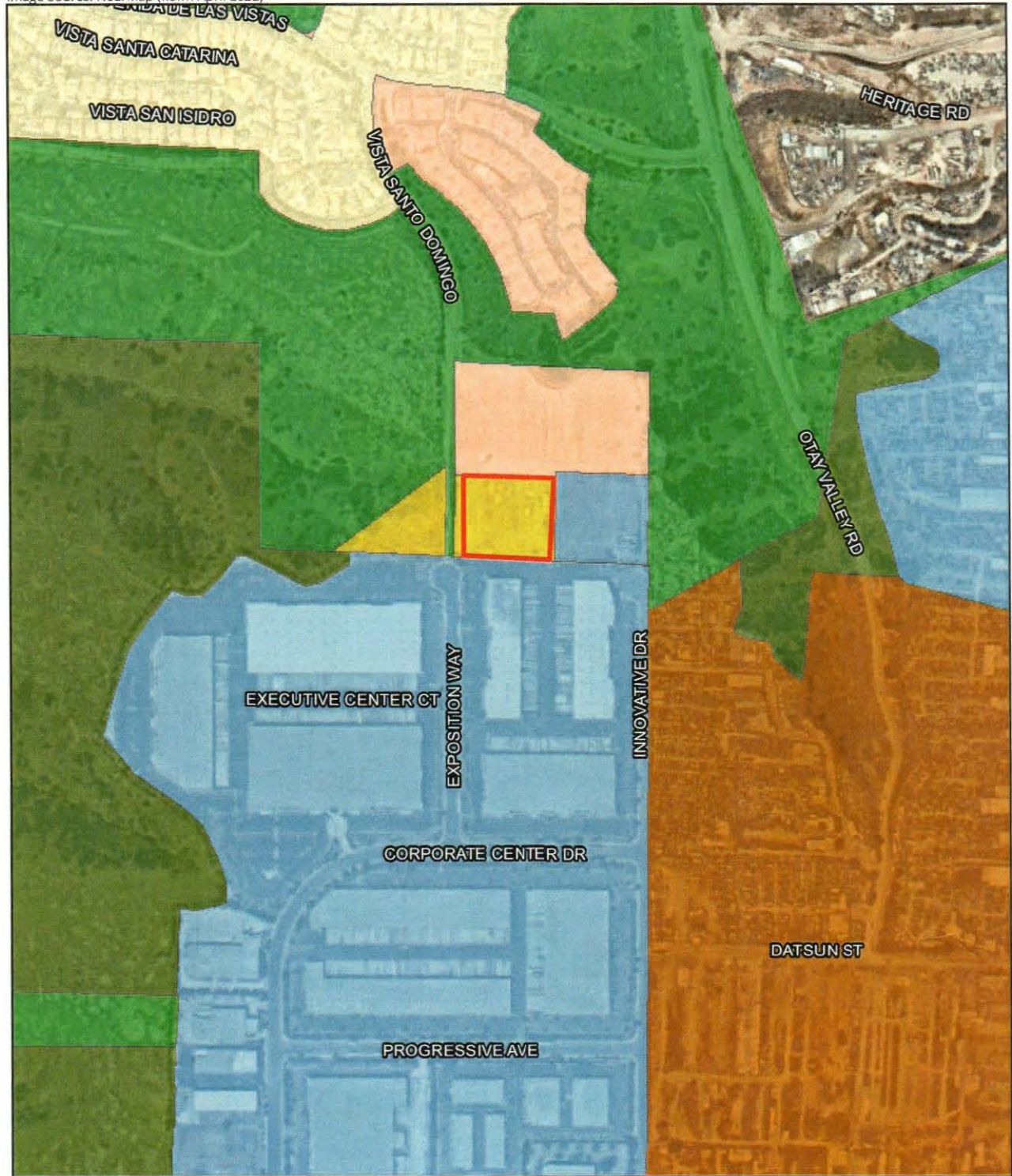
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 Project Boundary

FIGURE 2
Aerial View

Image Source: NearMap (flown April 2022)




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FIGURE 3
Project Site and Surrounding Zoning



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 Project Boundary **Airport Influence Area**

