ADDENDUM
TO AN
ENVIRONMENTAL IMPACT REPORT

THE CITY OF SAN DIEGO

Project No. 538140
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: **SUNROAD - OTAY 50 PROJECT:** VESTING TENTATIVE MAP (VTM) to consolidate existing parcels, PLANNED DEVELOPMENT PERMIT (PDP) to construct buildings on the aforementioned parcels, SITE DEVELOPMENT PERMIT (SDP) to ensure compliance with regulations related to development on Environmentally Sensitive Lands, COMMUNITY PLAN AMENDMENT (CPA)/GENERAL PLAN AMENDMENT (GPA) to remove Avenida Costa Azul from the Otay Mesa Community Plan Roadway Classification network and the General Plan Land Use and Street System Map, STREET VACATIONS to vacate unimproved public right of way, EASEMENT ABANDONMENTS to abandon unused drainage and floodwater storage easements, and STREET DEDICATIONS to create a new public right-of-way and widen Otay Mesa Road, all consistent with the Otay Mesa Community Plan Update. The site is within the Otay Mesa Community Plan Area/Community Plan Implementation Type "A" Overlay Zone; Airport Compatibility Overlay Zone (Brown Field)/Airport Influence Review Area 1/FAA Part 77 Noticing Area/Safety Zone 2; and Very High Fire Hazard Severity Zone. [LEGAL DESCRIPTION: Parcels 1 through 7 of Parcel Map No. 18959, together with Lots 4 and 8 of Map No. 14023, together with parcels 1 and 2 of Parcel Map No. 18483.] The site is not included on any Government Code listing of hazardous waste sites. Applicant: Sunroad Otay Partners, L.P.

I. PROJECT DESCRIPTION

The Sunroad – Otay 50 project site is located in the Otay Mesa community of the City of San Diego. The approximately 49.1-acre project site is north of SR-905, south of Otay Mesa Road, east of La Media Road, and west of SR-125 (see Figure 1, *Location Map*). The project site is currently undeveloped and is characterized with flat topography. Surrounding land uses include a mix of industrial uses to the north, west, and south; the SR-125/SR-905 interchange is located to the southeast (see Figure 2, *Aerial Photograph*). The project would be developed in accordance with the Community Plan land use designation (Heavy Commercial) and current zoning (IL-3-1). The project site is within the Otay Mesa Airport District of the Otay Mesa Community Plan and designated Heavy Commercial in the Community Plan. This land use designation allows a variety of commercial and industrial uses ranging from retail and commercial services to office and light industrial. The IL-3-1 zone allows for a mix of light industrial, office, and commercial uses.

The proposed Sunroad - Otay 50 project involves resubdividing the 49.1-acre property and future development of approximately 845,226 square feet of warehouse uses in accordance with the Community Plan land use designation and existing zone. Discretionary actions associated with the project are a Vesting Tentative Map (VTM); Planned Development Permit (PDP); Site Development Permit (SDP); Community Plan Amendment (CPA)/General Plan Amendment (GPA); and Street Vacations to vacate public right-of-way for Avenida Costa Azul, St. Andrews Avenue, and Piper Ranch Road. The proposed project also includes Easement Abandonments to abandon various unused drainage and floodwater storage easements and Street Dedications to widen Otay Mesa

Road.

The project involves the construction of four buildings totaling 845,226 square feet of warehouse industrial land use, along with all associated landscaping, grading, drainage, utility, and access improvements. One building would be constructed in each parcel: Parcel 1 would include a 216,320-square-foot building; Parcel 2 would include a 153,676-square-foot building; Parcel 3 would include a 240,560-square-foot building; and Parcel 4 would include a 234,670-square-foot building (see Figure 3, *Site Plan*). Landscaping would include planting of accent trees in outdoor employee break areas, shade trees in parking areas, and screening shrubs such as bougainvillea and Cleveland sage. Low/accent shrubs, such as red yucca and dwarf myrtle, and groundcover plants, such as bank catclaw and trailing lantana, would be planted along the border of Buildings 1 and 2, as well as Buildings 3 and 4.

The project is planned to be developed in two phases. Phase 1 consists of the construction of two buildings (Building 3 and Building 4) totaling approximately 370,000 square feet east of Piper Ranch Road. As part of Phase 1, access to the site would be established through constructing a driveway forming the south leg of the existing signalized intersection of Otay Mesa Road and Piper Ranch Road. Phase 2 consists of construction of approximately 475,000 square feet (Building 1 and Building 2) west of Piper Ranch Road. As part of Phase 2. A right-in/right-out driveway at the west side of the property along Otay Mesa Road would be constructed to provide a second access point to the site. Phase 1 was previously anticipated to be completed and open to public by the year 2018 and Phase 2 is anticipated to be completed by the year 2020.

Figure 3, *Site Plan*, shows the proposed site plan. Figure 4, *Vesting Tentative Map*, shows the proposed Vesting Tentative Map and lots to be consolidated into four parcels. Figure 5, *Existing Lot Lines and Easements,* shows the existing parcels and lots. A detailed description of the project's various elements and features is provided below.

Proposed Vesting Tentative Map

As shown in Figure 4, the proposed VTM would consolidate the existing 11 parcels into four parcels. Parcel 1 would be 11.412 acres; Parcel 2 would be 8.543 acres; Parcel 3 would be 12.920 acres; and Parcel 4 would be 15.166 acres. The project proposes bioretention areas in the center and western portions of the site, with a detention basin proposed for the southwest portion of the site. Primary access to the project would occur via two driveways from Otay Mesa Road, with the eastern driveway being the south leg of the Otay Mesa Road/Piper Ranch Road intersection. The project would include 143 trailer parking spaces and 894 auto parking spaces, of which 86 would be designated for clean air/vanpool, 30 accessible parking spaces and 51 (26 active) EV parking spaces. A total of 48 long-term bicycle parking spaces would be provided in lockers, where 45 long-term spaces are required.

Proposed Planned Development Permit

The proposed project requires processing of a PDP in order to allow a deviation from the Land Development Code regulations pertaining to street frontage. Section 131.0631, Table 131-06C of the San Diego Municipal Code (SDMC) requires that lots in the IL-3-1 zone provide at least 75 feet of street frontage. Parcel 2 of the VTM will not have frontage on a street and, therefore, a deviation from Section 131.0631 is required.

Proposed Site Development Permit

The project involves an SDP due to Environmentally Sensitive Lands occurring on the project site. The project site supports non-native grassland, disturbed land, and developed land. Non-native grassland is recognized as a sensitive habitat due to its potential to provide foraging habitat for raptors. Proposed development of the project site would result in the loss of all of the on-site resources.

Proposed Community Plan/General Plan Amendment

The project involves a CPA to remove Avenida Costa Azul from the Otay Mesa Community Plan Roadway Classification Network (see Figure 6, *Proposed Community Plan Amendment*) and a GPA to remove it from the General Plan Land Use and Street System Map. The proposed project would provide access via a four-lane private driveway in the location of the Avenida Costa Azul right-of-way designed to accommodate the appropriate number of vehicles accessing both the Sunroad - Otay 50 project site and the adjacent "La Media Retail" project. Additional access would be via a driveway that would be the fourth leg of the currently signalized intersection of Otay Mesa Road and Piper Ranch Road.

Project Access

The project requires the vacation of public street rights-of-way. Specifically, the unimproved public street rights-of-way for Avenida Costa Azul, St. Andrews Avenue and Piper Ranch Road would be vacated. The project proposes new public right-of-way for the widening of Otay Mesa Road to a six-lane primary arterial, which is the current Community Plan classification, as part of the VTM. Figure 7, *Roadway Layout*, shows the widening of Otay Mesa Road. Additionally, drainage and floodwater storage easements that occur on the property would be vacated. (See Figure 7.)

Grading Plan

The proposed development would require grading of the entire site. Earthwork would be balanced on-site, with a total of 125,000 cubic yards of cut and fill. The maximum height of fill slopes would be eight feet; the maximum height of cut slopes would be 11 feet. The project proposes 840 linear feet of retaining/crib walls, ranging in height from less than two feet to a maximum height of 15 feet.

II. ENVIRONMENTAL SETTING

The undeveloped project site is located in the Otay Mesa community of the City of San Diego. Situated south of Otay Mesa Road, east of La Media Road, north of SR-905, and west of SR-125, the project site encompasses 49.1 acres (see Figure 2). The topography of the site is relatively flat with a southwesterly drainage gradient. Elevations vary from approximately 520 feet above mean sea level (AMSL) in the northeastern corner to approximately 483 feet AMSL at the central west property line. Access to the project site is currently available from Otay Mesa Road. Surrounding development includes the planned SR-125/SR-905 interchange to the southeast with various industrial uses including international trade logistics support, warehousing, distribution, auto salvaging, and truck yards for cross-border goods movement to the north, west, and south. Brown Field Municipal Airport is located less than one mile to the west of the project site.

The project site is in the urbanized Airport District and is designated Heavy Commercial in Otay Mesa Community Plan. The project site is zoned IL-3-1. Additionally, the project is located in Community Plan Implementation Overlay Zone (CPIOZ Type A), Airport Influence Area (AIA) Review Area 1 (Brown Field), Airport Compatibility Overlay Zone (Brown Field), Federal Aviation Administration (FAA) Part 77 Noticing Area (Brown Field), and Safety Zone 2 (Brown Field), and Very High Fire Hazard Severity Zone. The project site is located in a developing area currently served by existing public services and utilities.

III. PROJECT BACKGROUND

The project site is located within the Otay Mesa Community and is subject to the Otay Mesa Community Plan Update (CPU). The Otay Mesa CPU was adopted on March 11, 2014. The CPU anticipates buildout of remaining

vacant parcels of commercial acreage within Otay Mesa to service the community. A Program EIR (EIR) was prepared for the Otay Mesa CPU. The Otay Mesa Community CPU EIR was certified and the CPU was approved by the San Diego City Council on March 11, 2014.

The Sunroad – Otay 50 Project Addendum to the Otay Mesa CPU EIR addresses the specific proposal for resubdividing the 49.1-acre property and future development of approximately 845,226 square feet and demonstrates the project's consistency with the CPU and environmental analysis contained in the CPU EIR.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Otay Mesa Community Plan Update Program Environmental Impact Report (EIR) No. 30330/304032/SCH No. 2004651076. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

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

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

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

    a) The project will have one or more significant effects not discussed in the previous environmental document;
    b) Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
    c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

A Program EIR was prepared for the Community Plan Update and certified by the San Diego City Council on March 11, 2014 (CPU EIR). The CPU EIR analyzes the following issue areas:

- Land Use
- Visual Effects and Neighborhood Character
- Air Quality/Odor
- Biological Resources
- Historical Resources
- Human Health/Public Safety/Hazardous Materials
- Hydrology/Water Quality
- Geology/Soils
- Energy Conservation
- Noise
- Paleontological Resources
- Traffic/Circulation
- Public Services
- Utilities
- Water Supply
- Population and Housing
- Agriculture and Mineral Resources
- Greenhouse Gas Emissions

The CPU EIR found that the Community Plan Update would result in significant environmental impacts associated with Land Use, Air Quality, Biological Resources, Historical Resources, Human Health/Public Safety/Hazardous Materials, Hydrology/Water Quality, Geology/Soils, Noise, Paleontological Resources Traffic/Circulation, Utilities, and Greenhouse Gas Emissions. With the exception of impacts related to Air Quality (Criteria Pollutants, Stationary Sources/Collocation), Transportation/Circulation, Noise (Traffic/Stationary Sources and Construction), Utilities (Solid Waste), and Greenhouse Gas Emissions, mitigation measures were proposed that would reduce project impacts to below a level of significance. A Statement of Overriding Considerations was adopted for the project in concert with certifying the CPU EIR for unavoidable impacts relative to Air Quality (Criteria Pollutant, Stationary Sources/Collocation), Transportation/Circulation, Noise (Traffic/Stationary Sources and Construction), Utilities (Solid Waste), and Greenhouse Gas Emissions.

This Addendum supplements information provided in the Otay Mesa Community Plan Update EIR (Project No. 30330/304032 / SCH No. 2004651076) to further describe development on the Sunroad - Otay 50 project and includes the impact analysis necessary to demonstrate impacts associated with the Sunroad – Otay 50 project are consistent with the previously certified Otay Mesa Community Plan Update EIR.

V. IMPACT ANALYSIS

This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the Sunroad – Otay 50 project are consistent with or less than the impacts disclosed in the previously certified Otay Mesa CPU EIR. The following includes the environmental issues analyzed in detail in the Otay Mesa CPU EIR, as well as the project-specific analysis pursuant to CEQA. The analysis in this document evaluates the adequacy of the Otay Mesa CPU EIR relative to the project. The following analysis documents that the proposed modification and/or refinements would not cause new or more severe significant impacts than those identified in the 2014 Otay Mesa CPU EIR.

This Addendum tiers from the Otay Mesa CPU EIR, and as such, threshold questions used throughout this EIR Addendum are based on the threshold questions used in the Otay Mesa CPU EIR rather than the threshold questions included in Appendix G to the CEQA Guidelines or the City's *Significance Determination Thresholds* (January 2016). Notwithstanding, the methodology for determining the significance of the project's impacts under each threshold question varies in some cases from the methodology used for determining the significance of impacts by the Otay Mesa CPU EIR. For example, the methodology for evaluating the significance of project impacts to transportation/traffic relies on the City's *Significance Determination Thresholds* rather than the methodology used in the Otay Mesa CPU EIR. Additionally, the issue area of Greenhouse Gas Emissions is

evaluated separately, which is explained separately under the issue area of Greenhouse Gas Emissions. This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the project are consistent with or less than the impacts identified in the previously certified OMCPU EIR; thus, the same thresholds were utilized for the impact analysis herein, except as explained above for transportation/traffic.

Land Use

CPU EIR

The Otay Mesa CPU EIR found that the goals, policies, and programs of the CPU were consistent with existing applicable local land use plans, policies and regulations. No inconsistencies were identified, and land use impacts were determined to be less than significant.

The CPU land use plan designates two community villages close to transit, employment, and other significant urban uses, which is consistent with the General Plan and the City of Villages strategy. The CPU would concentrate industrial and non-residential uses in the eastern portion of the CPU area to ensure that residential uses are buffered from the existing and potential future industrial uses that have existed and are planned to continue within Otay Mesa. The policies developed for the CPU were drafted in a manner that is consistent with the General Plan, supporting diversity of development within the community, provision of infrastructure concurrent with need, and with an emphasis on the protection of existing natural resources and landforms and sensitive habitat within the CPU area. As such, impacts were determined to be less than significant with adoption of the CPU and associated actions.

Additionally, the CPU was found to be consistent with the adopted ALUCP for Brown Field. Both the General Plan and the Municipal code provide policies for land use compatibility with ALUCPs that would be implemented for future development. The CPU requires all future development proposals to demonstrate consistency with the adopted ALUCP.

The CPU incorporates the multi-modal strategy of both the RCP and RTP through the designation of two high-density mixed-use villages along a South Bay bus rapid transit (BRT) corridor: a Neighborhood Village, located in the western portion of the community; and a Community Village, located in the central portion of the community south of SR-905. Airway Road, which runs east to west through the community, would serve as the principal transportation and activity corridor, functioning as a transit route that lines the villages, employment centers, and Southwest College. Additionally, a north-south BRT route is planned on SR-125 and SR-905 from the Otay Mesa Point of Entry north. In addition, the CPU includes policies related to land use, mobility, and circulation/transportation that promote the RCP's smart growth strategies.

The CPU would place residential and industrial uses in proximity to one another, which would have potential impacts associated with the collocation or interface of incompatible land uses. The CPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses, such as residential and industrial uses. Three locations within the CPU are identified as areas that would include the interface of industrial and residential uses. The first location, a small area of medium density residential (within the Northwest District), would be adjacent to a larger tract of light industrial designated land (within the Airport District). The second interface area within the CPU would occur between the Central District and the South District, where the Central Village Specific Plan Area would be located west of land designated for industrial uses (business park) and separated by Cactus Road. The third area includes development within the Business Park-Residential permitted land use category, which would be placed into a Community Plan Implementation Overlay Zone (CPIOZ)

to ensure appropriate interface treatments in this location. Future development projects would be required to comply with the collocation policies of the General Plan and CPU. Through implementation of the measures identified in Section 5.6 (Human Health/Public Safety/Hazardous Materials) of the CPU EIR, the potential environmental impacts resulting from change in land use designations in accordance with the CPU was found to be less than significant.

The Land Use Section of the Otay Mesa CPU EIR also addresses the City's polices included in the CPU's Conservation Element directed at implementing ESL regulations, the MSCP, and the Biology Guidelines. The development footprint of the CPU encroaches into sensitive ESL areas. Future public and private development proposals would be required to comply with the ESL regulations through a Site Development Permit. Additionally, all subsequent projects in the CPU area would be subject to review in accordance with CEQA, at which time appropriate site-specific mitigation in accordance with the CPU's EIR Mitigation Framework measures BIO-1 through BIO-4 would be identified for impacts to sensitive biological resources covered under ESL. For other resource areas covered under the ESL regulations, such as steep hillsides and floodplains, future projects would be designed to ensure compliance with the supplemental regulations and any other regulatory requirements to ensure that no impacts would occur. Therefore, at the program-level, the EIR determined that the CPU would not be in conflict with the purpose and intent of the ESL regulations and potential impacts would be below a level of significance.

Given the presence of historical resources distributed throughout the CPU area, the EIR found that implementation of the CPU has the potential to result in significant impacts to historical resources. The CPU includes several policies aimed to reduce impacts to historical resources within the CPU area, as well as development regulations required for projects within areas covered by CPIOZ Type A that address archaeological resources. Additionally, incorporation of the CPU EIR's Mitigation Framework for historical resources contained in Section 5.5 (Historical Resources) of the CPU EIR (including Mitigation Measure HIST-1) reduces the potential for significant impacts at the project-level to below a level of significance.

Implementation of the CPU would require compliance with the City's Brush Management Regulations. Compliance with the Brush Management Regulations, or equivalent protection measures, as approved by the Fire Chief, would be accomplished at the project level as part of the development review and permit approval process. No conflict with the Brush Management Regulations, or the equivalent, would occur. Impacts would be less than significant.

Proposed Project

The project site is located in the Otay Mesa Airport District of the Otay Mesa Community of the City of San Diego. According to the CPU, the project site's land use designation is Heavy Commercial. This land use designation allows a variety of commercial and industrial uses ranging from retail and commercial services to office and light industrial (including warehouse uses). The Sunroad – Otay 50 project would be consistent with the CPU and would expand heavy commercial uses in Otay Mesa as envisioned by the CPU. Furthermore, the proposed project would be consistent with the CPU's specific polices and recommendations for the heavy commercial land use designation such as allowing heavy commercial uses near the Port of Entry and along Otay Mesa Road and continuing to allow retail uses within the heavy commercial designated areas that support cross border activity. Existing zoning for the project site is IL-3-1. The IL-3-1 zone allows for a mix of light industrial, office, and commercial uses. The project proposes various warehouse uses. Therefore, implementation of the project would be consistent with the CPU EIR's conclusion that land use impacts would be less than significant with no mitigation required because the project meets the Community Plan's objectives.

The project site is less than one-mile east of the Brown Field Municipal Airport and is located within Review Area 1 of the Brown Field AIA, Safety Zone 2, FAA Part 77 Noticing Area. As discussed in Section 5.1.3.1 of the Otay Mesa CPU EIR, all projects within the CPU area must satisfy all applicable conditions and criteria in the ALUCP for Brown Field prior to the approval of individual development projects for any proposed building or uses within the AIA for Brown Field. Implementation of this policy would ensure that future projects developed in accordance with the CPU – including the proposed Sunroad – Otay 50 project – would be consistent with the adopted ALUCP for Brown Field and related policies and regulations. Although the project site overlaps with the ALUCP compatibility zone area for Brown Field, the proposed project would not include elevated features that could interfere with navigable airspace. Implementation of the proposed project would not result in a safety hazard for people working in the project area. Therefore, no land use inconsistency relative to the ALUCP for Brown Field would result from implementation of the project.

Relative to the CPUs multi-modal policies, the proposed project would not affect the ability for multi-modal strategies of the RCP and RTP to be implemented. The project site is not located within one of the two high-density mixed-use villages and is not along the BRT corridor identified for Airway Road. The project site is currently served by the Metropolitan Transit Service (MTS) Route 905 on weekdays. There is an existing bus stop at the northwest corner of Otay Mesa Road and Piper Ranch Road for Route 905 that could be utilized by future employees of proposed project. Additionally, two new bus stops on Otay Mesa Road would be incorporated into the project site design. Access to the site from these new bus stops serving eastbound bus routes would be provided by a non-contiguous sidewalk connection along the project frontage and on-site connections to the buildings. A pedestrian crossing with pedestrian ramps at the signalized intersection of Otay Mesa Road and Piper Ranch Road is provided for pedestrians to access westbound bus routes. The 2050 Regional Transportation Plan, prepared by the SANDAG, includes the addition of Rapid Bus Service (Route 638) that would connect the San Ysidro Community in the west with the Otay Mesa Community in the east via the planned transit corridor on Airway Road and the SR-905 Corridor as part of the Revenue Constrained Plan estimated to be implemented by Year 2035. This would provide additional bus connections for the proposed project.

Relative to the City's ESL regulations pertaining to biological and historical resources, the proposed project would impact sensitive biological resources and has the potential to affect subsurface historical resources. As discussed under *Biological Resources*, below, and required by the Otay Mesa CPU EIR, the project would implement Mitigation Measures BIO-1 through BIO-4, as well as project-specific mitigation measures in accordance with requirements of the CPU Mitigation Framework, to reduce impacts to below a level of significance. The project would also incorporate Mitigation Measure HIST-1 discussed under *Historical Resources* below and called out in the CPU Mitigation Framework for impacts to Historical Resources through project-specific mitigation measures. See Section VI of this Addendum.

As discussed in the CPU EIR, all future projects implemented in accordance with the CPU are required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations and Landscape Standards pursuant to General Plan and CPU policies intended to reduce the risk of wildfires. The project site borders an urbanized developed area to the north, west, and south. The project site's proximity to native vegetation in the open space to the northeast could present wildland fires as a significant threat. The project has been reviewed by the City's Fire Rescue Department and Landscape Planning and has been found consistent with all applicable polices and regulations. Compliance with policies and regulations would reduce the impacts related to exposure of people or structures to a significant risk of loss, injury, or death from wildland fires to less than significant. Impacts would be less than significant. No mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant land use impacts or a substantial increase in the severity of land use impacts from those described in the CPU EIR. Furthermore, the project would be required to implement applicable mitigation measures from the CPU EIR, as well as project-specific mitigation measures developed in-line with the CPU Mitigation Framework, to reduce project impacts to below a level of significance.

Visual Effects and Neighborhood Character

CPU EIR

Impacts relative to Visual Effects and Neighborhood Character are address in Section 5.2 of the CPU EIR. Based on the analysis in the EIR, the CPU has been designed to include designated view corridors and gateways in order to prevent impacts to views of public resources. Also, the CPU includes policies and project design features that are to be implemented at the project level to protect identified view corridors and gateways. The EIR determined that, with the inclusion of specific policies and required project design features, view blockage impacts would be less than significant. While the CPU will result in a change in character for the community – transitioning from areas of undeveloped mesas and non-native grasslands to urban uses – the intensification of uses was not considered a significant change to the visual character.

The land use and development design guidelines and policies included in the CPU are intended to ensure that 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 of the OMCP would be subject to review in accordance with CPIOZ Type A. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B, and that review can ensure that land use and development guidelines are considered and incorporated, as applicable. Therefore, impacts associated with Visual Effects and Neighborhood Character were found to be less than significant.

Proposed Project

As stated above, future development in the CPU – including the Sunroad – Otay 50 – is required to comply with the relevant land use and development design and ESL guidelines and policies of the General Plan and CPU. The project site is currently undeveloped. The proposed project would develop four buildings totaling 845,226 square feet of warehouse uses. The project is consistent with the Community Plan Industrial Design Polices and would use quality exterior materials and trims and finishes that convey a sense of substance and permanence with a subdued color scheme. The project would also incorporate architectural features and treatments to achieve variations in façade elements that reduce the buildings mass and scale. The project site is located in the Airport District, which is already developed with industrial uses. The CPU allows for further intensification and development of these uses within the Airport District. Also, the project is not located in a view corridor. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant landform alteration of visual quality impacts from that described in the CPU EIR.

Air Quality

CPU EIR

Air Quality impacts are evaluated in Section 5.3 of the CPU EIR. The EIR concludes that the changes in the land uses under the CPU and the traffic generated by future development in the CPU would result in fewer emissions than the adopted Community Plan upon which the then-current RAQS was based. Thus, the EIR concluded that the CPU would not obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP, and impacts would be less than significant. Additionally, a general analysis of air emissions conducted as part of the CPU EIR determined that emissions due to construction would not exceed applicable thresholds. However, the EIR states that, if several future projects were to occur simultaneously, there is a potential for the combination of multiple projects to exceed significance thresholds. While it is not anticipated that construction activities under the CPU would result in significant air quality impacts, air emissions from future developments within the CPU area could not be adequately quantified at the time of the CPU; therefore, impacts were concluded to be significant and unmitigated. Similarly, as air emissions from the future developments with respect to operational impacts could not be adequately quantified at the time of the CPU, operational air quality impacts associated with future projects were determined to be significant and unmitigated.

Relative to the potential for harmful concentrations of CO to occur in areas of congested intersections, the EIR concludes that increases of CO due to the CPU would be below Federal and State standards. Therefore, there would be no harmful concentrations of CO; localized air quality emission would not exceed applicable standards and would not result in a significant impact to sensitive receptors.

Based on the analysis and modeled results conducted for the CPU with regard to future health risks associated with toxic air emissions (primarily from traffic-generated diesel exhaust emissions) and buildout of the CPU, the EIR concludes that development of future land uses within the CPU area would not expose future residents or workers to significant cancer risk from traffic generated diesel exhaust emissions.

The CPU concludes that industrial uses could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact. Any new facility proposed that would have the potential to emit toxic air contaminants would be required to evaluate toxic air problems resulting from the facility's emissions. If the facility poses a potentially significant public health risk, the facility would submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Specific project-level design information would be needed to determine stationary source emission impacts. Therefore, at the program-level, impacts would be potentially significant.

The CPU would place residential, commercial, and industrial uses in proximity to one another, which would have potential air quality impacts associated with the collocation of incompatible land uses. The CPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. Future development projects would be required to comply with the collocation policies of the General Plan and CPU, which are necessary to reduce or avoid potential air quality impacts. While compliance with the CPU and General Plan policies, along with local, State, and Federal regulations, would reduce potential impacts, the EIR concludes that future projects may result in sensitive uses (residential uses, schools, and parks) being located in areas where toxic air emissions may occur. Therefore, there would be a potential that sensitive receptors would be exposed to toxic air emissions and impacts were found to be potentially significant. The EIR includes a Mitigation Framework to reduce the potential impacts associated with exposure to air toxics but concludes that it cannot be determined whether the proposed mitigation would reduce all impacts to below a level of significance. Therefore, impacts related to exposure to air toxics would be significant and unavoidable.

Proposed Project

An *Air Quality Study* was prepared by Rincon Consultants, Inc. (April 2017) for the proposed Sunroad – Otay 50 project. A copy of that report can be found in Appendix A to this Addendum.

Regional Air Quality Standards Consistency (RAQS)

The RAQS relies on information from the California Air Resources Board (CARB) and San Diego Association of Governments (SANDAG), including projected growth in the County; and mobile, area, and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the General Plan are consistent with the RAQS. The proposed project is consistent with the CPU, which was found to be consistent with the City's General Plan. Therefore, the project is consistent with the RAQS, and no significant impact would result.

Construction Impacts

Construction would generally consist of site preparation, grading, construction of the proposed buildings, paving, and architectural coatings. Project construction would create temporary air pollutant emissions associated with fugitive dust from soil and exhaust emissions generated by heavy construction vehicles. In addition, reactive organic gases (ROGs) would be released during the drying phase after application of paint and other architectural coatings. The site preparation and grading phases would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dues emissions. On-site grading would be required to comply with San Diego Air Pollution Control District (SDAPCD) Rules 52 and 54 that identify measures to reduce fugitive dust and is required to be implemented at all construction sites located within the San Diego Air Basin (SDAB). These fugitive dust reduction measures were included in CalEEMod for site preparation and grading phases of construction. Construction activities would be required to comply with the City's Best Management Practices (BMPs) which are enforceable under San Diego Municipal Code (SDMC) Section 142.0710.

Construction emissions modeling for site preparation, grading, building construction, paving, and application of architectural coatings is based on the overall scope of the proposed development and construction phasing. Table 1, *Estimated Maximum Daily Construction Emissions*, summarizes the estimated maximum daily emissions of pollutants occurring during the construction period.

As shown in Table 1, construction of the proposed project would exceed the SDAPCD regional construction emission thresholds for ROG emissions in the year 2020. Air quality impacts from construction would be significant. In accordance with the Mitigation Framework established in the EIR for the CPU and as detailed in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum, mitigation would be required to reduce impacts to below a level of significance. These measures include minimizing simultaneous operation and idling time of construction equipment, using more efficient, low pollutant emitting and alterative fueled construction equipment, dust control measures, and use of low VOC architectural coatings for all buildings.

Table 1, *Estimated Maximum Daily Construction Emissions*

Maximum Daily Emissions (Maximum lbs/day)						
Construction Phase	**ROG**	**NO_x**	**SO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
2017	5.8	68.0	<0.1	39.6	7.1	4.5
2018	7.7	63.4	0.2	52.4	9.7	4.0
2019	7.0	58.6	0.2	48.8	9.5	3.6
2020	**306.6**	14.1	<0.1	15.1	1.3	0.7
SDAPCD Regional Thresholds	137	250	250	550	100	55
Threshold Exceeded 2017	No	No	No	No	No	No
Threshold Exceeded 2018	No	No	No	No	No	No
Threshold Exceeded 2019	No	No	No	No	No	No
Threshold Exceeded 2020	**Yes**	No	No	No	No	No

Note: Table includes emissions from the winter or summer report, whichever was greater.

Operational Impacts

Operational emissions include emissions from natural gas combustion (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site. The default weekday trip generation rate for the proposed project was revised to reflect five trips per thousand square feet of building for industrial uses as specific in the *Traffic Impact Analysis* (Kimley Horn, February 2018). Table 2, *Estimated Operational Emissions*, summarizes emissions associated with operation of the proposed project.

As shown in Table 2, the operational emissions would not exceed the SDAPCD thresholds for ROG, oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO_x), particulate matter of 10 microns in diameter or smaller (PM_{10}), or particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Therefore, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors, and violations of air quality standards) would be less than significant.

Table 2, *Estimated Operational Emissions*

Estimated Emissions (lbs/day)						
Category	**ROG**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	20.5	<0.1	0.2	<0.1	<0.1	<0.1
Energy*	0.3	2.6	2.2	<0.1	0.2	0.2
Mobile	7.6	31.9	90.1	0.3	26.4	7.2
Maximum lbs/day	**23.7**	**31.9**	**90.1**	**0.3**	**26.4**	**7.2**
SDAPCD Thresholds	137	250	250	550	100	55
Threshold Exceeded	No	No	No	No	No	No

Notes: Table includes emissions from the winter or summer report, whichever was greater.
*Energy emissions only include data for on-site use of natural gas

CO Hot Spots

CO is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and Federal CO standards. At the monitoring station located at San Diego – 1110 Beardsley Street in San Diego County, the station closest to project site that provides CO data, the maximum 8-hour average CO level recorded in 2012 was 1.81 parts per million (ppm), which is well below the 9 ppm State and

Federal 8-hour standard.

The CPU EIR reported that 28 intersections throughout Otay Mesa were found to operate at LOS E or worse. Based on the CO protocol, the three worst intersections were selected for a detailed CO Hot Spot analysis. Those intersections were:

- Otay Mesa Road and Innovative Drive
- Old Otay Mesa Road and Beyer Boulevard
- Otay Valley Road and Heritage Road

These three intersections, under the adopted Community Plan and the CPU, were modeled in CALINE4 in order to determine if the CO emissions exceeded the thresholds. The hot spot analysis concluded that the increases of CO due to implementation of the CPU would be below the Federal and State 1-hour standard. Therefore, there would be no harmful concentrations of CO and localized air quality emission would not exceed applicable standards. The proposed project would not result in new CO hotspot impacts not previously studied; thus, no new impacts related to CO hotspots would result.

Sensitive Receptors

There are no sensitive receptors in the vicinity of the project site. Nearby facilities where people would be working are the surrounding industrial buildings north and west of the project site. Operational emissions, as detailed in Table 2, above, are well below the local thresholds. Pursuant to the CPU land use designation of Heavy Commercial, the proposed project buildings could provide for retail sales, commercial services, office uses, and heavier commercial uses such as wholesale, distribution, storage, and vehicular sales and service, but residential land uses would be prohibited. Therefore, sensitive receptors would not be exposed to Toxic Air Contaminants (TAC) emissions that would substantially impact human health and no significant impacts would result. As such, the project would not trigger mitigation measures AQ-3 or AQ-4 of the CPU EIR, even if the building contained a land use as identified in Table 5.3-7 of the CPU EIR.

Odors

The project is not anticipated to include land uses that are typically associated with objectionable odors. The proposed project would involve the use of diesel-powered construction equipment. Diesel exhaust may be noticeable temporarily at adjacent properties; however, construction activities would be temporary. Therefore, this impact would be less than significant, and no mitigation is necessary.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The Otay Mesa CPU EIR concluded that air quality impacts associated with construction would be significant and not mitigated and included a Mitigation Framework that would be required for future projects. In accordance with Mitigation Measure AQ-1 of the CPU EIR, the project includes specific mitigation, detailed in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum, to ensure that construction impacts are reduced to below a level of significance. Thus, project would not result in any new significant air quality impacts or a substantial increase in the severity of air quality impacts from those described in the CPU EIR.

Biological Resources

CPU EIR

Impacts to Biological Resources are addressed in Section 5.4 of the CPU EIR. The EIR found 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. Specifically, impacts to Tier I, II, IIIA, and IIIB habitats were found to be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, non- native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Impacts to wetlands, vernal pools, and other jurisdictional water resources would also be significant.

Additionally, 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. The EIR concluded that any direct or indirect impacts to migratory wildlife nesting, foraging, and movement would be significant.

The CPU EIR requires the following mitigation measures for impacts to biological resources, which would be applicable to the proposed project.

> **BIO-1/BIO-3:** To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the CPU area, all subsequent projects implemented in accordance with the CPU shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within CPU area, focused presence/absence surveys shall be conducted in accordance with the biology guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.
>
> In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of burrowing owls on the project site. Future projects shall be required 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 in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). 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
>
> **Mitigation for Impacts to Sensitive Upland Habitats** Future projects implemented in accordance with the CPU resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan. Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, oak woodlands, coastal sage scrub, and consistent with federal, state, and City guidelines. Any required mitigation for

impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines.

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA.

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012a). These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction – Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo burrowing owl, and the cactus wren are further detailed in BIO-2.

BIO-2: Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the CPU area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines, as further detailed in BIO-1, during the discretionary review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities and shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement and nesting or foraging activities shall be addressed in the Biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons and construction noise monitoring and implementation of any species specific mitigation plans (such as a Burrowing Owl Mitigation Plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, State Fish and Game Code and/or the ESL Regulations.

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. No significant impacts relating to MSCP consistency would occur.

MHPA adjacency impacts would be addressed at the project-level. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that would demonstrate compliance with the MHPA Land Use Adjacency Guidelines. To ensure avoidance or reduction of the potential MHPA impacts resulting from new development adjacent to the MHPA, future projects would be required to comply with Mitigation Framework measure LU-2 included in Section 5.1 (Land Use) of the CPU EIR. Potential impacts associated with the introduction of invasive species into the MHPA would also be evaluated at the project-level. Mitigation Measure LU-2 requires that landscape plans processed in concert with future project not contain any exotic plant/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA. With the

requirement that Mitigation Measure LU-2 be implemented at the project level, as applicable, the CPU EIR found that potential impacts at the CPU level would be reduced to below a level of significance.

Proposed Project

The CPU EIR identified biological resources on the project site; therefore, a *Biological Technical Report* (BTR) was prepared by Alden Environmental, Inc. (February 21, 2019) for the proposed Sunroad – Otay 50 project. A copy of that report can be found in Appendix B to this addendum.

Alden Environmental (Alden) conducted surveys of the project site on March 2 and June 7, 2017. Alden also compiled lists of all plant and animal species observed/detected during all surveys. The results of Alden's surveys are presented in the BTR. A prior survey of the project site, including a burrowing owl survey, was conducted in 2016 by REC Environmental Consultants (REC). REC also mapped vegetation and compiled lists of all plants and animal species observed/detected during the survey. The results of REC's survey and mapping is included in Appendices B and C of the BTR. Thus, the BTR for the project: 1) verified/updated REC's earlier vegetation mapping; 2) looked for evidence of Waters of the U.S. (WUS), Waters of the State (WS), and City wetlands; and 3) conducted a sensitive plant survey and Quino checkerspot butterfly (*Euphydryas editha quino*) site assessment.

No potential WUS, WS, or City wetlands were observed on site on March 2, 2017 (or any of the subsequent visits). Therefore, no jurisdictional delineation was conducted.

Fifty-eight species of plants have been observed on site during all surveys to date. A list of these plant species is presented in Appendix B of the BTR.

Sensitive plant species are those that are considered Federal, State, or CNPS rare, threatened, or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. Narrow Endemic species are a subset of MSCP Covered Species. The City specifies additional conservation measures in its MSCP Subarea Plan to ensure impacts to Narrow Endemic species are avoided to the maximum extent practicable. One sensitive plant species was observed on site: San Diego bur-sage (*Ambrosia chenopodiifolia*). A list of sensitive plant species that were not observed by either Alden or REC but may have potential to occur on-site is also included in the BTR. Due to the previous, long-standing agricultural disturbance of the project site, it is unlikely that these species are present. Additionally, no Narrow Endemic plant species identified in the MSCP were observed on site.

Sensitive plant species that were not observed but may have potential to occur on site include San Diego County needlegrass, South coast saltscale, Orcutt's brodiaea, Palmer's goldenbrush, San Diego goldenstar, and Parry's tetracoccus. With the previous, long-standing agricultural disturbance of the project site, it is unlikely that these species are present.

Thirty-nine species of animals (21 invertebrates, one reptile, 10 birds, and seven mammals) have been observed or detected on-site during all surveys to-date. A list these animal species is presented in Appendix C of the BTR.

Sensitive animal species are those that are considered Federal or State threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. A species may also be considered sensitive if it is included on the CDFW Special Animals List (CDFW 2017) as a State Species of Special Concern, State Watch List species, State Fully Protected species, or Federal Bird of Conservation Concern. Three sensitive animal species were observed on-site. These include:

- California horned lark (*Eremophila alpestris actia*) – Two individuals were observed (but not mapped) in non-native grassland on site by REC in 2016.
- Burrowing owl – One individual owl was reported as occurring near the intersection of La Media and Otay Mesa Road on April 5, 2017.
- San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) – One jackrabbit was observed (but not mapped) in non-native grassland on site by REC in 2016.

A list of sensitive animal species that were not observed or detected on site but that may have potential to occur is included in the BTR.

The MHPA includes core biological resource areas and corridors targeted for conservation that preserve local and regional corridor functions. The project site is not in the MHPA, and the project's location surrounded by State highways and Otay Mesa Road on three sides severely limits, or even precludes, it from connecting off-site habitat areas. The project site may provide some resources, such as food for wildlife. But due to the site's disturbed nature from agricultural activities going back to at least 1966, those resources are limited.

Vegetation Communities

The project site supports non-native grassland, disturbed land, and developed land as shown in Table 3, *Existing Vegetation*. Figure 8, *Biological Resources*, shows the biological resources located on the project site.

Table 3, *Existing Vegetation*

Vegetation	On-site	Off-site Impact Area	Total
Upland[1]			
Non-native grassland (Tier IIIB)	46.8	0.2	47.0
Disturbed land (Tier IV)	2.3	1.5	3.8
Developed (N/A)	0.0	0.1	0.1
TOTAL	**49.1**	**1.8**	**50.9**

[1]Uplands have been divided into tiers of sensitivity (City 2012)

Non-Native Grassland

Non-native grassland on the project site is composed of more than 50 percent cover (relative) of non-native grass species such as slender wild oat (*Avena barbata*) and bromes (*Bromus diandrus, B. hordeaceus,* and *B. madritensis ssp. rubens*). Other non-native and native species are also present, such as non-native black mustard and tecalote (*Centaurea melitensis*), as well as native fiddleneck (*Amsinckia americana*). These grasslands throughout San Diego County serve as valuable raptor foraging habitat. Non-native grassland is recognized as a Tier IIIB upland habitat (common upland) by the City.

Disturbed Land

Disturbed land (based on the determination that the dense mustard on-site is an ephemeral condition) on the project site supports more than 50 percent cover (relative) of non-native plant species (that are not grasses) such as Russian thistle, black mustard, and cheese weed (*Malva parviflora*). Other non-native plant species are also present, as are some native species such as broom baccharis (*Baccharis sarothroides*) and California sagebrush (*Artemisia californica*). Disturbed land in the off-site impact area along La Media Road appears to

have been seeded with native species in the past. Disturbed land is considered Tier IV (other uplands) by the City.

Developed Land
Developed land occurs in the off-site impact areas and is comprised of pavement. Developed land has not been assigned a tier by the City.

Sensitive Vegetation Communities
Sensitive vegetation communities are those considered rare within the region or sensitive by California Department of Fish and Wildlife (CDFW) and/or the City. These communities, in any form (e.g., including disturbed or burned), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site supports one sensitive vegetation community: non-native grassland.

Direct Impacts

The entire approximately 49.1-acre project site and approximately 1.8 acres off-site along Otay Mesa Road and La Media Road would be directly and permanently impacted by the project. These impacts are shown in Table 4, *Direct Impacts to Vegetation*.

Table 4, *Direct Impacts to Vegetation*

Vegetation	On-site	Off-site Impact Area	Total
Upland[1]			
Non-native grassland (Tier IIIB)[2]	46.8	0.2	47.0
Disturbed land (Tier IV)	2.3	1.5	3.8
Developed (N/A)	0.0	0.1	0.1
TOTAL	**49.1**	**1.8**	**50.9**

[1]Uplands have been divided into tiers of sensitivity (City 2012).
[2]Considered occupied by the burrowing owl.

Impacts to Vegetation Communities
A project that would substantially diminish habitat for fish, wildlife, or plants would have a significant impact. The project would replace 47.0 acres of non-native grassland, which provides habitat for plants and animals, including the burrowing owl, with urban development. Since the City considers any impact to one acre or more of non-native grassland that is not completely surrounded by existing urban development to be significant, this impact would be significant.

A project that would result in a substantial adverse impact on any Tier IIIB habitat as identified in the Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or U.S. Fish and Wildlife Service (USFWS) would have a significant impact. Impacts would occur to Tier IIIB non-native grassland that would be considered substantial and adverse; mitigation would be required.

Impacts to Sensitive Plant Species

One sensitive plant species was observed on site: San Diego bur-sage (*Ambrosia chenopodiifolia*). One San Diego bur-sage plant was found along the side of La Media Road in the off-site impact area. Due to the fact that only one plant would be impacted, the impact is considered less than significant.

No impacts to sensitive and MSCP Narrow Endemic plant species not observed during surveys would occur. All of these species have low potential to occur or are not expected to occur based on the location of the site, the long agricultural history of the site, the habitats present, and/or because these species were not found during site surveys. Therefore, significant impacts to these species are not anticipated.