 Review Area 1

 Review Area 2

0 Feet 1,000



FIGURE 4
Brown Field Airport Influence Area



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 Project Boundary

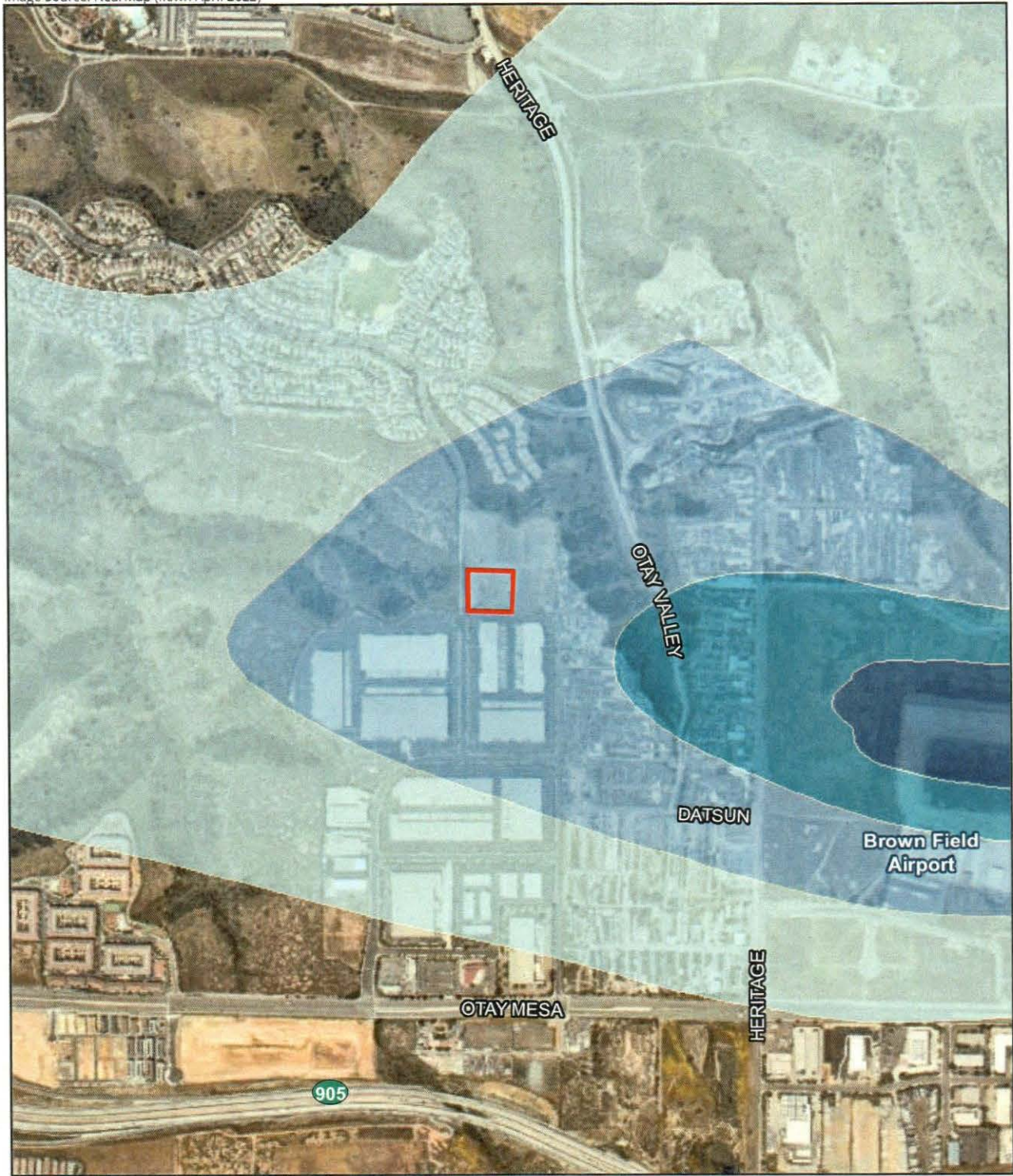
Safety Zones

-  Zone 1 - Runway Protection Zone
-  Zone 2 - Inner Approach/Departure Zone
-  Zone 3 - Inner Turning Zone
-  Zone 6 - Traffic Pattern Zone
-  Outer Safety Zone
-  Sideline Zone; primarily on airport property
-  Airport Influence Area 2

0 Feet 1,000







FIGURE 5
Brown Field Safety Compatibility Map



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 Project Boundary

Noise Contours

-  60 - 65 db CNEL
-  65 - 70 db CNEL
-  70 - 75 db CNEL
-  75+ db CNEL

0 Feet 1,000



FIGURE 6
Brown Field Safety Compatibility Map