Impacts to Sensitive Animal Species

The project would not directly impact any known burrowing owl burrows, but it would impact 47.0 acres of burrowing owl-occupied non-native grassland habitat. This impact would be considered significant and mitigation would be required. The MSCP requires special measures/conditions for coverage of the burrowing owl. The MSCP requires mitigation for impacts to occupied habitat (at the Subarea plan specified ratio of 0.5:1 if within the MHPA and 1:1 if the mitigation site is outside of the MHPA) through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements. The MSCP notes that persistence of the burrowing owl in San Diego County is, in part, dependent on conservation of known concentrations of the species in Santa Maria Valley.

Impacts to the California horned lark would occur from habitat removal and potential injury or mortality to this species that forages on the ground. The California horned lark is a State Watch List species; it is not an MSCP Covered Species. Impacts to this species would be significant due to the acreage of lost habitat and potential injury and mortality. Mitigation would be required.

Impacts to the San Diego black-tailed jackrabbit would also occur from habitat removal and potential injury or mortality to very young jackrabbit litters that may be immobile. The San Diego black-tailed jackrabbit is a State Species of Special Concern; it is not an MSCP Covered Species. Impacts to this species would be significant due to the acreage of lost habitat and potential injury and mortality. Mitigation would be required.

Of the sensitive animal species not observed or detected but that have a potential to occur on-site, all have either very low or low potential to occur with the exception of the northern harrier. There is low to moderate potential for the northern harrier to utilize non-native grassland on site. Direct impacts to non-native grassland habitat of the northern harrier, should the harrier be present, would be significant and mitigation would be required.

Impacts to Raptor Foraging Habitat

Loss of non-native grassland due to development of the project would result in a loss of potential raptor foraging habitat (Tier III B non-native grassland). The loss of raptor foraging habitat would be significant due to substantial adverse impacts, either directly or through habitat modifications, to sensitive species and substantial adverse impact on sensitive natural communities. Mitigation would be required.

Impacts to Wildlife Corridors

The project site is surrounded by State highways and Otay Mesa Road on three sides, which severely limits, or even precludes, it from connecting off-site habitat areas. Therefore, the project would not significantly alter wildlife movement.

Impacts to Waters of the U.S., Waters of the State, and City Wetlands

There are no Waters of the U.S., Waters of the State, or City wetlands on-site. Thus, no impacts to these resources would occur.

Indirect Impacts

Indirect impacts consist of secondary effects of a project that can occur during construction or from a project once built. The magnitude of an indirect impact can be the same as a direct impact, but the effect usually takes a longer time to become apparent. For this project, indirect impacts could occur from erosion/sedimentation/ pollution, fugitive dust, lighting, noise, and invasive plant species and are discussed below.

Erosion/Sedimentation/Pollution

Water quality can be adversely affected by potential surface runoff and sedimentation during construction. The use of petroleum products (fuels, oils, and/or lubricants) and erosion of cleared land during construction or from runoff from parking lots, for example, can pollute downstream surface waters. Decreased water quality may adversely affect vegetation, aquatic animals, and terrestrial wildlife that depend upon these resources.

Potential erosion/sedimentation/pollution impacts from project construction would be minimized through the required use of the City's Construction Site Best Management Practices (SDMC §43.0301; BMPs) and by project design that would capture, treat, and store storm water runoff before it enters undeveloped or transitional areas consistent with the existing drainage conditions and per current storm water regulations. The project proposes bioretention areas in the center and western portions of the site and a detention basin for the southwest portion of the site that would address potential issues with contaminated runoff from the built project.

The use of BMPs, bioretention areas, and a detention basin would adequately address potential issues of erosion/sedimentation/pollution during construction and occupancy of the built project. Therefore, potential impacts would be less than significant, and no mitigation would be required.

Fugitive Dust

Fugitive dust produced by construction can disperse onto adjacent vegetation. A continual cover of dust may reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals dependent on these plants. Fugitive dust also may make plants unsuitable as habitat for insects and birds. Fugitive dust impacts to adjacent, off-site habitat can have potential to be significant. Construction of the project would include the use of dust control measures required in SDMC Section 142.0101 et seq. Therefore, the project would result in less than significant impacts from fugitive dust, and no mitigation would be required.

Lighting

Night lighting exposes wildlife to an unnatural light regime that may adversely affect foraging patterns, increase predation risk, cause biological clock disruptions, and result in a loss of species diversity. Lighting can be a significant indirect impact if it spills into ESL (such as non-native grassland off site). The proposed project would adhere to the City's Outdoor Lighting Regulations (SDMC §142.0740) which limits negative impacts from light pollution, including light trespass, glare, and urban sky glow, in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Therefore, potential night lighting impacts would be less than significant, and no mitigation would be required.

Noise

Construction-related noise from such sources as clearing, grading, and construction vehicular traffic can result in significant, temporary noise-related impacts to wildlife in undeveloped habitat adjacent to the project site. Noise-related impacts, however, would only be considered significant if a sensitive species is present that is susceptible to noise, such as the coastal California gnatcatcher. There are no such species present adjacent to the project site (there is no potential habitat for such species there), so there would be no construction-related noise impacts to wildlife.

Invasive Plant Species

Invasive, non-native plants can colonize areas disturbed by construction and potentially spread and impact nearby sensitive plant and animal species. Such invasions could displace native plant species, reduce diversity, increase flammability and fire frequency, change ground and surface water levels, and adversely affect the native wildlife that are dependent on native or naturalized vegetation. This impact can also occur if invasive, non-native plant species are included in a project's landscaping. The project landscaping would not utilize invasive plant species. The project site and surrounding area, which is not natural open space, are already colonized by invasive, non-native plant species. Therefore, there would be no impact from the project related to such species, and no mitigation would be required.

Cumulative Impacts

The MSCP is designed to compensate for the cumulative loss of biological resources throughout the San Diego region. Projects that conform to the MSCP as specified by the City's Subarea Plan and implementing ordinances, (i.e., Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through Tier IV and MSCP Covered Species. The project would comply with the City's Subarea Plan by mitigating for significant impacts in accordance with ESL Regulations and the City's Biology Guidelines (see Mitigation Measures listed below). Other projects in the City would also be required to comply with the City's Subarea Plan. Therefore, the project would not contribute considerably to cumulatively significant impacts on sensitive biological resources in the City, and no mitigation for cumulative impacts would be required.

MSCP Evaluation

The City's MSCP Subarea Plan provides policies and guidelines that require project compliance. These policies/guidelines are addressed below.

General Planning Policies and Design Guidelines

Section 1.4.2 of the City's MSCP Subarea Plan includes general planning policies and design guidelines that have been applied in the review and approval of development projects within or adjacent to the MHPA. The project is not within or adjacent to the MHPA; therefore, these policies and guidelines are not applicable.

General Management Directives

General management directives have been prescribed for all areas of the City's MSCP Subarea Plan, as appropriate. The one that applies to the project is listed below. Directives related to Public Access, Trails, and Recreation; Adjacency Management Issues; Invasive Exotics Control and Removal; Litter/Trash and Materials Storage; and Flood Control are not applicable to the project.

1. Mitigation shall be performed in accordance with ESL Regulations and the City's Biology Guidelines.

Area Specific Management Directives

The MSCP requires special measures/conditions for coverage of the burrowing owl. The MSCP requires mitigation for impacts to occupied habitat (at the Subarea plan specified ratio) through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements. The MSCP notes that persistence of the burrowing owl in San Diego County is, in part, dependent on conservation of known concentrations of the species in Santa Maria Valley.

There is low to moderate potential for the northern harrier to utilize non-native grassland on-site. The northern harrier is a State Species of Special Concern; it is also an MSCP Covered Species with special conditions for its coverage prescribed in Appendix A of the City's Subarea Plan. Those conditions for coverage include Area Specific Management Directives for managing lands conserved as part of the preserve. None of the project site is proposed to be part of the preserve, nor is it adjacent to the preserve. Direct impacts to non-native grassland habitat of the northern harrier, should the harrier be present, would be significant according to Significance Criterion 1 (substantial adverse impacts to sensitive species). Mitigation would be required.

Mitigation Measures

The project would impact sensitive vegetation and sensitive animal species, as well as raptor foraging habitat. In accordance with the CPU EIR and the project-specific BTR and as required by the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines, the project would include mitigation measures, detailed in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum that would reduce the potentially significant impact to below a level of significance.

Typically, impacts to non-native grassland located outside the MHPA and mitigated also outside of the MHPA require a mitigation ratio of 1:1, or 0.5:1, if mitigated inside the MHPA. However, after unsuccessfully attempting to locate burrowith owl mitigation sites within the City, the applicant identified the Turacek parcel, located outside City jurisdictional boundaries, as a potential site. Consequently, Wildlife Agency concurrence was necessary. Because the Turacek parcel is part of an identified "node", i.e. it has been identified by the Wildlife Agencies, the County of San Diego, and the City of San Diego as a preferred location for concentrated preservation, restoration or enhancement of burrowing owl habitat, and the mitigation proposal requires enhancement of the parcel [see Turacek Resource Management Plan (RMP; March 4, 2019), Appendix M to this Addendum], it was determined that a 0.5:1 mitigation ratio would reduce impacts to occupied burrowing owl habitat to below a level of significance. (Both the Turacek parcel and the associated RMP are discussed in greater detail below.) Thus, mitigation for impacts to 47.0 acres of burrowing owl-occupied non-native grassland from the project shall occur at a ratio of 0.5:1.

To, in part, satisfy the required 23.5 acres of non-native grassland mitigation, the 18.75 acre (net) Turecek parcel is proposed to be preserved and enhanced for the burrowing owl. The Turecek parcel is in the County of San Diego at the corner of Harvest Road and Lonestar Road, approximately 0.75 mile northeast of the project site. This site is adjacent to a burrowing owl node and supports suitable features (non-native grassland) to be used as foraging habitat for burrowing owls. Soils on the parcel are mapped as Diablo clay and are not noted as being friable. The remaining required 4.75 acres of non-native grassland mitigation would be satisfied through acquisition of 4.75 acres of non-native grassland credits from the Ramona Grasslands Preserve in San Diego County (this bank

currently has available credits). The project proponent is currently in contact with the owner to purchase the credits and will be responsible for carrying out the implementation and funding of the mitigation. With implementation of project-specific mitigation that would occur prior to grading, and the issuance of the Certificate of Occupancy as detailed in the RMP, impacts to sensitive animal species would be reduced to below a level of significance.

The preservation and enhancement of the Turecek parcel in the County of San Diego and the purchase of credits in the Ramona Grasslands Preserve located in Santa Maria Valley is consistent with the Mitigation Framework included in the CPU EIR and deemed appropriate mitigation for project impacts based on the following.

Turecek Parcel

The East Otay Mesa/Otay Mesa area is currently the primary location of burrowing owls in San Diego County. The Turecek parcel is located in East Otay Mesa in the County of San Diego. The County of San Diego' s goals and objectives for burrowing owls in East Otay Mesa emphasize long-term habitat conservation, habitat improvement, and creation and maintenance of as much native and naturalized habitat as possible for burrowing owls. One of the goals for burrowing owls in East Otay Mesa is to preserve grasslands. The 18.75-acre Turecek parcel supports non-native grassland that would be preserved as mitigation for the project. Another goal of the County is to establish two burrowing owl nodes of at least 150 acres each in East Otay Mesa. The Turecek parcel is located just southeast of one of the East Otay Mesa nodes and, therefore, would contribute to the establishment and enlargement of that node. Preservation and enhancement of squirrel and burrowing owl habitat on the parcel would further contribute toward meeting the node goal.

The *Resource Management Plan for the Turecek Off-site Mitigation Parcel* was prepared by Alden Environmental, Inc. (March 4, 2019). A copy of that report can be found in Appendix M to this addendum. The Resource Management Plan (RMP) provides direction for the permanent preservation, enhancement, and management of the Turecek parcel in accordance with City of San Diego requirements and consistent with the CDFW Staff Report on Burrowing Owl (2012). Goals identified in the RMP would facilitate the establishment and maintenance of a self-sustaining colony of California ground squirrels as a means to provide suitable habitat for year-round occupation by the burrowing owl. Thus, the habitat mitigation that would occur on the Turecek parcel supports non-native grassland and has the potential to support the burrowing owl. The purpose of this RMP is to provide measures and conditions to help establish and maintain a self-sustaining colony of California ground squirrels as a means to provide suitable habitat for year-round occupation by the burrowing owl. The RMP would enhance the parcel for burrowing owl and contribute toward meeting the node goal discussed above.

The RMP addresses financial responsibility/mechanism, cost estimate, reporting requirements and includes the following key elements:

- Initial Tasks, including initial fencing/access control, trash/debris removal, initial mowing, dethatching, weed removal, berm placement, and brush pile placement.
- Biological Management Activities, including baseline inventory, and a BUOW survey.
- Vegetation Monitoring, including general monitoring, annual monitoring report and work plan, biological database, and management plan review.

- Operations, Maintenance, and Administration Tasks, including mowing/clearing, fence/sign repair, weed removal, trash and debris removal, public use, fire management, illegal occupancy, removal of resources, hazardous materials monitoring, and management constraints, as well as how to address changes and amendments to the RMP.

A Resource Manager would be selected and would be responsible for interpreting the results of site monitoring to determine the ongoing success of the RMP. Specific success goals identified in the RMP include the establishment and maintenance of 75 percent cover by vegetation dominated by low-growing plants (between 4-6 inches in height) to support ground squirrel and burrowing owl. The project applicant would be responsible for all mitigation and management funding requirements as described in the RMP (assured as a condition of approval of the project). The project applicant would be responsible for all RMP funding requirements.

Ramona Grasslands Preserve

The Ramona Grasslands Preserve comprises a significant portion of the Santa Maria Creek subbasin of the San Dieguito River watershed. The Preserve hosts a unique assemblage of resources and functions as a core habitat area within a regional network of existing and anticipated conservation lands. The coastal sage scrub, chaparral, and oak woodlands of the surrounding landscape, together with the grasslands, riparian habitat, and vernal wetlands of the core area, constitute an exceptional concentration of regionally and globally significant resources. That significance is reflected by the near complete overlap of the Preserve area by federal Critical Habitat designations (San Diego fairy shrimp, arroyo toad, and California gnatcatcher).

Burrowing owls are known to have inhabited the Ramona Grasslands Preserve historically and a few pairs reside there. The MSCP requires that management plans include enhancement of known, historical and potential burrowing owl habitat and management for ground squirrels (the primary excavator of burrowing owl burrows), monitoring of burrowing owl nest sites to determine use and nesting success, predator control, and establishing a 300-foot-wide impact avoidance area (within the preserve) around occupied burrows. The Ramona Grasslands Preserve Resource Management Plan (County of San Diego 2013) addresses these conditions for the Preserve.

Northern Harrier Area Specific Management Directives for the northern harrier must manage agricultural and disturbed lands (which become part of the MSCP preserve) within four miles of nesting habitat to provide foraging habitat and include an impact avoidance area (900 foot or maximum possible within the MSCP preserve) around active nests. They also include measures of maintaining winter foraging habitat in preserve areas in Proctor Valley, around Sweetwater Reservoir, San Miguel Ranch, Otay Ranch east of Wueste Road, Lake Hodges, and San Pasqual Valley. The northern harrier is not known to breed in the Ramona Grasslands Preserve, so nest impact avoidance is not an issue at the Preserve. The northern harrier is known to forage and winter there, however. Agricultural land occurs in the Preserve and consists of an area that was heavily grazed by cattle. Disturbed habitat occurs in the Preserve primarily as ranch roads that are bare ground. One of the goals of the management of the Preserve is to maintain connectivity through natural lands as well as agricultural lands to other preserved habitat for raptors; the latter of which would maintain agricultural foraging habitat for the harrier. One purpose of the Ramona Grasslands Preserve Resource Management Plan is to preserve and manage the biological resources in the Preserve to protect and, where appropriate, enhance biological values, which would include raptor foraging habitat.

The Turecek parcel supports non-native grassland that is potential foraging and nesting habitat for the northern harrier. The *Resource Management Plan for the Turecek Off-site Mitigation Parcel* (Alden Environmental, Inc. March 4, 2019) and a stand-alone habitat enhancement plan prepared for City and Wildlife Agency approval for

the Turecek parcel address the potential need for an impact avoidance area around an active nest on the Turecek parcel.

Mitigation land outside the City requires CDFW and USFWS concurrence, consistent with MSCP Subarea Plan Implementing Agreement. Prior to the issuance a grading permit, a covenant of easement in favor of the City, CDFW, and USFWS shall be placed over the preserved mitigation land. In addition, implementation of the RMP will be a condition of approval for issuance of the grading permit.

Mitigation for Direct Impacts to Sensitive Animal Species

San Diego Black-tailed Jackrabbit, Raptor Foraging, and California Horned Lark
Direct impacts to San Diego black-tailed jackrabbit, raptor foraging, and California horned lark nonnative grassland habitat from the project shall be mitigated as described in Section 7.2.1 in the BTR, Mitigation for Direct Impacts to Upland Vegetation. Potential indirect impacts to individuals of the San Diego black-tailed jackrabbit and California horned lark shall be mitigated through implementation of the measures outlined in Section 7.1 in the BTR, Biological Resource Protection During Construction Including General Avian Protection.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project is consistent with all CPU EIR mitigation measures relevant to sensitive plant and animal species and migratory birds. The project includes mitigation measures for upland habitat, San Diego black-tailed Jackrabbit, raptor foraging, and California horned lark, and burrowing owl, which align with the requirements and guidelines listed in the CPU EIR Mitigation Framework. The project would not result in any new significant impacts or a substantial increase in the severity of impacts from those described in the CPU EIR.

Historical Resources

CPU EIR

The CPU EIR evaluated impacts to historical resources in Section 5.5. The CPU EIR found that due to the number and density of prehistoric and historical resources in the CPU area, future development has the potential to result in the loss of resources, which would be a significant impact at the program level. Impacts from future development on the built environment would occur at the project level. Any alteration, relocation, or demolition associated with future development that would affect historic buildings, structures, objects, landscapes, and sites would represent a significant impact to historical resources. Implementation of the Mitigation Framework for Historical Archaeological Resources (Mitigation Measure HIST-1) detailed in the CPU EIR would reduce impacts associated with future development projects to below a level of significance. Mitigation Measure HIST-1 required that, prior to issuance of any permit for a future development project implemented in accordance with the CPU area that could directly affect an archaeological resource, steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.

Proposed Project

A *Cultural Resources Survey* was prepared by Rincon Consultants, Inc., in April 2017 for the proposed project and can be found as Appendix C to this Addendum. Based on records search and pedestrian survey, no archaeological resources have been identified within the project area. The project site is a vacant site and, therefore, no built resources exists on the site. The project site is not designated or listed, either individually or as part of a district, on a local, State, or national historical sites register. Previous studies of the project site have determined that the project site represents a surface manifestation of artifacts and is not eligible for the NRHP or the California Register of Historical Resources (CRHR). The Otay CPU notes that the project site is not significant and recommends no further study of this resource. While there are no reported resources on the project site, the site-specific *Cultural Resources Study* set forth mitigation measures in the case of unanticipated discoveries during project execution. Impacts would be less than significant. In accordance with the Mitigation Framework presented in the CPU EIR, the project would implement the mitigation measures, detailed in Section VI, *Mitigation Monitoring and Reporting Program,* of this Addendum that would reduce potential impacts associated with Historical Resources to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. In accordance with Mitigation Measure HIST-1 of the CPU EIR, the project includes specific mitigation to ensure that impacts to historical resources (archaeological) are reduced to below a level of significance. The project would not result in any new significant historical resources impacts or a substantial increase on the severity of impacts to historical resources from that described in the CPU EIR.

Human Health/Pubic Safety/Hazardous Materials

CPU EIR

Section 5.3, Air Quality, of the EIR health risks associated with toxic air contaminants. (See discussion above in this Addendum under Air Quality.) The CPU EIR evaluates human health relative to public safety and hazardous materials impacts in Section 5.6. The CPU EIR found that the CPU would have significant impacts associated with wildfires, aircraft hazards, and hazardous sites and presents a Mitigation Framework, requiring Mitigation Measures HZ-1, HZ-2, and HZ-3 to be implemented at the project level in order to reduce impacts to below a level of significance.

<u>Wildfire Hazards</u>

The CPU EIR found that the existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures. These goals and policies are aimed at reducing the risk of wildland fires. Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. However, because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. Therefore, impacts associated with wildfires would be significant at the program-level.

Aircraft Hazards

Implementation of the General Plan and CPU policies that address land use compatibility would support the development of future uses consistent with the adopted ALUCP. This would preclude any health and safety issues associated with off-airport aircraft accidents. Future discretionary projects within the CPU area, located within the AIA for Brown Field, would be submitted to the ALUC for a consistency determination. However, future projects could conflict with the FAA requirements unless the City implements a mechanism to ensure either the project would not include features identified in Part 77 criteria for notification or the project obtains a No Hazard to Air Navigation from the FAA. Thus, potential aircraft hazards impacts would be potentially significant.
Future projects developed in accordance with the CPU have the potential to conflict with FAA requirements and result in a significant aircraft hazards impact. With implementation of HAZ-2, potential future project aircraft hazards impacts would be reduced to below a level of significance.

Hazardous Sites

The presence of sites compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the CPU area. Future development implemented in accordance with the CPU would be required to implement the Mitigation Measures HZ-3, which requires preparation of a Phase I Site Assessment, consultation with the appropriate regulatory agency and verification that health risk has been remediated in accordance with all applicable local, State and Federal regulations. In addition, implementation of the policies contained in the General Plan, CPU, and regulations imposed by Federal, State, and local agencies, including the U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA), California Department of Health Services (DHS), County of San Diego County Department of Environmental Health (DEH), and California Department of Transportation (Caltrans) would reduce potential impacts to below a level of significance.

Proposed Project

Wildfire Hazards

As discussed in the CPU EIR, all future projects implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and CPU policies intended to reduce the risk of wildfires. The project site borders an urbanized developed area to the north, west, and south. The project site's proximity to native vegetation in the open space to the northeast could present wildland fires as a significant threat. However, the proposed project would follow fire management policies, rules, and regulations established by the City of San Diego, County of San Diego Office of Emergency Services, and the California Department of Forestry and Fire Protection such as policies and regulations addressing wildfire evacuation and fire prevention. Compliance with those policies, rules, and regulations would reduce the impacts related to exposure of people or structures to a significant risk of loss, injury, or death from wildland fires to less than significant. Impacts would be less than significant. No mitigation measures are required.

Aircraft Hazards

A discussed in Section 5.6.3 of the CPU EIR, 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 proposed project is located within AIA Review Area 1 and the FAA Part 77 Notification Area for Brown Field. Although the project site overlaps with the ALUCP compatibility zone area for the aforementioned airport, the proposed project would

not include elevated features that could interfere with navigable airspace. Therefore, implementation of the proposed project would not result in a safety hazard for people working in the project area. Impacts would be less than significant. No mitigation measures are required.

Hazardous Sites

Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction of the proposed project would involve the transport, use, and disposal of hazardous materials such as fuel, solvents, chemicals, and oils associated with operating construction equipment. Such transport, use, and disposal would be compliant with all applicable regulations and requirements. Although small amounts of fuel, solvents, chemicals, and oils would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of actively hazardous materials. Once completed, the proposed project could require the routine transport, use, or disposal of hazardous materials, depending on the specific uses within the building on-site. However, the transport of such materials would comply with all regulations and would not create a significant hazard to public health. Implementation of the proposed project is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts associated with hazardous materials would be less than significant.

An EnviroFacts and Government Code Section 65962.5 (Cortese List) search was undertaken (concluded April 24, 2017) for the proposed project (Appendix K) . The search found that there are no EnviroStar Cleanup Sites and Permitted Sites of any manner located within the project boundary. The search also found that per CalEPA.gov, there are no California Environmental Protection Agency (CalEPA) Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit within the project boundary or in the whole of San Diego County. Finally, there are no leaking underground storage tanks, cleanup sites, or permitted sites of any manner located within the project boundary. The proposed project would not be located on a site which is included on a list of hazardous materials sites and, therefore, would not create a significant hazard to the public or the environment. No mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant impacts associated with human safety and hazards or a substantial increase in the severity of impacts from that described in the CPU EIR.

Hydrology/Water Quality

CPU EIR

The CPU EIR analyzed potential impacts to Hydrology and Water Quality in Section 5.7. Hydrology/Water Quality. The CPU EIR found that buildout in accordance with the CPU would result in an increase in impervious surfaces and associated increased runoff, and result in alterations to on- and off-site drainage. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts associated with runoff and alternations to on- and off-site drainage patterns. Buildout in accordance with the CPU also has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties and could result in significant direct and indirect impacts to the natural drainage system. Future development within the CPU area could potentially impact the existing course and flow of flood waters, resulting in potentially significant impacts. Adherence to Federal, State, and local regulations, would serve to reduce significant impacts to a degree, but

cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Therefore, impacts associated with water quality would be significant at the program-level. The EIR includes a Mitigation Framework that requires adherence to specific Mitigation Measures (HYD/WQ-1 and HYD/WQ-2) which, when implemented, would reduce impacts associated with Hydrology and Water Quality to below a level of significance.

Mitigation Measure HYD/WQ-1 requires that project applicants demonstrate that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate all practicable measures in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

Mitigation Measure HYD/WQ-2 requires that future projects be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall ensure that any impacts on receiving waters shall be precluded and, if necessary, mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Storm Water Standards Manual.

Proposed Project

Because the project is identified as a "priority" project, a *Storm Water Quality Management Plan* (SWQMP) was prepared by Kimley-Horn and Associates, dated October 6, 2017, as well as a *Drainage Report* (October 6, 2017). These reports can be found as Appendix D and Appendix E, respectively, to this Addendum.

According to the CPU EIR, all future projects are subject to the requirements of the Storm Water Standards, which includes design of new or improved drainage system to meet local and State regulatory requirements satisfactory to the City Engineer. Future development implemented in accordance with the CPU would be subject to strict adherence to the Mitigation Framework, requiring regulatory compliance which ensures that the General Plan and CPU polices for reducing storm water run-off and potential impacts to natural drainage systems and associated downstream resources are implemented that reduce impacts to below a level of significance.

Additionally, the "1987 NOTICE from Engineering and Development Department," which addresses drainage requirements for development in Otay Mesa, requires that all property in Otay Mesa that is within the water shed that drains into Mexico provide storm water detention facilities so that there will be no increase in the rate of runoff due to development of the property. Additionally, the detention facilities shall be designed so that the rate of runoff from the property will not be greater after development than it was before development for a 5-year, 10-year, 25-year, and 50-year storm.
The project site is not located within an identified flood hazards area or within a 100-year flood hazard area. The project site overland flows from the northeast corner leading initially southwest over to Piper Ranch Road and then west to the end of the property. The undeveloped property to the west slopes to the west leading to existing storm drain structures at the corner of La Media Road and Otay Mesa Road.

Run-off generated from development of the project site would be collected by on-site inlets, conveyed through an underground storm drain system, and discharge into on-site detention basins for treatment and detention. All

flows would discharge through the point of compliance in the south-western portion of the project site by making a connection within the Caltrans right-of-way in an existing drop inlet with a 42-inch culvert that crosses under State Route 905. The culvert discharges into an unnamed natural channel on the south side of State Route 905. The natural channel conveys flows indirectly to the Tijuana River and ultimately to the Pacific Ocean.

In accordance with City requirements, a SWQMP has been prepared for the project. The SWQMP identifies the following as expected pollutants from the project site: nutrients, oxygen demanding substances, and pesticides. All Priority Development Projects (PDPs) must implement structural BMPs for storm water pollutant control. The proposed project would implement biofiltration BMPs, and public streets and mass graded pads would drain to a biofiltration basin for treatment.

The project would result in approximately 83 percent impervious surfaces with landscaped slopes and parkway landscaped areas. Graded and disturbed areas would be re-vegetated and landscaped to minimize erosion. The post construction site would have minimal risks of erosion occurring given proper plant establishment and transport of sediments downstream would be significantly reduced by means of pretreatment and proposed on-site detention basins with no off-site discharge location.

Development of the project site results in an increase of peak discharge runoff. Detention basins are proposed to manage peak flows by storing storm water runoff and controlling release of flow. Biofiltration areas are proposed throughout the project to provide storm water treatment for the pollutants discharged from the proposed improvements. Three biofiltration basins would be located in the west and southwest portions of the project site. Four biofiltration basins would be located between Buildings 1 and 2, and landscape islands would be constructed throughout the proposed parking areas. Per the OMCPU Drainage Study, Otay Mesa watersheds are required to detain developed flow to pre-existing conditions for the 5-, 10-, 25-, and 50-year storm events with the 100-year storm passing undetained over the spillway. The project adheres to these design criteria for detention basin sizing.

The project would not result in any significant alteration of water quality or violate any water quality standards. No impact would result. No mitigation measures are required.

In accordance with the SDMC, the property owner would be required to enter into a Storm Water Management and Discharge Control Maintenance Agreement (Maintenance Agreement) for the installation and maintenance of permanent storm water BMPs prior to issuance of construction permits. The Maintenance Agreement is intended to ensure the establishment and maintenance of permanent storm water BMPs on-site and described in the SWQMP and shown on the Vesting Tentative Map. Additionally, the proposed project would be required to adhere to all storm water construction requirements of the State Construction General Permit, Order No. 2009-0009DWQ, or subsequent order, and the Municipal Storm Water Permit, Order No. R9-2013-0001, or subsequent order. In accordance with Order No. 2009-0009DWQ, or subsequent order, a Risk Level Determination shall be calculated for the site and a Storm Water Pollution Prevention Plan (SWPPP) shall be implemented concurrently with the commencement of grading activities.

The physical alteration of water bodies, including wetlands and streams, are regulated by Federal and State statutes under Section 401 (Certification) and Section 404 (Permits) of the Federal Clean Water Act. This project does not propose any discharge of dredged and/or fill material within any Waters of the U.S. and therefore, is not subject to the Clean Water Act Sections 404 Permit and 401 Certification.

The depth to perched groundwater at the project site was estimated to be approximately 16 to 36 feet. Groundwater is expected to be encountered during grading of the property and dewatering and/or soil stabilization may be required during grading. Although groundwater is expected to be encountered during

construction activities, the project would not deplete groundwater supplies or interfere with groundwater recharge. Impacts would be less than significant. No mitigation measures are required.

The proposed project would not significantly alter the drainage pattern of the project site or area. To comply with current storm water regulations, bioretention BMPs would be implemented to control the anticipated increase in pollutant loads and peak runoff from the proposed development. Adherence with the standards would preclude a cumulatively considerable contribution to erosion of siltation on- or off-site. The project would utilize detention basins and biofiltration to manage storm water; all runoff would enter an existing drainage structure located by the SR-905 off-ramp at La Media Road. The project would not result substantial erosion or siltation. Impacts would be less than significant. No mitigation measures are required.

While the project would increase storm water run-off from the site, it would not significantly alter the overall drainage pattern of the site or area in a manner that would result in substantial increase in the rate or amount of surface runoff. No impact would occur and no mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant hydrology or water quality impacts or a substantial increase in the severity of impacts from those described in the CPU EIR.

Geology/Soils

CPU EIR

Impacts to geology and from geologic hazards were analyzed in Section 5.8 of the CPU EIR. The CPU area is located in a seismically active region of California; therefore, the potential exists for geologic hazards, such as earthquakes and ground failure. The CPU EIR states that the CPU area is underlain by three surficial soils deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium (unmapped), and alluvium. The geologic formations include Pleistocene Very Old Paralic Deposits (formerly the Lindavista Formation), Upper Pliocene San Diego Formation, and Pliocene Otay Formation.

The CPU is within a moderate to high geologic risk area. Portions of the CPU area are underlain by undocumented fill, colluvium/topsoil, and alluvium. These soils are typically loose, dry, and contain rubble, and are unsuitable for support of settlement-sensitive structures. The clay mudstone strata within the Very Old Paralic Deposits exhibits high to very high expansion potential. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils were found to be a potentially significant impact for future development. The CPU EIR also found that, based on 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, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys.

In order to ensure that impacts associated with Geology and Soils are reduced to below a level of significance, the CPU EIR required implementation of Mitigation Measures GEO-1 and GEO-2, included as part of the CPU Mitigation Framework, for future projects in the CPU area. GEO-1 requires future development in accordance with the CPU to comply with the recommendations included in a geotechnical report prepared in accordance with City Geotechnical Report Guidelines, the California Building Code (CBC), and the SDMC, and be designed satisfactory to the City Engineer. GEO-2 states that as a part of the future development permitting process, the City shall require individual project to adhere to the Grading Regulation and National Pollutant Discharge Elimination System (NPDES) permit requirements, as well as the California Building Code, to avoid or reduce geologic hazards.

Proposed Project

An *Updated Geotechnical Investigation* was prepared by Geocon, Inc. (March 31, 2017) for the proposed project. This report can be found as Appendix F to this Addendum.

The geotechnical investigation concluded that three surficial soil deposits and one geologic formation exist at the project site. Surficial soil consists of undocumented fill, topsoil, and Quaternary-age Very Old Paralic Deposits (formerly Lindavista Formation). The geologic unit is the Tertiary-age Otay Formation. Groundwater was encountered at depths of 16 to 36 feet.

According to the site-specific geotechnical investigation, the site is not underlain by active, potentially active, or inactive faulting. This site is not located within State of California Earthquake Fault Zone. However, the project site can be considered to lie within a seismically active region, as can all of Southern California. The Newport-Inglewood/Rose Canyon Fault is located approximately 11 miles west of the site and is the dominant source of potential ground motion for the area. The effect of seismic shaking can be diminished to below a level of significance by adhering to the California Building Code and current seismic design practice. Because the project is required to follow the California Building Code, impacts relative to seismic ground shaking are considered less than significant. Due to the anticipated depth to permanent groundwater and dense nature of the surficial soils at the site, the risk associated with liquefaction hazard at the site is low. No faults are mapped transecting the site. Therefore, surface rupture hazard due to faulting is considered very low. The risk associated with inundation hazard due to tsunamis or seiches is low as the project site is located approximately 14 miles from the Pacific Ocean. No landslides were encountered at the site or mapped in an area that could impact development of the property. Landslides are mapped outside and to the southwest of the project site. The risk associated with landslide hazard is low for this project. The project would be constructed consistent with proper engineering design, in accordance with the California Building Code. Utilization of appropriate engineering design measures and standard construction practices, to be verified at the building permit stage, would ensure that potential impacts from geologic hazards would be less than significant. No mitigation measures are required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant geologic impacts or a substantial increase in the severity of impacts from those described in the CPU EIR.

Energy Conservation

CPU EIR

The CPU EIR analyzed energy conservation in Section 5.9 of the CPU EIR. The CPU EIR found that the CPU would not result in the use of excessive amounts of fuel or other forms of energy use during the construction of future projects under the CPU, and construction impacts would be less than significant. Implementation of the CPU was not anticipated to result in a need for new electrical systems of 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. No mitigation measures are required.

Proposed Project

The proposed project would adhere to all State and local mandates for energy conservation, as well as the energy reduction measures set forth in the CPU polices. These policies include incorporating energy saving technology in

truck parking areas to reduce idling, and plan for energy efficiency through street orientation, building placement, and the use of shading in development plans. The project's site plan design allows for efficient access through and around the project site. The project's landscape plan includes ample trees on the perimeter of the site, as well as in internal parking areas, to provide shade to minimize heat gain.

At a minimum, future projects implemented in accordance with the CPU are required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code). Some efficiencies associated with the Energy Standards under Title 24 include the building heating, ventilating, and air conditioning (HVAC) mechanical system, water heating system, and lighting system.

Within the Climate Change and Sustainability section of the CPU's Conservation Element, a policy states that in order to reduce project-level GHG emissions to acceptable levels through project design, application of site-specific mitigation measures or adherence to standardized measures outlined in the City's adopted citywide Climate Action Plan should take place. The project would meet the CAP's goals and requirements as demonstrated in the project-specific CAP Consistency Checklist. The combination of planned sustainable building techniques and energy efficiency practices would result in a decrease in energy requirements relative to the current energy code.

The project would not result in the use of excessive amounts of fuel or other forms of energy during the construction phase. Implementation of the project is not anticipated to result in the need for new electrical systems or require a substantial alteration of existing utilities. Therefore, impacts associated with energy use would be less than significant. No mitigation measures are required,

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant energy conservation impacts or a substantial increase in the severity of impacts from those described in the CPU EIR.

Noise

CPU EIR

The CPU EIR evaluated potential impacts from noise in Section 5.10. The CPU EIR found that traffic-generated noise impacts based on future traffic volumes would result in potentially significant cumulative impacts due to the proximity of noise sensitive land uses in areas where exterior noise levels would exceed noise and land use compatibility standards established in the City's General Plan Noise Element. Stationary noise from commercial and industrial uses located in proximity to noise sensitive uses were determined to be a potentially cumulative significant impact. While it was not anticipated that projects implemented under the CPU would result in significant noise impacts, because noise generation of future developments within the CPU area could not be adequately quantified at that time. Future projects that would exceed the City's noise thresholds would be required to adhere to the Mitigation Framework included in the EIR, including Mitigation Measures NOI-1, NOI-2, and NOI-3 that require site-specific noise analyses be conducted for future development projects.

The CPU EIR also evaluated the potential for noise impacts associated with existing residential uses located within the 60 and 65 CNEL contours for Brown Field and existing and future industrial uses located within the General Abelardo L. Rodriguez International Airport 70 CNEL contour. Residential and industrial land uses would be considered conditionally compatible their respective noise levels, as long as the uses meet the interior noise level standards. No new residential land uses are proposed within the Brown Field contours, thus no new impact on future residential uses are anticipated with buildout of the CPU. Additionally, noise levels would not exceed 70 CNEL at any nearby industrial uses. Based on the standard attenuation associated with commercial and industrial,

exterior noise levels of 70 CNEL would be reduced to 40-45 CNEL within structures located within this zone. Therefore, impacts to future land uses would be less than significant.

As discussed above, the CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The EIR determined that the juxtaposition of these land uses would result in potentially significant noise impacts. While the framework of federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance, no project-level site plans or implementation programs were considered as part of this EIR. Without detailed operational data, the EIR stated that compliance with existing regulations would reduce all impacts to below a level of significance and concluded that the program-level of analysis conducted for the CPU, noise from stationary sources would be significant. As part of the Mitigation Framework, Mitigation Measure NOI-3 would be required for future development in order to reduce noise impacts to below a level of significance. Mitigation Measure NOI-3 requires that, prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, be prepared which identifies all noise- generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness are to be determined by the site-specific noise analyses.

In addition, the CPU EIR determined that any new construction in the CPU area would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Temporary noise impacts could have potentially significant impacts since some construction activities have the potential to generate noise in excess of 75 A-weighted decibel (dBA) equivalent continuous sound level (Leq). Therefore, the CPU EIR includes that Mitigation Measure NOI-4 be implemented for construction activities. Mitigation Measure NOI-4 requires projects that exceed daily construction noise thresholds established by the City of San Diego to include best construction management practices to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control; and that project applicants prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis and are to be specific to the location.

The MHPA Land Use Adjacency Guidelines in the MSCP Subarea Plan address noise impacts associated with industrial, commercial, mixed-use, or recreation uses that generate stationary noise adjacent to MHPA areas and are specifically detailed in Mitigation Framework LU-2 in Section 5.1 (Land Use) of the EIR. Additional construction-related noise measures are identified in Section 5.4, Biological Resources of the EIR. (See discussion above under Land Use and Biological resources.)

Proposed Project

A *Noise Study* was prepared for the Sunroad - Otay 50 project by Rincon Consultants (May 2017). That study is included as Appendix G to this Addendum.

The project site is located north of SR-905, south of Otay Mesa Road, east of La Media Road, and west of SR-125. La Media Road and SR-125 are identified as a truck activity road and SR-905 is identified as a truck route in the Otay Mesa Community Plan Mobility Element (2014). The most common source of noise in the project site vicinity is traffic on surrounding highways and roads. Motor vehicle noise, primarily from cars and trucks is of concern

because it is characterized by a high number of individual events, which often create sustained noise levels. Ambient noise levels would be expected to be highest during the daytime and rush hour unless congestion slows speeds substantially. There are no sensitive receptors on the project site or vicinity.

The project site is located in the Airport District of the Otay Mesa Community Plan. Due to airport operations, the eastern and western areas adjacent to the airport are suited for low occupancy uses, including but not limited to: warehousing, distribution, auto salvaging, and truck yards for cross-border movement of goods. Secondary off-site noise sources include overhead flight noise from Brown Field Municipal Airport, located approximately one mile west of the project site along Otay Mesa Road. The project site is located in the inner approach/departure zone (Safety Zone 2) of Brown Field Municipal Airport, which permits office, commercial, service, transportation, communication, utilities, industrial, manufacturing, and warehouse land uses (San Diego County, 2010). Based on the *Noise Technical Report* completed for the Otay Mesa Community Plan Update (2013), the project site is outside of the 60 dBA CNEL noise contour for Brown Field Municipal Airport.

Construction Noise

Construction of the project would generate a temporary increase in noise in the project area. Project construction would include site excavation and grading, building construction, paving and architectural coating of four buildings totaling 845,266 square feet, associated parking lot, and landscaping. There are no noise sensitive uses in the vicinity of the project site. Existing uses in the vicinity of the project site are light to heavy commercial and light to heavy industrial uses.

Acoustical calculations were performed to estimate noise levels generated during different phases of project construction at 200 feet and 650 feet from the project site. The two distances were chosen based on existing uses in the vicinity of the project site: light industrial uses exist on the north side of Otay Mesa Road 200 feet from the north edge of the project site where noise measurement 2 was collected, and light industrial uses exist on the south side of SR-905 directly south (650 feet) of the project site. The noise levels used in the analysis represent a conservative estimate of construction noise assuming the simultaneous use of construction equipment in the same construction staging location, closest to existing receptors. In practice, equipment would be dispersed temporally and spatially on the project site during construction activities.

Construction noise could be as high as 75 dBA Leq at the nearest adjacent property, which is a light industrial campus north of Otay Mesa Road. The City's construction noise threshold of 75 dBA Leq over a 12-hour period is only applicable to residential receptors. Therefore, construction noise would not exceed the City's construction noise level thresholds because there are no noise sensitive receptors (residences) located within a 0.25-mile radius of the project site. The project would be required to comply with the construction hour restrictions of Chapter 5, Section 59.5.0404 of the City of San Diego Municipal Code, which prohibits construction outside the hours of 7:00 morning (AM) and 7:00 afternoon (PM). The project would not result in significant noise impacts associated with construction. No mitigation measures would be required.

Operational Noise Impacts

Land uses surrounding the project site include light industrial buildings on the north and west. On-site operation noise would be significant only if exterior noise levels exceeded City's CEQA thresholds standards of 70 dBA CNEL for commercial and industrial uses. The 15-minute noise measurement taken at the comparable location (a light industrial campus located at Gailes Boulevard and St. Andrews Avenue 1.25 miles west of the project site) resulted in 60.5 dBA Leq. The comparable location was chosen due to the similarities to the proposed project in building configuration, landscape and hardscape composition, and location relative to SR-905 and Otay Mesa Road.

Therefore, on-site operational noise impacts for the project are anticipated to be similar to the comparable location. Assuming the proposed buildings would be in operation during daytime hours (7:00 PM to 7:00 PM), project-related hourly noise would equate to 60.5 dBA CNEL. Therefore, the project would not result in noise levels exceeding 70 dBA CNEL at adjacent commercial and industrial uses.

At 60.5 dBA Leq, the project would exceed exterior sound level limits for office uses (60 dBA CNEL), and not exceed exterior sound level limits for commercial and industrial uses (70 dBA CNEL). Operation of the site would be restricted to daytime hours, and ambient exterior noise from the project would be similar to the comparable location, which operates within the City's sound level limits. Comparable noise levels exceed exterior sound level limits for office uses by 0.5 dBA. However, there are no noise sensitive uses located in the immediate vicinity of the project site. Therefore, on-site operational noise impacts would be less than significant.

Land Use Compatibility

The proposed project does not include any noise-sensitive land uses on the project site. Exterior noise would be dominated by vehicular traffic along area roadways. Exterior noise compatibility thresholds are up to 60 dBA CNEL for office uses and 70 dBA CNEL for commercial and industrial uses. Noise measurements taken show an existing ambient noise level of 70 dBA Leq during peak traffic hours in the vicinity of the project site. The peak hourly Leq in an urban area with traffic is approximately two to four dBA lower than the daily CNEL value. Therefore, daily CNEL in the project site vicinity is likely 72 to 74 dBA CNEL. The project does not include outdoor activity areas; therefore, the project would not expose outdoor activity areas; to noise levels in excess of the exterior noise compatibility thresholds. Based on the City's General Plan Noise Element, the applicable interior noise compatibility threshold is 50 dBA CNEL for both commercial/industrial and office uses. Modern building construction typically provides noise attenuation from the exterior environment to the interior environment of 25 dBA. As such, proposed buildings would experience an interior noise level of at most 49 dBA CNEL (74 dBA CNEL minus 25 dBA of building attenuation). Therefore, the project would not be exposed to interior noise levels in excess of 50 dBA CNEL. Impacts would be less than significant. No mitigation measures would be required.

Traffic Noise Impacts

Primary noise sources in the vicinity of the project site originate from motor vehicle activities and traffic. The analysis of anticipated roadway noise impacts is based on the Transportation Impact Analysis for the project (Kimley Horn, February 2018). According to the City's CEQA threshold for traffic noise, if a project is currently at or exceeds the significance thresholds and noise levels would result in less than a 3 dBA CNEL increase, then the impact is not considered significant.

The project would generate a total of 4,225 daily trips with a total of 633 morning and 676 afternoon peak hour trips (Kimley Horn, February 2018). This is an approximate 1.5 percent increase from the estimated 282,184 existing peak hour and average daily traffic (ADT) volumes generated within the project site. Project traffic would increase along the segment of Otay Mesa Road between Piper Ranch Road and La Media Road. Nonetheless, traffic noise would increase by a maximum 1.1 dBA, which is below the City's allowable traffic noise increase threshold of 3 dBA.

There are no sensitive receptors in the vicinity of the project site. Therefore, the project would not expose residents or nearby sensitive receptors to noise levels in excess of City standards. Noise generated by the project would not substantially increase noise levels in the area. The proposed project would not result in significant noise impacts. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant noise impacts or a substantial increase in the severity of noise impacts from those described in the CPU EIR.

Paleontological Resources

CPU EIR

Paleontological resources were analyzed in Section 5.11 of the CPU EIR. The CPU EIR found that the CPU area contains geologic formations considered to be of high (San Diego Formation, Otay Formation) and moderate (Very Old Paralic Deposits) sensitivity for fossils. Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, the excavation or grading of geologic formations, which could contain fossil remains, would result in a potentially significant impact.

Although grading information for future development within the CPU area could not be determined at the time of the analysis for the EIR, a "worst case" scenario was approximated. The "worst case" condition includes permanent disturbance (development and/or grading) of the entire CPU area with the exception of CPU open space preserve acreage.

Implementation of the CPU has the potential to result in significant impacts to paleontological resources. Specifically, future projects implemented in accordance with the CPU that would involve substantial grading within the San Diego and Otay formations and Very Old Paralic Deposits would result in the potential loss of significant fossil remains. Accordingly, as part of the Mitigation Framework contained in the EIR, implementation of Mitigation Measure PALEO-1 is required for future projects in order to reduce impacts associated with paleontological resources to below a level of significance for future development projects. Mitigation Measure PALEO-1 requires that the potential for impacts to paleontological resources be based on review of the project applications and whether the project is underlaid by geologic formations where important paleontological resources could be encountered as a result of project grading. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

Proposed Project

As discussed in the CPU EIR, any projects within the CPU area must adhere to the Mitigation Framework for Paleontological Resources. This Mitigation Framework requires the City to determine the potential for impacts to paleontological resources prior to the approval of any development projects.

The project site is underlain by surficial soil deposits consisting of undocumented fill, topsoil, and Quaternary-age Very Old Paralic Deposits. Geologic formation exists at the site: Tertiary-age Otay Formation. Very Old Paralic Deposits have a moderate sensitivity for fossils while the Otay Formation has a high sensitivity for fossils. The project would result in 125,000 cubic yards of cut at a maximum depth of slopes of 11 feet and 125,000 cubic yards of fill at a maximum depth of slopes of eight feet. These grading quantities are above the thresholds for moderate and high sensitivity ratings. Therefore, impacts to paleontological resources would be significant. Paleontological monitoring would suffice to mitigate the impact to below a level of significant consistent with the mitigation set forth in the CPU EIR. Therefore, in accordance with the CPU EIR Mitigation Framework and specifically Mitigation Measure PALEO-1, with implementation of the project-specific MMRP, as detailed in Section VI, *Mitigation Monitoring and Reporting Program*, of this Addendum, potential paleontological resources impacts would be reduced to below a level of significance.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant paleontological resources impacts or is there a substantial increase in the severity of paleontological resource impacts from that described in the CPU EIR.

Transportation/Circulation

CPU EIR

The CPU EIR analyzed transportation/circulation impacts in Section 5.12. The CPU EIR presented that a total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impact at all of these 24 roadway segment locations. Additionally, a total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition. Therefore, the CPU would have a significant impact at all 49 of these intersections. Relative to freeway segments, with the planned and funded I-805 improvements, all I-805 freeway segments would be expected to operate at an acceptable LOS in the Horizon Year Plus CPU condition and, therefore, impacts would be less than significant. Five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition. Thus, the CPU impact at these five SR-905 freeway segments would be significant. 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. The CPU impact at these five freeway ramps would be significant.

The CPU TIA identified additional potential improvement measures for roadway segments that would be significantly affected due to buildout under the CPU; however, those improvements were not recommended as part of the CPU and, therefore, are not included in the CPU. The reasons for not recommending the improvements include various factors such as adjacency to environmentally sensitive land and/or steep hillsides, existing development conflicts, and/or multi-modal and urban design context. Thus, impacts to the roadway segments are considered significant and unmitigated. At the project-level, 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 subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

Similarly, even with future improvement to intersections that would be significantly affected with buildout of the CPU, some intersections would continue to be significantly impacted. The CPU TIA identified further potential improvement measures such as additional intersection turning movement lanes that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements include considerations such as adjacency to environmentally sensitive land, steep hillsides, routes to schools, and multi-modal and urban design context, or because additional study would be required in order to make additional recommendations as detailed in the Findings and Statement of Overriding Considerations adopted with certification of the CPU EIR. At the project-level, 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 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. Nonetheless, to reduce impacts of the CPU relative to Transportation and Circulation, the CPU EIR requires that Mitigation Framework measure TRF-1 be implemented. Mitigation Measure TRF-1 requires that intersections be improved per the intersection lane designations identified in Figures 5.12-4a-g of the CPU EIR (See Section VI of this Addendum).

Proposed Project

The CPU EIR noted that specific development projects included within the CPU would be subject to additional traffic analysis prior to final approval. Therefore, a *Transportation Impact Analysis* was prepared for the project by Kimley Horn (February 2018) and can be found in Appendix H of this Addendum. The TIA evaluates the potential off-site traffic impacts associated with the proposed project.

The total trip generation for the warehouse project is expected to be approximately 4,225 daily trips with 634 morning peak-hour trips (444 in, 190 out) and 676 afternoon peak-hour trips (270 in, 406 out), using a rate of five daily trips per thousand square feet (ksf). The project traffic distribution was derived using Series 12 Select Zone Regional Models prepared by SANDAG as a base, with adjustments made to account for network discrepancies between assumptions in the model and in this study. Model runs were prepared for Year 2020 and Year 2050 to account for changes in the regional network between Near Term and Horizon Year conditions.

Nine scenarios were analyzed as part of this analysis, listed below:

- Existing Conditions
- Existing Conditions Plus Phase 1
- Existing Conditions Plus Phase 1 & 2
- Near Term (2018) Baseline Conditions
- Near Term (2018) Plus Phase 1
- Near Term (2020) Baseline Conditions
- Near Term (2020) Plus Phase 1 & 2
- Horizon Year (2035) Baseline Conditions
- Horizon Year (2035) Plus Phase 1 & 2

A total of 16 existing intersections, 15 roadway segments, and four freeway segments were included as part of the study area. Freeway ramp metering analysis for the SR-905 ramps at La Media Road was also included in the analyses.

<u>Intersections</u>

The proposed project is consistent with the Otay Mesa CPU. The project site is zoned IL-3-1 and designated in the Otay Mesa CPU as Heavy Commercial and the proposed use is an allowable warehouse use within that designation. The Otay Mesa CPU assumed Year 2062 as build-out of the Community Plan when estimating traffic volumes. The Horizon Year in this study is assumed as Year 2035 and factored the Horizon Year volumes accordingly. Based on the City's current guidelines, there would be a significant cumulative project traffic impact at the following intersections under the Horizon Year 2035 scenario:

- Harvest Road & Otay Mesa Road (2.78 percent fair-share contribution)
- La Media Road & Otay Mesa Road (10.90 percent fair-share contribution)
- Cactus Road & Otay Mesa Road (4.14 percent fair-share contribution)
- Heritage Road & Otay Mesa Road (2.64 percent fair-share contribution)
- Caliente Avenue/Ocean View Hills Parkway & Otay Mesa Road (2.45 percent fair-share contribution)

The proposed project would result in direct impacts to the intersection of Otay Mesa Road and La Media Road, which is identified as one of the intersections where significant impacts would result from buildout under the CPU,

in Phase 1 and Phase 2 of the project. Thus, the project would not result in any new impacts associated with Traffic/Transportation. The project would be required to implement Mitigation Measure TR-1 included in the CPU EIR. Project-specific mitigation, detailed in Section VI*, Mitigation Monitoring and Reporting Program*, of this Addendum would reduce the project's impacts to below a level of significance.

Street Segments

The proposed project would not result in significant direct or cumulative traffic impacts at the study area roadway segments.

Freeway Segments and Metered On-Ramps

Similarly, there would be no significant cumulative traffic impacts to the freeway segments under the Horizon Year 2035 scenario. Thus, the project would not result in any new impacts associated with Traffic/Transportation.

Site Access and Circulation

The two access locations for the proposed project site would be the currently signalized intersection of Otay Mesa Road and Piper Ranch Road and a right-in/right-out only access on Otay Mesa Road at the location of planned Avenida Costa Azul. The proposed project would construct both access points and modify the existing raised median along Otay Mesa Road to accommodate access to the site at Piper Ranch Road. The right-in/right-out access would be constructed in a manner to operate independently, but designed to allow the adjacent property to the west to build additional width onto the access to ultimately accommodate both developments.

Driveway access to Buildings 3 and 4 personal vehicle parking and truck bays would be provided through an east-west drive aisle located approximately 410 feet south of Piper Ranch Road at Otay Mesa Road and an access road at the southern boundary of the project site. Access to Building 1 personal vehicle parking would be provided through a driveway located approximately 450 feet south of the right-in/right-out only shared-access project driveway. Access to Building 2 personal vehicle parking lot would be provided through a driveway located approximately 450 feet south of Piper Ranch Road at Otay Mesa Road. The access road at the southern boundary of the site provides access to the truck bays for Buildings 1 and 2. The site configuration allows vehicles to maneuver off Otay Mesa Road without impacting access to the site and also provide spaces for vehicles to queue at the signalized intersection of Piper Ranch Road and Otay Mesa Road without impacting access to the buildings.

The on-site circulation and parking aisles configuration adequately serve the project's proposed uses. Most parking aisles have access on both ends, which allows for continuous circulation. Where parking drive aisles must terminate without a secondary access, turnaround areas are provided.

Pedestrian Facilities

The project would construct new non-contiguous sidewalk facilities along its frontage on Otay Mesa Road per City of San Diego development requirements. A pedestrian crossing to cross Otay Mesa Road at the intersection of Piper Ranch Road and Otay Mesa Road would be included in the traffic signal modification required for the project. Currently, a pedestrian crossing is allowed, but there are no marked crosswalks and no sidewalk or curb ramps on the south side of Otay Mesa Road. This crossing would assist in connecting the project site to the bus stop on the north side of Otay Mesa Road. With the project improvements, pedestrian facilities would also be provided between the buildings on-site.

Bicycle Facilities

Otay Mesa Road is a planned Class II bicycle facility as designated in the Otay Mesa CPU. As part of the proposed project's frontage improvements that include widening of Otay Mesa Road on the south side, the roadway design would provide a Class II bicycle facility with a buffered bicycle lane (three-foot buffer, seven-foot bike lane). Implementation of a Class II bicycle lane along the project frontage would be an isolated bicycle facility in the interim until other bicycle connections are implemented along Otay Mesa Road and other roadways in the community as identified in the Otay Mesa CPU. It is expected that bicycle use would be limited for users of the site until these additional facilities are provided. However, the proposed project would provide connections to the site that would encourage non-vehicle travel in the future. This is important to support Climate Action Plan goals and other efforts to reduce vehicle traffic in the City of San Diego. Further, the proposed project would be consistent with the Otay Mesa CPU's bicycle network.

Access to Transit

The project site is currently served by the Metropolitan Transit Service (MTS) Route 905 on weekdays. On weekends, Route 905 does not travel adjacent to the site. Route 905 connects the Iris Avenue Transit Station in the west with the Otay Mesa Border Crossing in the east. Route 905 operates from approximately 5:00 AM to 9:30 PM with 20 minute headways.

There is an existing bus stop at the northwest corner of Otay Mesa Road and Piper Ranch Road for Route 905 that could be utilized by the proposed project site. Two new bus stops on Otay Mesa Road would be incorporated into the project site design. One stop would be east of the right-in/ right-out only driveway (Avenida Costa Azul), and the other stop would be just east of Piper Ranch Road. Access to the site from these new bus stops serving eastbound bus routes would be provided by a non-contiguous sidewalk connection along the project frontage and on-site connections to the buildings. A pedestrian crossing with pedestrian ramps at the signalized intersection of Otay Mesa Road and Piper Ranch Road is provided for pedestrians to access westbound bus routes.
The 2050 Regional Transportation Plan, prepared by the SANDAG, includes the addition of Rapid Bus Service (Route 638) that would connect the San Ysidro Community in the west with the Otay Mesa Community in the east via Otay Mesa Road, Airway Road, and the SR-905 Corridor as part of the Revenue Constrained Plan estimated to be implemented by Year 2035. This would provide additional bus connections for the proposed project.

Parking

Per Section 142.0527 of the City of SDMC, the proposed project is required to provide one parking space per every 1,000 square feet of gross leasable area. For Phase 1 of the project, the minimum parking requirement would be 370 parking spaces. The proposed site plan includes 418 parking spaces for Phase 1. For Phase 2 of the project, minimum parking requirement would be 482 parking spaces. The proposed site plan includes an additional 470 parking spaces added as part of Phase 2. The total minimum parking requirement for the project site is 846 parking spaces and a total of 894 spaces are proposed (which would be available to both phases of the project). In addition, the project provides 143 parking spaces for truck trailers.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would result in significant impacts to intersections identified in the CPU EIR and project-specific mitigation would be required to reduce the projects impacts in accordance with the CPU Mitigation Framework. The project would not result in any new significant impacts or a substantial increase in the severity of impacts from that described in the CPU EIR.

Public Services

CPU EIR

The CPU EIR analyzed impacts to public services in Section 5.13. Public services are those functions that serve residents on a communitywide basis. The CPU EIR found that buildout of the proposed CPU would increase demand for all public services—including fire and police protection, schools, parks and recreation, and libraries—which would in turn result in the need for new public facilities. The construction and operation of these facilities would occur within the footprint of the CPU area (although a future library site has not yet been identified). These facilities would be subject to numerous development regulations within the City, including policies within the General Plan and CPU and subject to environmental review as design plans are available. The individual school districts are responsible for planning, siting, building, and operating schools in their responsible districts within the CPU area. Impacts to public service would be less than significant. No mitigation measures are required.

Proposed Project

The project proposes the construction of four building totaling 845,266 square feet of light industrial, office, and commercial uses. The project site is located in an urbanized area where fire and police protection services are already provided. The project would not adversely affect existing levels of fire or police protection services to the area and would not require the construction of new or expanded governmental facilities. The project does not involve the provision of housing or an increase in student or general population. The project, therefore, would not result in the need for new or expanded school or park facilities. The project site is located in an urbanized area where City services are already provided. The project would not adversely affect existing levels of facilities to the area, and would not require the construction of new or expanded governmental facilities. Impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant public services impacts or a substantial increase in the severity of public services impacts from that described in the CPU EIR.

Utilities

CPU EIR

The EIR evaluated impacts to utilities in Section 5.14. Utility services that were addressed include water, wastewater, reclaimed water, solid waste, storm water drainage, and communication systems.

<u>Water, Sewer, and Reclaimed Water</u>

Improvement to water and recycled water systems were previously identified in master planning documents and would be required whether or not the CPU were to be implemented. However, additional wastewater system improvements beyond what was identified in master planning documents would be necessitated by CPU implementation. These improvements include, an increase in emergency storage at sewer pump station 23T to 0.50 million gallons, upsize 20-inch to 24-inch gravity main along Otay Mesa Road from force main to existing 42-inch gravity main, and upsize 24-inch to 30-inch gravity main from existing 42-inch gravity main to existing 24-inch San Ysidro Trunk Sewer. The need for these improvements would not result in significant impacts, because the

2004 Otay Mesa Trunk Sewer Master Plan and 2009 Refinement Report previously identified these improvements as required in future phases to accommodate buildout wastewater generation from the area. The three additional improvements identified in the CPU would occur within existing utility line easements and facilities and would not result in significant impacts to the environment. Therefore, impacts associated with water, reclaimed water, and wastewater systems were considered less than significant at the program-level.

Solid Waste

The CPU was found to not result in the direct need to a new landfill. Compliance with the Storage, Recycling, and Construction & Demolition ordinances and the requirement to prepare a Waste Management Plan (WMP) (in some instances) would contribute to the CPU meeting the State-mandated 75 percent diversion rate. However, because all future projects within the CPU area may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, the CPU cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Cumulative impacts associated with solid waste were found to be significant at the program-level. Mitigation measure UTL-1, which requires any subsequent project that would generate 60 tons or more of solid water to prepare a WMP, is implemented to reduce impacts to below a level or significance.

Storm Water Infrastructure

No storm drains, or other community-wide drainage facilities were 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. As such, future projects implemented in accordance with the CPU would be sited and designed to minimize impacts on receiving waters; in particular, the discharge of identified pollutants to an already impaired water body. This would be accomplished through compliance with existing regulatory requirements contained in the City's Storm Water Runoff and Drainage Regulations of the SDMC. At the project-level, adherence to existing storm water regulation, conformance with General Plan and CPU policies, and review under CEQA was found to assure that impacts associated with the requirement for and/or construction of storm water infrastructure would be less than significant at the program-level. No mitigation measures are required.

Communications Systems

The CPU did not require new communication systems to be built; however, there would be the need to extend the existing systems to individual project sites. No significant impact was anticipated as a result of undergrounding these utility lines. No mitigation measures are required.

Proposed Project

Water

The proposed project is not anticipated to have a detrimental impact on existing water supply. The project site is served by existing water service from the City, and adequate services are available to serve the project. The project proposes warehouse uses that would not require the need for water supply in excess of existing regulations. The current water supply system is able to serve the proposed project The proposed project would not require expanded or new facilities to be construed, and therefore, no impacts would result from project implementation. No mitigation measures would be required.

Sewer

A *Sewer Study* was prepared for the project by Kimley Horn (December 2017) and can be found in Appendix I of this Addendum. The project is estimated to yield a maximum of 24 Equivalent Dwelling Units (EDU) at full buildout. This EDU count is far less than the allowable sewer generation for industrially-zoned land, but in-line with the expected sewer demand of similar projects. The project flows to City of San Diego sewer pump station 23T, which has available capacity for the project. Implementation of the project would not interrupt existing sewer service to the site or other surrounding uses. The increased flow from the project would not have an effect on the capacity of the existing sewer main. No significant increase in demand for wastewater disposal or treatment would be created by the project. Also, the project would not require construction of wastewater treatment facilities. The proposed project would not result in significant impacts to sewer facilities. No mitigation measures would be required.

Reclaimed Water

The project is not proposing use of reclaimed water as reclaimed water is not available through the waster provider (Otay Water District). The project does not require the use of reclaimed water.

According to the Otay Mesa CPU Program EIR, the City currently has no specific plans to provide recycled water service to the CPU area. Because the City has no current plans to expand their distribution system in this area, recycled water service to the western side of the CPU area would likely require expansion of the OWD's recycled water system; however, the CPU Program EIR states that no expansion is required or necessitated in conjunction with adoption of the CPU. An agreement between the OWD and the City would have to be negotiated to provide this service.

Solid Waste

Per the requirements of the CPU EIR, a WMP was prepared by KLR Planning (March 2018) to provide an analysis of the solid waste impacts anticipated for the proposed project (Appendix L). The project would be required to adhere to City ordinances, including the *Construction and Demolition Debris Diversion Deposit Program*, the City's *Recycling Ordinance*, and the *Refuse and Recyclable Materials Storages Regulations*. The WMP for the Sunroad - Otay 50 project is designed to implement and adhere to all City ordinances and regulations with regards to waste management. The measures in the WMP would ensure that impacts are mitigated to below a level of significance. The WMP consists of two section corresponding to the implementation of site development: the Construction Phase and the Occupancy Phase. Construction of the project is expected to occur over a period of 18 months and produce an estimated 1,690.42 tons of waste. Of this waste generated during construction, 89 percent are expected to be diverted from landfills. During the occupancy the expected generated waste per year from the proposed project when fully occupied would be approximately 3,549,2 1 tons The project would be required to provide a minimum of 1,632 square feet of each refuse storage area and recyclable material storage area.

The project has been designed to achieve 75 percent of construction waste to be source-reduced and/or recycled. While diversion activities during occupancy would achieve only 40 percent diversion and would not achieve the State target of 75 percent, the project incorporates several measures above and beyond the requirements of local ordinance.

- First, the project exceeds ordinance requirements and the State waste reduction target and targets 20 percent recycle content of construction materials and 75 percent for landfill diversion.

- Second, the project includes landscaping that would reduce yard waste and would provide transportation to a composting facility for the yard waste that is produced. Prior to issuance of building permits, the Environmental Services Department (ESD) would review the landscaping plans and hauling contract for the facility to verify that waste reduction goals are met.
- Third, the project includes project features on-site that will help to achieve the broad goals of smart growth and sustainable development. Specifically, the project has demonstrated compliance with the City's Climate Action Plan (CAP) through implementation of measures as presented in the CAP Consistency Checklist Application prepared for the project, including sustainable design features. The project complies with the Uniform Building Code (UBC) and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy. The project proposes to utilize planters/bioswales throughout the project for Low Impact Development (LID) storm water treatment.

These measures ensure that the waste generated by the project would be properly managed and that solid waste services would not be impacted. The project would also implement standard measures to avoid cumulative impacts on solid waste. Impacts would be less than significant.

Storm Water Infrastructure

The project would not exceed the capacity of the existing storm water drainage system. Bioretention and underground detention structures are proposed to meet current storm water requirements.

The project proposes three biofiltration basins located on the west and southwest extents of the project site and four biofiltration basins located between Buildings 1 and 2. The project is proposed to drain from the northeast corner to the southwest corner of the project site. The building pads would be graded with a half percent slope while the driveways and parking lots would be graded to carry water flows to the south and west to the biofiltration basins. Portions of Buildings 1 and 2 would convey runoff into biofiltration areas in the center of the parking area between the buildings before continuing to the southern biofiltration basin. The southern half of Otay Mesa Road running next to the project would drain into curb inlets which would be conveyed to the western biofiltration basins along with a portion of Building 1 and eventually confluencing with the flow entering the southern basin, all of which would enter an existing drainage structure located by the SR 905 off-ramp for LA Media Road.

To comply with current storm water regulations, BMPs would be implemented. These include prevention of illicit discharges into the MS4, storm drain stenciling or signage, protection of outdoor materials storage areas, materials stored outdoors, and trash storage area from rainfall, run-on, runoff and wind dispersal, and on-site storm drain inlets. Project review by qualified City staff determined that the project would not exceed the capacity of the existing system. Impacts would be less than significant. No mitigation measures would be required.

Communications Systems

The project site is located in an urbanized area of the City where communication services are already provided. The project would not adversely affect existing levels of communication system facilities to the area and would not require the construction of new or expanded governmental facilities. Impacts to communication systems would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant impacts to utilities or a substantial increase in the severity of impacts to utilities from that described in the CPU EIR.

Water Supply

CPU EIR

The CPU EIR evaluated impacts to water supply in Section 5.15. The CPU area is serviced by two providers: the City's Public Utilities Department and the Otay Water District. The CPU EIR found that there is sufficient water supply to serve the projected demands of the CPU and future water demands within the service areas of both providers in normal and dry year forecasts during 20-year projection. Impacts would be less than significant. No mitigation measures are required.

The CPU EIR also states that all future development must conform with 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. Impacts would therefore be less than significant. No mitigation measures are required.

Proposed Project

The proposed project would not affect the ability of the water-serving agencies to provide water. The project proposes warehouse uses that would not require the need for water supply in excess of existing regulations. The current water supply system is able to serve the proposed project. The proposed project is consistent with the findings of the CPU EIR. The proposed project would confirm with existing regulations, as well as the General Plan and CPU. Impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant impacts to water supply or a substantial increase in the severity of impacts to water supply from that described in the CPU EIR.

Population and Housing

CPU EIR

The CPU EIR evaluated population and housing impacts in Section 5.16. The CPU EIR found that the projected population growth from implementation of the CPU, as estimated by SANDAG, would be primarily accommodated in multi-family dwelling units rather than single-family housing, thus substantially increasing the intensity of residential development within the CPU area. While this growth is considered substantial, the CPU would:

- Implement SANDAG's 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.

- Focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the RCP and General Plan goals and policies.

As such, the CPU provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist; therefore, impacts would be less than significant. No mitigation measures are required.

Proposed Project

As discussed in section 5.16.3 of the CPU EIR, all growth within the CPU area would comply with SANDAG's RCP and Regional Housing Element and the City's General Plan and Housing Element. The proposed project would not induce substantial population growth in the area. The project proposes the construction of four buildings totaling 845,266 square feet of light industrial, office and commercial uses consistent with the land use designation of heavy commercial and current zoning of IL-3. No housing would be constructed as a result of the project. As such, impacts would not be considered substantially growth-inducing either directly or indirectly, and impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant population and housing impacts to or a substantial increase in the severity of population and housing impacts from that described in the CPU EIR.

Agriculture and Mineral Resources

CPU EIR

The CPU EIR evaluated impacts to agriculture and mineral resources in Section 5.17. The CPU EIR found that buildout of the CPU would eventually eliminate all agricultural activity that occurs within the CPU area. This includes the 306 acres of active farmland located in the area between Spring Canyon and La Media Road. It should be noted that, as described in Section 3.5 of the CPU EIR, the Central Village is rezoned to an agricultural zone under the CPU. 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. Rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts have contributed to a significant reduction in future agricultural viability within the CPU area. Furthermore, 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 rezoned the Central Village to an agricultural "holding" zone to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to non- agricultural uses would be less than significant. No mitigation measures are required.

The entire CPU area is classified as either Mineral Resource Zone (MRZ)-2 lands of "identified mineral resource significance" or MRZ-3 "containing mineral deposits that have not been adequately tested to determine the significance of the materials present". Portions of the CPU area where Mineral MRZ-2 aggregate resource areas exist are currently developed are 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 mineral 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. No mining activities are currently present within the CPU area and development would not have any indirect impacts to extraction operations in the vicinity. 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. No mitigation measures are required.

Proposed Project

The project site does not contain prime farmland, unique farmland, or farmland of Statewide Importance as designated by the California Department of Conservation. Agricultural land is not present on the project site or in the general vicinity. No Williamson Act Contracts or properties exist on or within the vicinity of the project site. In addition, the project site is currently not zoned for agricultural use and would not affect any properties zoned for agricultural use or affected by a Williamson Act Contract, as there are none within the project vicinity. Active agricultural land is not present on the project site or in the general vicinity of the site. No impacts would result. No mitigation measures would be required.

The project site lies in a Mineral Resource Zone that has been found to contain minerals (MRZ-3) 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. Impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant agricultural and mineral resources impacts to or a substantial increase in the severity of agricultural and mineral resources impacts from that described in the CPU EIR.

Greenhouse Gas Emissions

CPU EIR

The CPU EIR analyzed impacts associated with greenhouse gas emissions in Section 5.18. The CPU contains policies that were found to reduce greenhouse gas (GHG) emissions from transportation and operational building uses (related to water and energy consumption, and solid waste generation, etc.) 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. However, because project-level details were not known at the time of CPU EIR analysis, there is the potential that future projects would not meet the necessary City reduction goals put in place in order to achieve the reductions required by Assembly Bill (AB) 32. Thus, the level of potential cumulative impacts associated with applicable plan conflict would be significant. Mitigation measure GHG-1 requiring future project implemented in accordance with the CPU incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to business as usual (BAU), to meet AB 32-year 2020 target levels, was implemented to reduce impacts to below a level of significance.

The CPU EIR found that the CPU's reductions in emissions relative to business as usual fell short of meetings the City's goal or a minimum 28.3 percent reduction and therefore, impacts associated with GHG emissions under the CPU would be cumulatively significant and unavoidable. Mitigation measure GHG-2 was implemented to reduce impacts from GHG emissions to below a level of significance. This measure required future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation measure GHG-1. These impacts remain significant and unmitigated.

Proposed Project

Subsequent to the CPU adoption in December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. In July 2016, the City adopted the CAP Consistency Checklist (Checklist) to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development. Compliance with the checklist supersedes the CPU EIR GHG mitigation measures.

A CAP Consistency Checklist (March 2019) was prepared for the proposed project by Sunroad Otay Partners, L.P. and can be found as Appendix I to this Addendum.
Under Step 1 of the CAP Consistency Checklist, the project is consistent with the existing General Plan and Otay Mesa Community Plan land use designations and zoning on the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Consistency Checklist demonstrates that the project would be consistent with the applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. These project features would be assured as a condition of project approval. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or rezone.

The proposed project has been found to be consistent with the Checklist and no significant impacts from GHG emissions would occur. Compliance with the CAP Checklist is assured through a condition of approval of the permit. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that implementation of the project would require a major change to the Otay Mesa CPU EIR. The project would not result in any new significant GHG impacts or a substantial increase in the severity of GHG impacts from those described in the CPU EIR would result.

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

The Sunroad – Otay 50 project shall be required to comply with all mitigation measures outlined within the Mitigation, Monitoring and Reporting Program of the previously certified EIR 30330/304032/SCH No. 2004651076 and associated project-specific measures required by the EIR based on subsequent technical studies prepared for the project in accordance with the EIR. The following MMRP identifies measures which specifically apply to this project.

The Sunroad – Otay 50 project shall be required to comply with all mitigation measures outlined within the Mitigation, Monitoring and Reporting Program of the previously certified EIR 30330/304032/SCH No. 2004651076 and associated project-specific measures required by the EIR based on subsequent technical studies prepared for the project in accordance with the EIR. The following MMRP identifies measures which specifically apply to this project.

Air Quality

CPU EIR Mitigation Measures

Construction Emissions

AQ-1: *For projects that would exceed daily construction thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:*

a. Minimizing simultaneous operation of multiple pieces of construction equipment;
b. Use of more efficient, or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;
c. Use of alternative fueled construction equipment;
d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and
e. Minimizing idling time by construction vehicles.

Mitigation Measure AQ-1 is further expanded to include the following project- specific mitigation measure:

f. Low-Volatile Organic Compounds (VOC) architectural coatings should be used for all buildings. In addition, no more than 85 gallons of paint should be used per day for architectural coatings, including both interior and exterior surfaces.

Biological Resources

CPU EIR Mitigation Measures

Sensitive Plants and Animals

BIO-1: *To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the CPU area, all subsequent projects implemented in accordance with the CPU shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within CPU area, focused presence/absence surveys shall be conducted in accordance with the biology guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.*

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of Burrowing Owls on the project site. Future projects shall be required 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 in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). 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.

Mitigation for Impacts to Sensitive Upland Habitats
Future projects implemented in accordance with the CPU resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines (Table 5.4-7) MSCP Subarea Plan. Future project- level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, oak woodlands, coastal sage scrub, and consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines.

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project- level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012a). These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

If mobility element roads (i.e., Beyer Boulevard, Airway Road, and Del Sol Boulevard) impact existing conserved lands, an additional 1:1 ratio shall be added to the City required mitigation ratio in order to replace the lands that were previously preserved as open space. Mitigation lands purchased to compensate for impacts to areas within conserved lands shall be located in the Otay Mesa area if feasible.

Migratory Wildlife

BIO-2: *Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the CPU area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in BIO-1 during the discretionary review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.*

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting or foraging activities shall be addressed in the Biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species specific mitigation plans (such as a Burrowing Owl Mitigation Plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, State Fish and Game Code, and/or the ESL Regulations.

Sensitive Habitat

BIO-3*: Please refer to Mitigation Framework BIO-1.*

In accordance with **BIO-1** and **BIO-2**, the following project-specific mitigation measures shall be implemented.

BIO-1/BIO-2a. *Biological Resource Protection During Construction Including General Avian Protection*

I. Prior to Construction

A. Biologist Verification: The owner/permittee shall provide a letter to the City's MMC Section stating that Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. Pre-construction Meeting: The Qualified Biologist shall attend a pre- construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. Biological Documents: The Qualified Biologist shall submit all required documentation to Mitigation Monitoring Coordination verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts; and/or other local, State or Federal requirements.

D. Biological Construction Mitigation/Monitoring Exhibit: The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the biological documents in C, above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements, avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director/MMC. The Biological Construction Mitigation/Monitoring Exhibit shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by MMC and referenced in the construction documents.

E. Resource Delineation: Prior to construction activities, the Qualified Biologist shall supervise the placement of silt and orange construction fencing or equivalent along the limits of disturbance and verify compliance with any other project conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This phase shall include, as applicable, flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction.

Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

F Education: Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian buffers and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. Monitoring: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the Biological Construction Mitigation/Monitoring Exhibit. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre- construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to Mitigation Monitoring Coordination on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

The Qualified Biologist shall monitor, as is feasible, for the presence of sensitive animal species and shall, if practicable, direct or move these animals out of harm's way (i.e., to a location of suitable habitat outside the impact footprint).

B. Subsequent Resource Identification: The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, State or Federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction

In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL Ordinance and MSCP, CEQA, and other applicable local, State and Federal laws. The Qualified Biologist shall submit a final Biological Construction Mitigation/Monitoring Exhibit /report to the satisfaction of the City Assistant Deputy Director /MMC within 30 days of construction completion.

Direct Impacts to Upland Vegetation

- Mitigation for impacts to 47.0 acres of burrowing owl-occupied non-native grassland from the project shall occur at a ratio of 0.5:1. To, in part, satisfy the required 23.5 acres of non-native grassland mitigation, the 18.75-acre (net) Turecek parcel is proposed to be preserved and enhanced for the burrowing owl. Results of initial site monitoring would be monitored, and the applicant would provide interim management and annual reporting for three years with the goal of establishing and maintaining 75 percent cover by vegetation dominated by low growing plan species to support ground squirrel and burrowing owl. Long-term management of the site would commence following completion of the Initial Tasks and a three-year interim monitoring and reporting period.

Prior to the issuance of the Grading Permit, the following would be required:

1. Evidence of completion of the initial tasks of the RMP to the satisfaction of the City and Wildlife Agencies, including fencing/access control, trash/debris removal, mowing, dethatching, weed removal, berm placement, and brush pile placement.
2. Recordation of a covenant of easement or conservation easement over the 18.75-acre off-site burrowing owl mitigation property (Turecek Parcel).
3. Preparation of a PAR based on the list of management tasks in Table 2 of the RMP and approval by the City and Wildlife Agencies.
4. Acquisition of Credits in the Ramona Grasslands Preserve. The remaining required 4.75 acres of non-native grassland mitigation would be satisfied through acquisition of non-native grassland credits from the Ramona Grasslands Preserve in San Diego County. Evidence of credits purchase is required prior to issuance of the grading permit.

Direct Impacts to San Diego Black-tailed Jackrabbit, Raptor Foraging, and California Horned Lark

Direct impacts to San Diego black-tailed jackrabbit, raptor foraging, and California horned lark non-native grassland habitat from the project shall be mitigated by implementation of Mitigation for Direct Impacts to Upland Vegetation (1-4) as listed in the prior section.

Impacts to Burrowing Owl Occupied Habitat

Mitigation proposed for impacts to non-native grassland from the project considered occupied by the burrowing owl shall be mitigated through implementation of Mitigation for Direct Impacts to Upland Vegetation as listed (1-4) above, and through enhancement, preservation, and management of the Turecek parcel as described in the Resource Management Plan for the Turecek Off-Site Mitigation Parcel for the Sunroad Otay Project.

1. Prior to the issuance of the Certificate of Occupancy, the following would be required to ensure adequate long-term management:

   Enhancement of the 18.75-acre Turacek parcel must be approved by MMC, MSCP and the Wildlife Agencies. Additionally, prior to final sign off of the enhancement of the 18.75-acre Turacek parcel, the owner/permittee shall identify a Qualified Long-Term Habitat Resource Manager subject to County or City, and Wildlife Agency approval. If long-term management responsibilities are not transferred to a qualified entity, the owner/permittee shall remain responsible to maintain the Turecek Off-Site Mitigation Parcel in a burrowing owl habitat appropriate condition to avoid regression into a non-suitable burrowing owl habitat condition until responsibility is transferred to and/or accepted by the qualified Habitat Resource Manager.

Potential Direct Impacts to Individual Burrowing Owls or Burrowing Owl Burrows

Mitigation for potential direct impacts to Individual Burrowing Owls or Burrowing Owl Burrows shall occur through the following:

Preconstruction Survey Element

Prior to Permit or Notice to Proceed Issuance:

1. As this project site has been determined to be burrowing owl occupied or to have burrowing owl occupation potential, the Permit Holder shall submit evidence to the Assistant Deputy Director of Entitlements (or designated designee) verifying that a Biologist possessing qualifications pursuant "Staff Report on Burrowing Owl Mitigation" (State of California Natural Resources Agency Department of Fish and Game, March 7, 2012) (hereafter referred as CDFG 2012, Staff Report), has been retained to implement a burrowing owl construction impact avoidance program.

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

Prior to Start of Construction:

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

2. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report - Appendix D. (Please note, in 2013, CDFG became California Department of Fish and Wildlife.)

3. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of pre-construction/take avoidance surveys. Verification shall be provided to the City's Mitigation Monitoring and Coordination (MMC) Section. If results of the pre-construction surveys have changed and burrowing owl are present in areas not previously identified, immediate notification to the City and WAs shall be provided prior to ground disturbing activities.

During Construction:

1. Best Management Practices shall be employed as burrowing owls are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally-permitted active construction projects which are burrowing owl occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied burrowing owl areas, should undertake measures to discourage burrowing owls from re-colonizing

previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.

2. On-going burrowing owl Detection - If burrowing owls or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If burrowing owls or burrows are detected during the pre-construction surveys, Section "B" shall be followed. Neither the MSCP Subarea Plan nor this mitigation section allows for any burrowing owls to be injured or killed outside or within the MHPA. In addition, impacts to burrowing owls within the MHPA must be avoided.

A. Post Survey Follow-Up if burrowing owl and/or Signs of Active Natural or Artificial Burrows are Not Detected During the Initial Pre-Construction Survey
Monitoring the site for new burrows is required using Appendix D protocol for the period following the initial pre-construction survey until construction is scheduled to be complete and is complete. (NOTE - Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol).

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

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

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

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

B. Post Survey Follow-Up if burrowing owls and/or Active Natural or Artificial Burrows are detected during the Initial Pre-Construction Survey

Monitoring the site for new burrows is required using Appendix D of the CDFG 2012, Staff Report for the period following the initial pre-construction survey until construction is scheduled to be complete and is complete. (NOTE - Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule which adheres to the required number of surveys in the detection protocol.)

1) This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – all direct and indirect impacts to burrowing owls within the MHPA SHALL be avoided.

2) If one or more burrowing owls are using any burrows (including pipes, culverts, debris piles etc.) on or within 300 feet of the proposed construction area, the City's MMC Section shall be contacted. The City's MMC Section shall contact the WAs regarding eviction/ collapsing burrows and shall enlist appropriate City biologist for on-going coordination with the WAs and the Qualified burrowing owl Biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the WAs. This distance may increase or decrease, depending on the burrow's location in relation to the Site's topography and other physical and biological characteristics.

   a) Outside the Breeding Season - If the burrowing owl is using a burrow on site outside the breeding season (i.e., September 1 – January 31), the burrowing owl may be evicted after the qualified burrowing owl biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow and written concurrence from the WAs for eviction is obtained prior to implementation.

   b) During Breeding Season - If a burrowing owl is using a burrow on-site during the breeding season (February 1– August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the burrowing owls can be evicted. Eviction requires written concurrence from the WAs prior to implementation.

3) Survey Reporting During Construction - Details of construction surveys and evictions (if applicable) carried out shall be immediately (within five working days or sooner) reported to the City's MMC Section and the WAs and must be provided in writing (as by e-mail) and acknowledged to have been received by the required agencies and Development Services Department Staff member(s).

Post Construction:

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

Historical Resources

CPU EIR Mitigation Measures

Archaeological Resources

HIST-1: *Prior to issuance of any permit for a future development project implemented in accordance with the CPU area that could directly affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.*

INITIAL DETERMINATION
The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

STEP 1:
Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist.

STEP 2:
Once a historical resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

STEP 3:
Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. These provisions are outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

STEP 4:
Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

STEP 5:
For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

In accordance with **HIST-1**, the following project-specific mitigation measures shall be implemented.

HIST-1a: *Unanticipated Discovery of Cultural Resources*

If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the discovery proves to be significant under NHPA, additional work such as data recovery excavation may be warranted.

HIST-1b: *Unanticipated Discovery of Human Remains*

If human remains are found, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In accordance with this code, in the event of an unanticipated discovery of human remains, the San Diego County Coroner would be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD would complete the inspection of the APE within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Paleontological Resources

CPU EIR Mitigation Measures

PALEO-1*: Prior to the approval of subsequent development projects implemented in accordance with the CPU, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted under CPIOZ TYPE B, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project-level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review.*

I. Prior to Project Approval

A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- *Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.*
- *Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.*
- *Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.*

B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

- *Monitoring is always required when grading on a fossil recovery site or a known fossil location.*

- *Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).*
- *Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.*
- *Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological MMRP shall be implemented during construction grading activities.*

In accordance with mitigation measure **PALEO-1**, the project would also implement the following project-specific measures to reduce impacts to paleontological resources to below a level of significance.

PALEO-1a:

I. Prior to Permit Issuance
   A. Entitlements Plan Check
      1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.
   B. Letters of Qualification have been submitted to ADD
      1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
      2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
      3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction
   A. Verification of Records Search
      1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
      2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
   B. PI Shall Attend Precon Meetings
      1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon

Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11 x 17 inches) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.

2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.

a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.

a. No Discoveries – In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. on the next business day.

b. Discoveries – All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

c. Potentially Significant Discoveries – If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

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

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

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

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)
1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

<u>CPU EIR Mitigation Measures</u>

TRF-1: *Intersections shall be improved per the intersection lane designations identified in Figure 5.12-4a-g of the Otay Mesa Community Plan Update CPU.*

Specific to the proposed project and in accordance with Otay Mesa Community Plan Update EIR Mitigation Measure **TRF-1**, the following project-specific mitigation measures shall be implemented.

TRF-1a: *Phase 1*

Prior to the issuance of any building permit, the applicant shall assure by permit and bond the construction of an exclusive northbound right-turn lane at La Media Road and Otay Mesa Road via widening of La Media Road, satisfactory to the City Engineer. The existing northbound left-turn and shared through right lanes would remain. The improvements must be completed and accepted by the City Engineer prior to first occupancy.

TRF-1b: *Phase 2*

The construction of an exclusive northbound right-turn lane in addition to the existing shared northbound through and right-turn lane identified as mitigation for Phase 1 would also mitigate the impact at the intersection of La Media Road and Otay Mesa Road for Phase 2 project traffic. No additional direct impacts would result from addition of Phase 2 project traffic.

Map Source: Urban Systems Associates, Inc. 2012

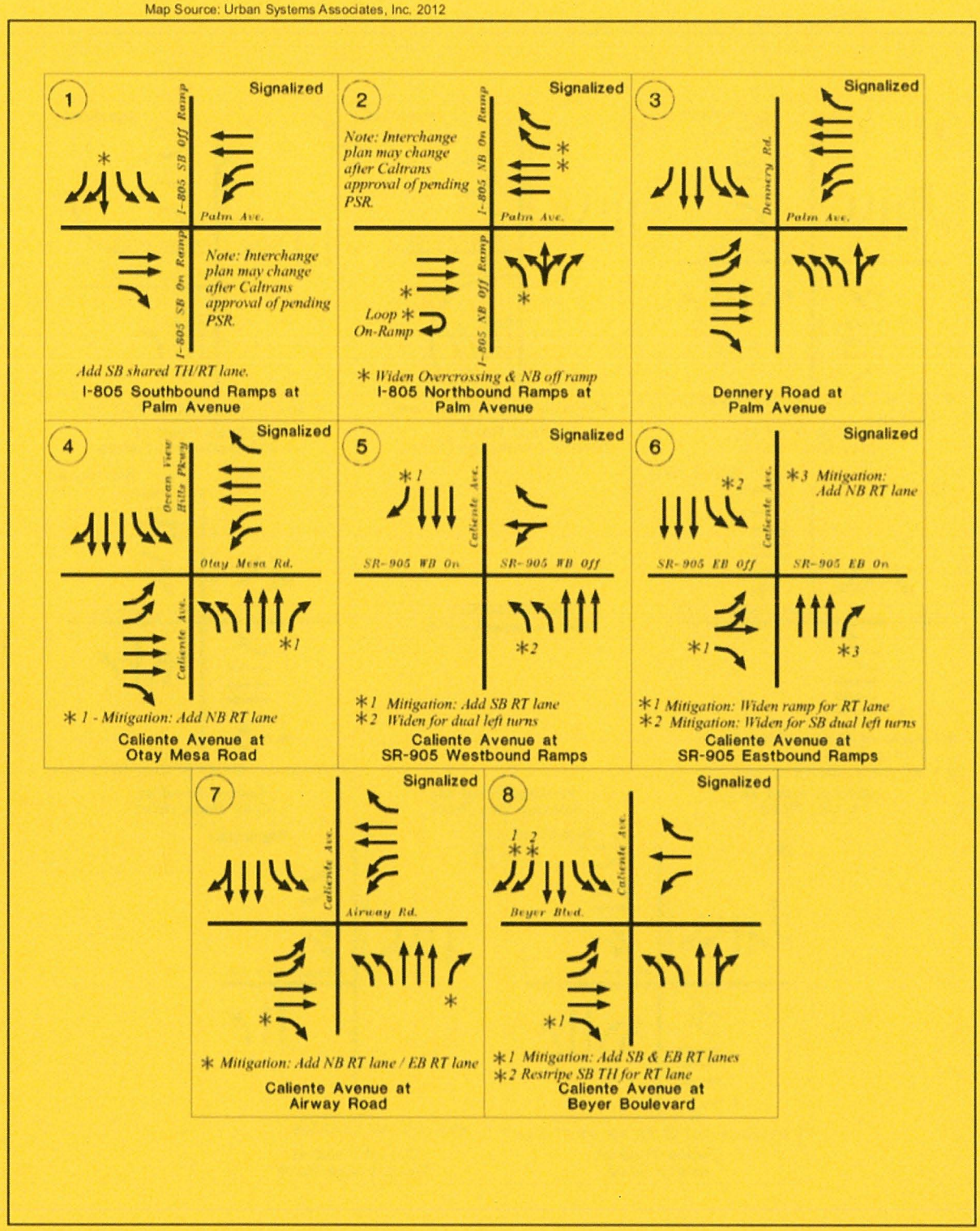

FIGURE 5.12-4a
Buildout Lane Configurations 1-8

Map Source: Urban Systems Associates, Inc. 2012

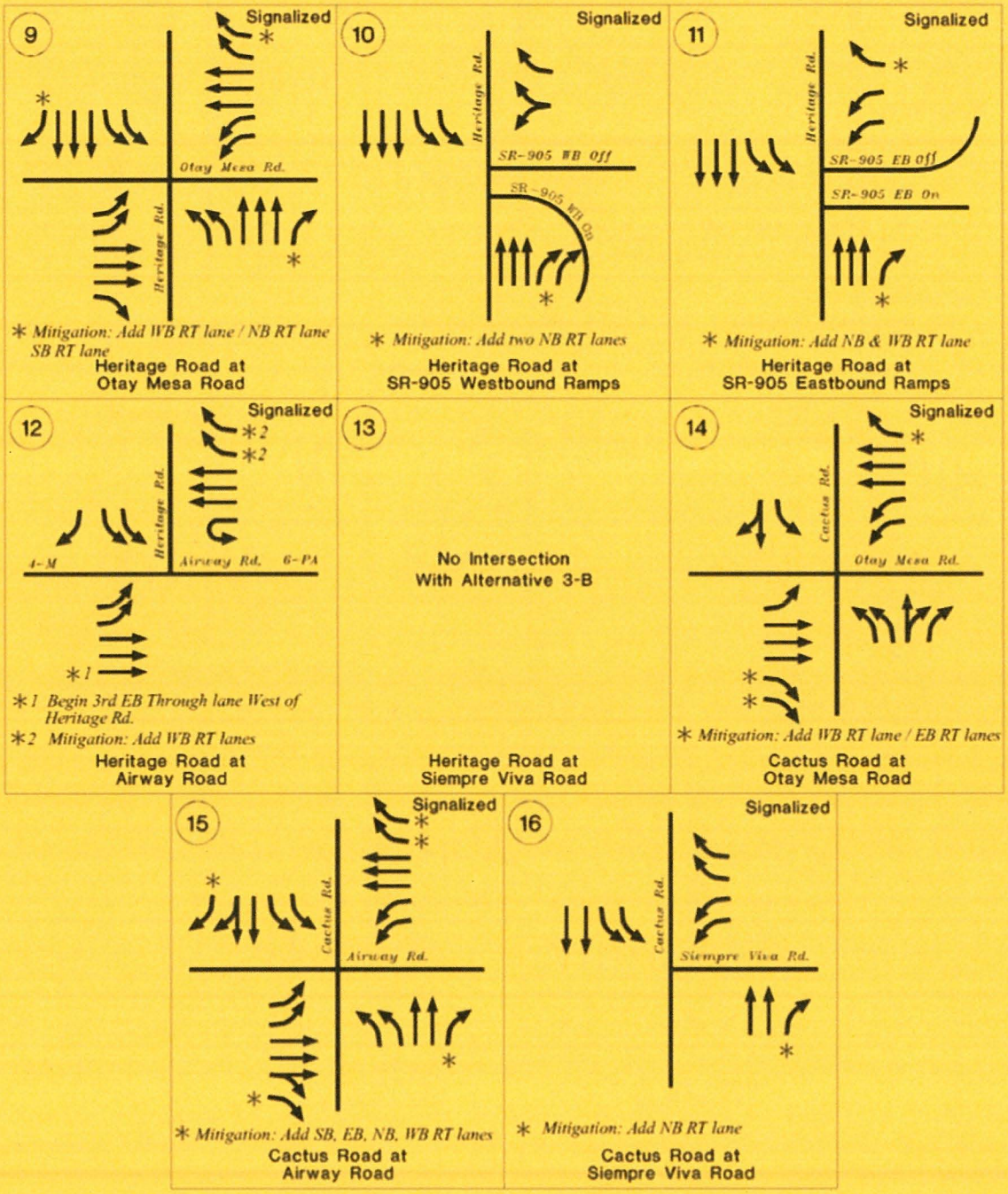

FIGURE 5.12-4b
Buildout Lane Configurations 9-16

Map Source: Urban Systems Associates, Inc. 2012

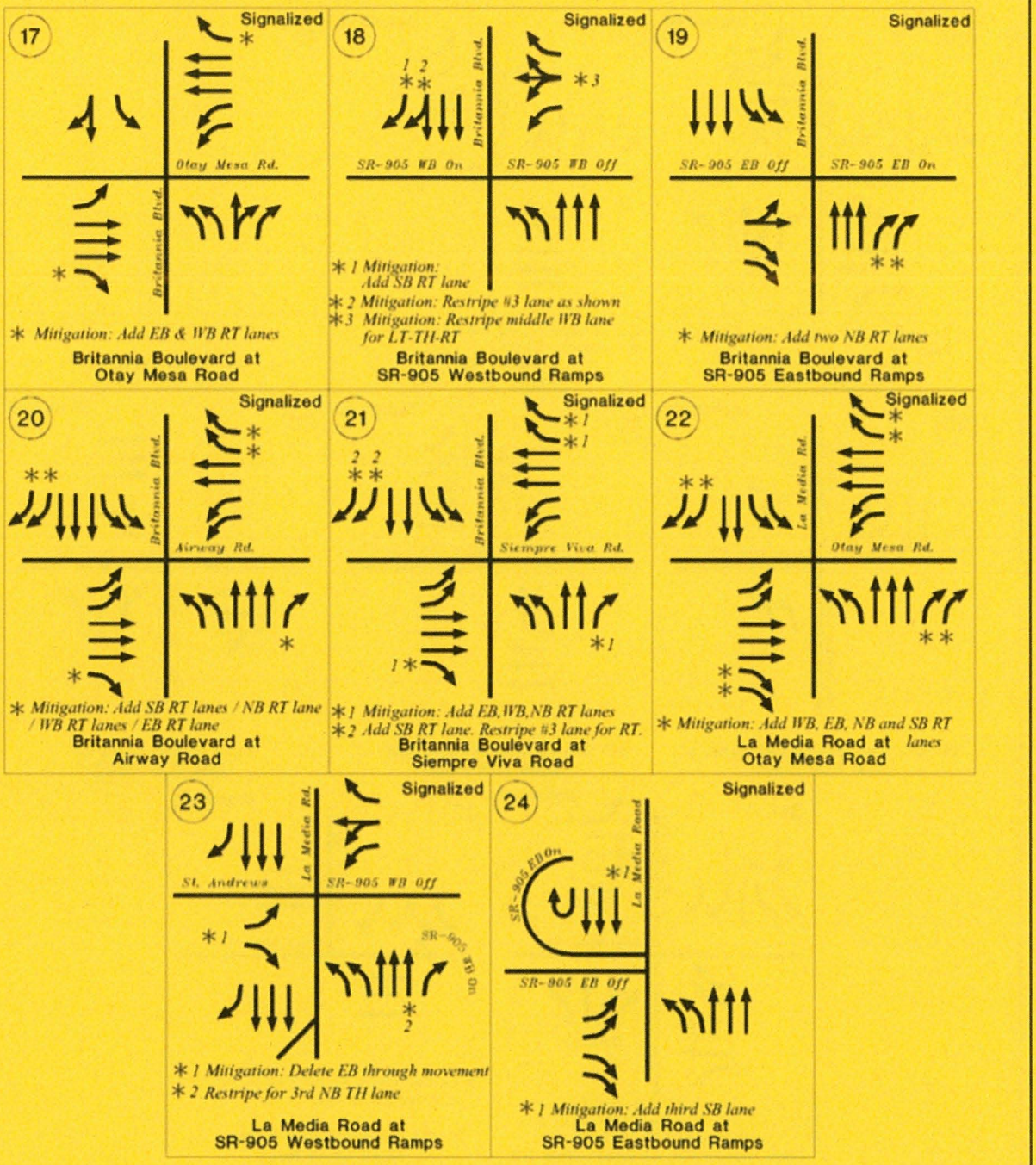

FIGURE 5.12-4c

Buildout Lane Configurations 17-24

Map Source: Urban Systems Associates, Inc. 2012

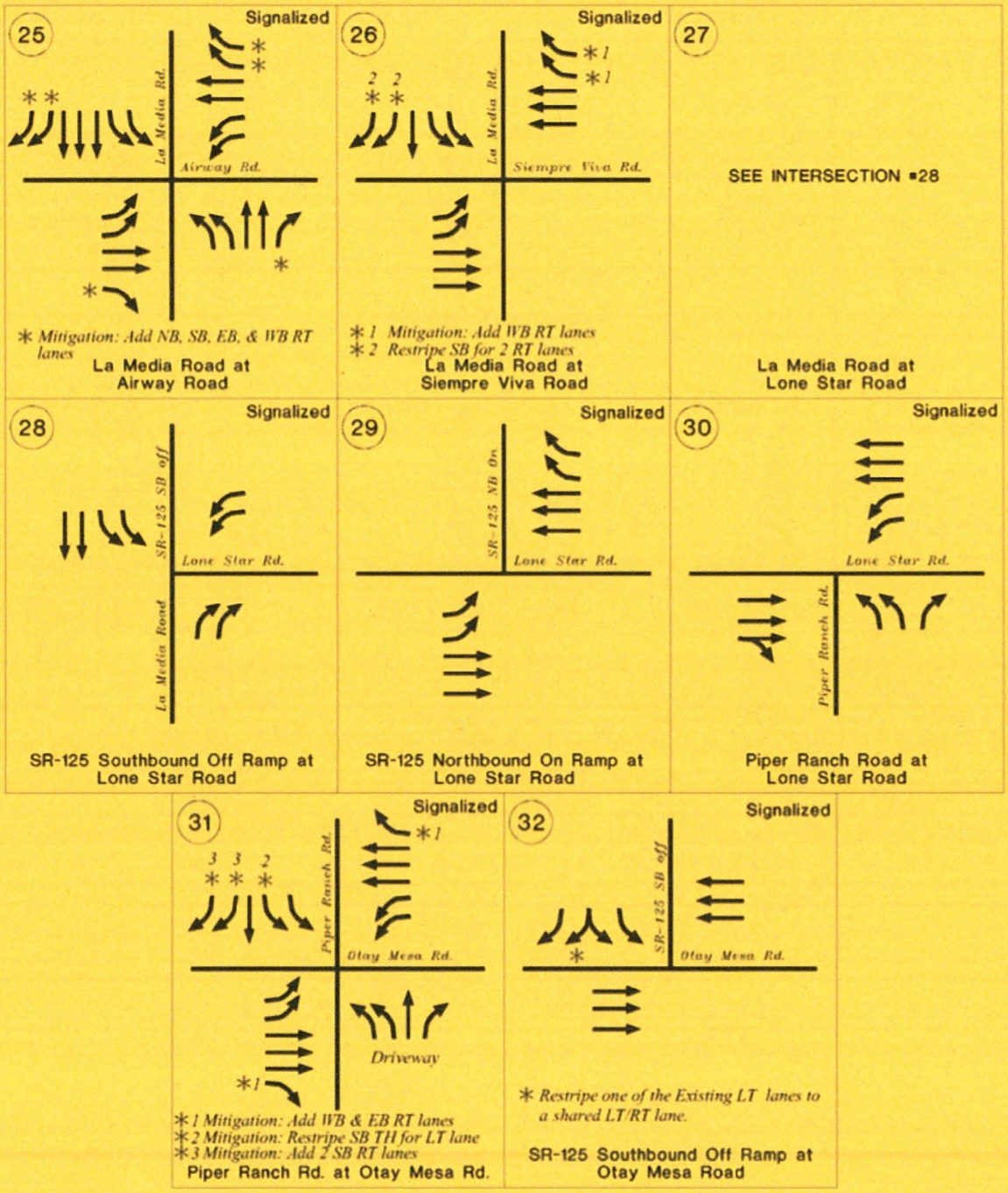

FIGURE 5.12-4d

Buildout Lane Configurations 25-32

Map Source: Urban Systems Associates, Inc. 2012

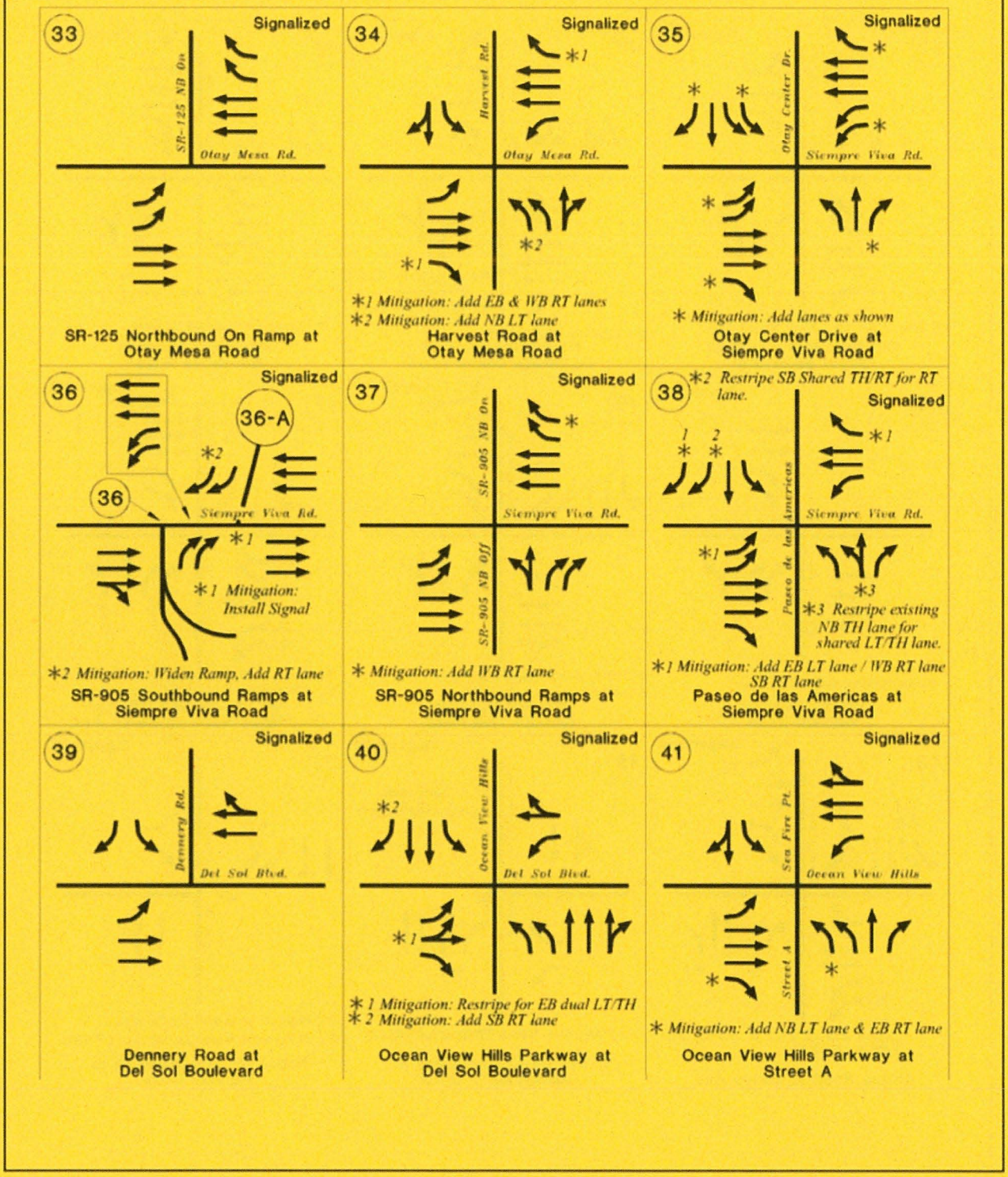

FIGURE 5.12-4e

Buildout Lane Configurations 33-41

Map Source: Urban Systems Associates, Inc. 2012

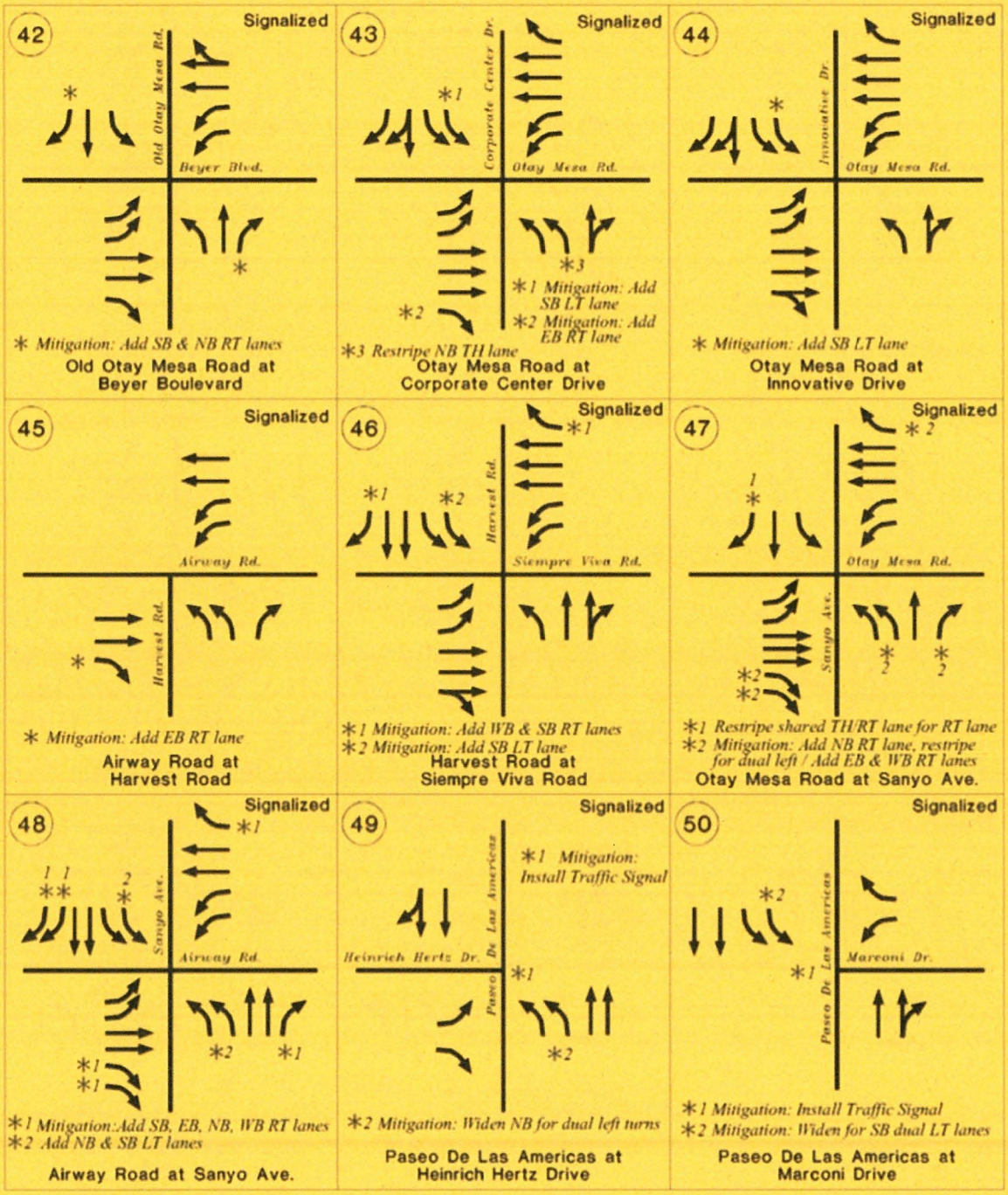

FIGURE 5.12-4f

Buildout Lane Configurations 42-50

Map Source: Urban Systems Associates, Inc. 2012

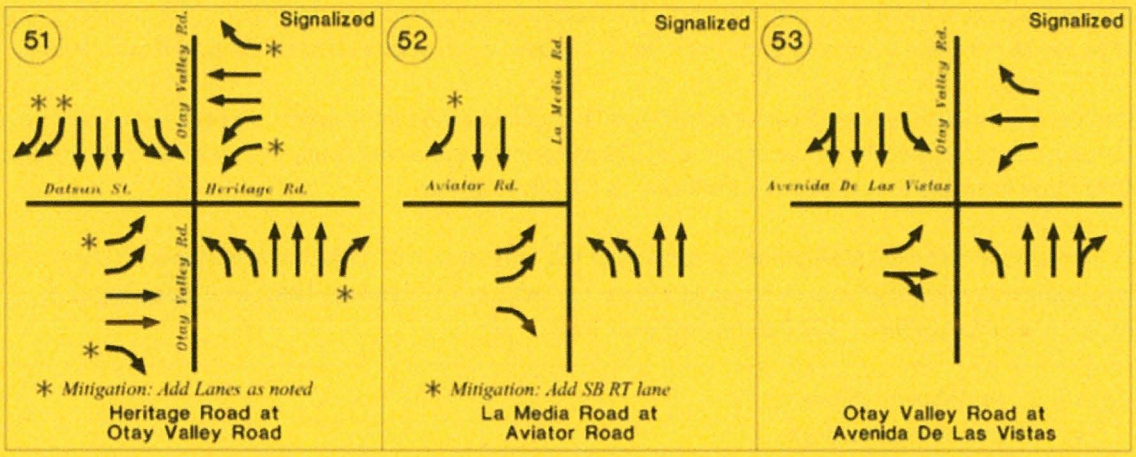

FIGURE 5.12-4g
Buildout Lane Configurations 51-53

TRF-1c: *Horizon Year/Cumulative*

To mitigate the project traffic cumulative impacts, the following mitigations were identified. The proposed project would be pay its fair share to complete the improvements based on the City's standard fair share calculations.

Harvest Road and Otay Mesa Road: A traffic signal is required at this intersection. Prior to the issuance of any building permit, Owner/Permittee shall make 2.78 percent fair share contribution towards a traffic signal at Otay Mesa Road and Harvest Road, satisfactory to the City Engineer.

La Media Road and Otay Mesa Road: In addition to the construction of an exclusive northbound right-turn lane assumed to be added as a direct project impact mitigation, the following lanes would be needed to mitigate the intersection to LOS D during the peak hours:

- 2nd southbound through
- 2nd northbound through
- 2nd northbound left-turn
- Northbound right-turn lane overlap phase
- 2nd eastbound left-turn
- 2nd westbound left-turn

Prior to the issuance of any building permit, Owner/Permittee shall make a 10.90 percent fair share contribution to the widening of the Otay Mesa Road/La Media Road intersection to provide the above lane configuration and operation, satisfactory to the City Engineer.

Cactus Road and Otay Mesa Road: construction of the following lanes would be needed to mitigate the intersection to LOS D during the peak hours:

- 2nd westbound left-turn

Prior to the issuance of any building permit, Owner/Permittee shall make a 4.14 percent fair share contribution to the widening of Otay Mesa Rd to provide a 2nd westbound left lane at the intersection of Otay Mesa Rd/Cactus Rd, satisfactory to the City Engineer.

Heritage Road and Otay Mesa Road: The following lanes would be needed to mitigate impacts at this intersection to LOS D during the peak hours:

- Addition of three northbound lanes to have two left-turn, two through, and one right-turn
- Addition of two southbound lanes to have two left-turn, two though, and one right-turn

Prior to the issuance of any building permit, Owner/Permittee shall make a 2.64 percent fair share contribution to the widening of Otay Mesa Road/Heritage Road to provide the above lane configuration, satisfactory to the City Engineer.

Caliente Avenue/Ocean View Hills Parkway and Otay Mesa Road: The following lanes would be needed to achieve the ultimate configuration identified in the Community Plan and mitigate the intersection impact:

- 2nd eastbound left-turn
- 3rd eastbound through
- 2nd and 3rd westbound through
- 2nd northbound left-turn

- 3rd northbound through

This configuration does not return operations to LOS D or better, but is the ultimate intersection configuration identified in the CPU. The mitigation would result in the intersection continuing to operate at LOS F but with reduced delay compared to Horizon Year 2062 baseline conditions. The Otay Mesa CPU EIR identified this intersection as a significant impact with LOS F during both peak hours. Therefore, the results are consistent with the Otay Mesa CPU EIR findings. Prior to the issuance of any building permit, Owner/Permittee shall make a 2.45 percent fair share contribution towards the widening of Otay Mesa Road/Caliente/Ocean View Hills Parkway to provide the above lane configuration, satisfactory to the City Engineer.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The **Otay Mesa Community Plan Update** EIR No. **30330/304032 SCH No. 2004651076** indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: **land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources**. The CPU EIR concluded that significant impacts related to **air quality (criteria pollutants, stationary sources/ collocation), traffic/circulation, noise (traffic/stationary sources and construction) utilities (solid waste), and greenhouse gas emissions** would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the Community Plan Update would result in significant **circulation/traffic, noise, air quality, utilities (solid waste) and greenhouse gas emissions** impacts, which would remain significant and unmitigated. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the EIR, 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 EIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.
The proposed project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified CPU EIR.

VIII. CERTIFICATION

Copies of the addendum, the EIR, the Mitigation Monitoring and Reporting Program, and associated project-specific technical appendices, if any, may be reviewed by appointment in the office of the Development Services Department, or purchased for the cost of reproduction.

Anna L. McPherson

Anna L. McPherson, AICP
Program Manager
Development Services Department

March 26, 2019
Date of Final Report

Attachments:

List of Acronyms and Abbreviations
References
Figure 1: Location Map
Figure 2: Aerial Photograph
Figure 3: Site Plan
Figure 4: Vesting Tentative Map
Figure 5: Existing Lot Lines and Easements
Figure 6: Proposed Community Plan Amendment
Figure 7: Roadway Layout
Figure 8: Biological Resources
Environmental Impact Report No. 30330/304032 SCH No. 93041010

Appendices:

Appendix A: Air Quality Report
Appendix B: Biological Technical Report
Appendix C: Cultural Resources Survey
Appendix D: Storm Water Quality Management Plan
Appendix E: Drainage Report
Appendix F: Updated Geotechnical Investigation
Appendix G: Noise Study
Appendix H: Transportation Impact Analysis
Appendix I: Sewer Study
Appendix J: CAP Checklist
Appendix K: EnviroFacts Search Memorandum
Appendix L: Waste Management Plan
Appendix M: Resource Management Plan for the Turecek Off-site Mitigation Parcel for the Sunroad Otay Project

LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADT	Average Daily Traffic
ALUCP	Airport Land Use Compatibility Plan
AM/am	morning
AMSL	above mean sea level
BAU	Business As Usual
BMP(s)	Best Management Practice(s)
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CPA	Community Plan Amendment
CPIOZ	Community Plan Implementation Overlay Zone
CPU	Community Plan Update
CRHR	California Register of Historic Resources
dBA	A-weighted decibel
DEH	County Department of Environmental Health
DHS	California Department of Health Services
EDU	equivalent dwelling units
EPA	Environmental Protection Agency
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
GHG	greenhouse gas
LEED	Leadership in Energy and Environmental Design
Leq	equivalent continuous sound level
MHPA	Multi Habitat Planning Area
MLD	Most Likely Descendent
MMRP	Mitigation Monitoring Reporting Program
MRZ	Mineral Resources Zone
MSCP	Multiple Species Conservation Program
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NO_x	oxides of nitrogen

EIR	Program Environmental Impact Report
PDP	Planned Development Permit
PDPs	Priority Development Project
PM/pm	afternoon
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter of 10 microns in diameter or smaller
ppm	parts per million
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RMP	Resource Management Plan
ROGs	Reactive Organic Gases
SANDAG	San Diego Association of Governments
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SIP	State Implementation Plan
SLF	Sacred Lands Files
SWQMP	Storm Water Quality Management Plan
SO_x	oxides of sulfur
TAC(s)	Toxic Air Contaminant(s)
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis
TNM	Traffic Noise Model
USFWS	U.S. Fish and Wildlife Service
VOC	Volatile Organic Compounds
VTM	Vesting Tentative Map
WMP	Waste Management Plan

REFERENCES

Alden Environmental, Inc. *Biological Technical Report for the Sunroad Otay Project*. (February 21, 2019)

Alden Environmental, Inc. *Resource Management Plan for the Turecek Off-site Mitigation Parcel for the Sunroad Otay Project*. (March 4, 2019)

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(December 20, 2010).

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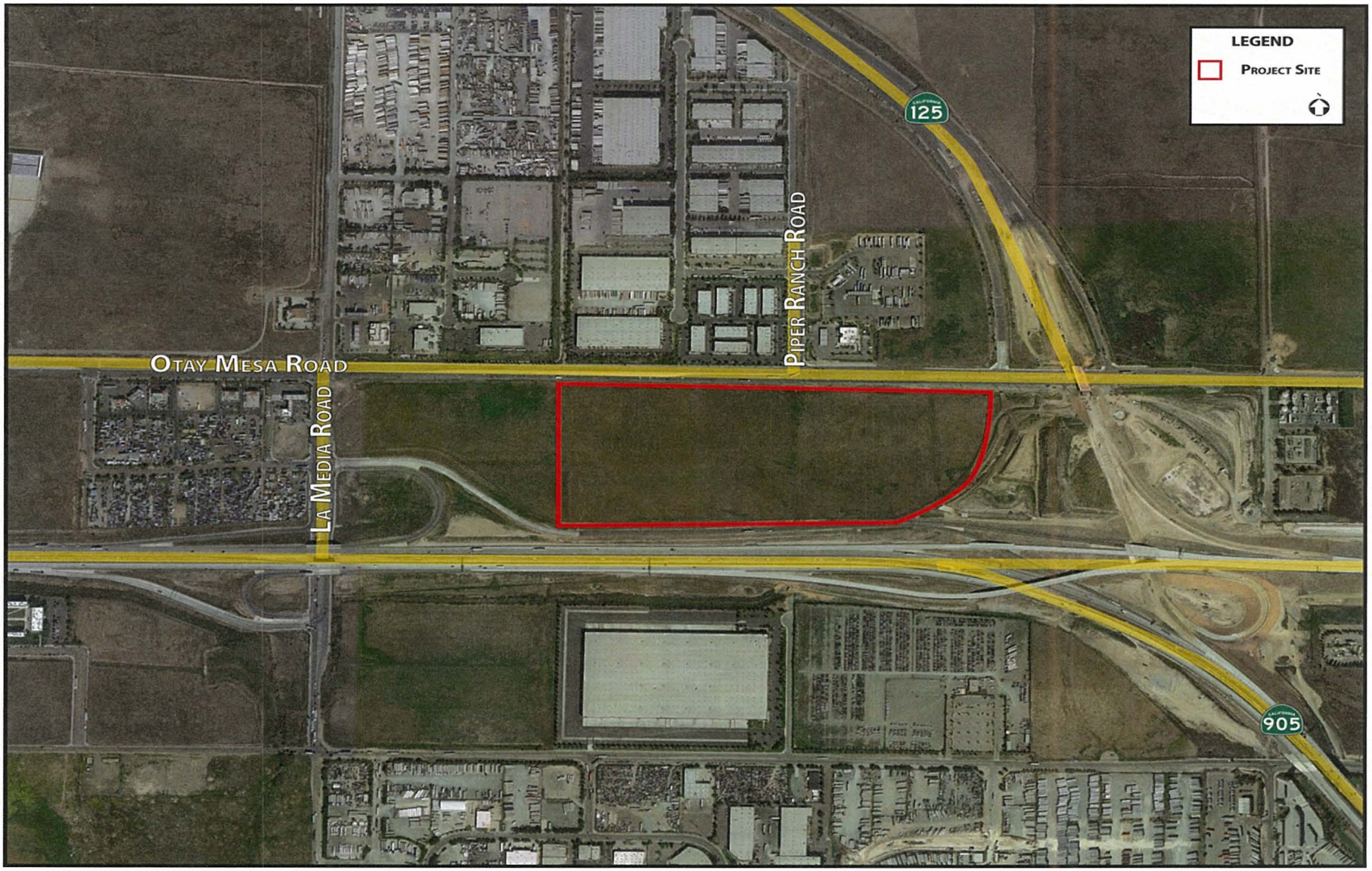


Figure 1. ***Location Map***

Figure 2. ***Aerial Photograph***

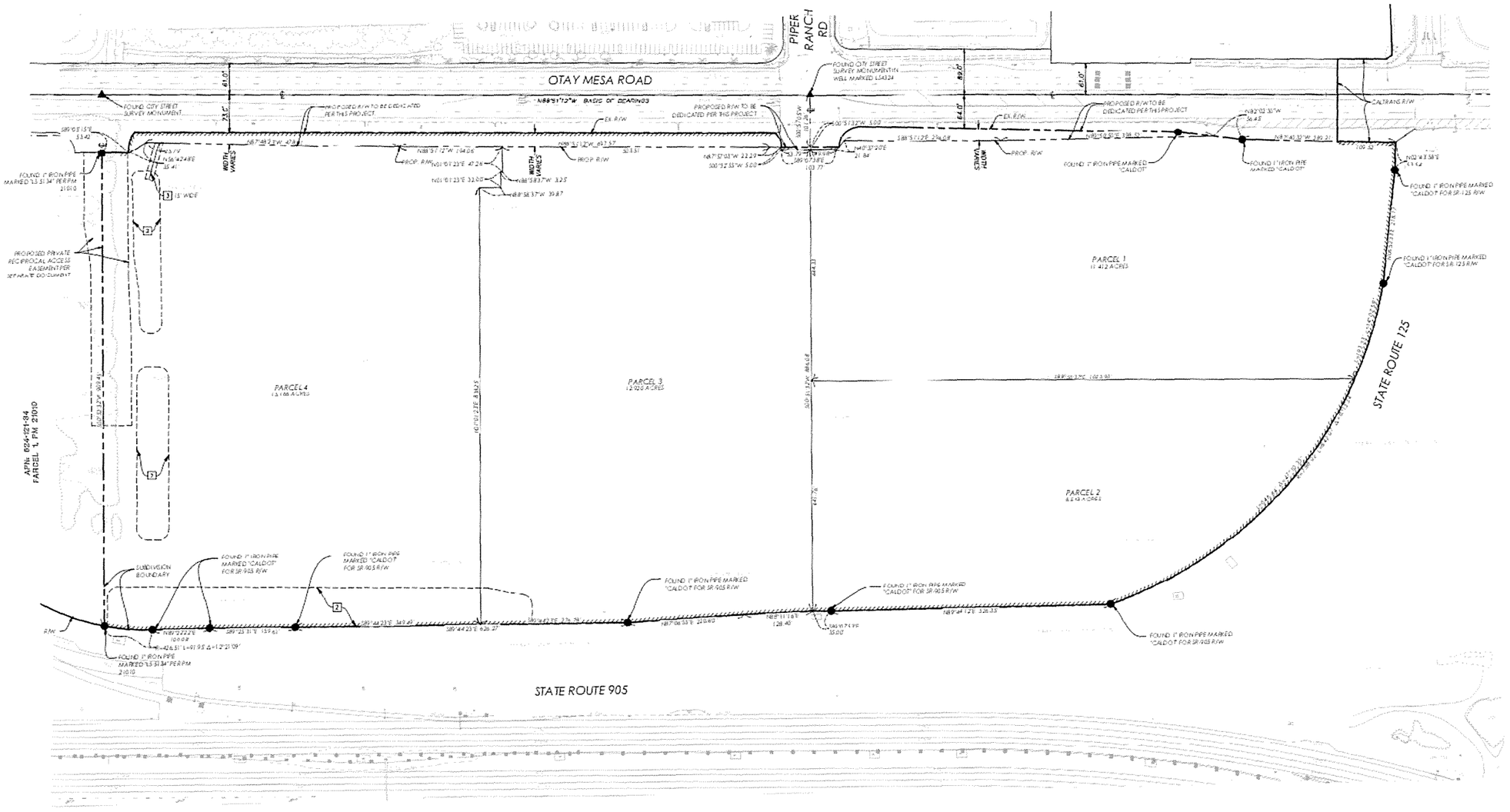
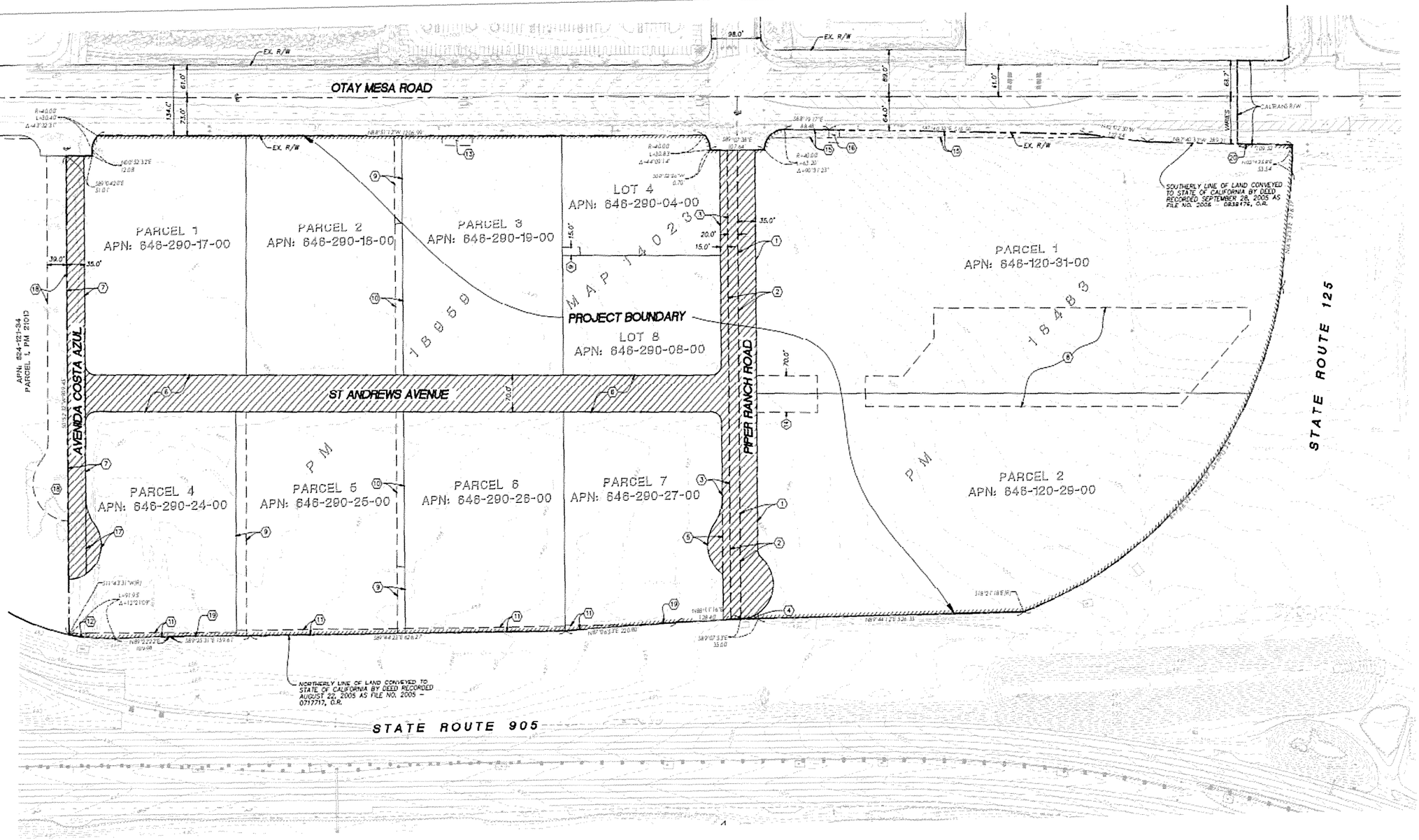


Figure 3. ***Vesting Tentative Map***



LEGEND

- SUBDIVISION BOUNDARY
- CENTERLINE
- PUBLIC RIGHT-OF-WAY TO BE VACATED
- EASEMENTS
- FOUND STANDARD WELL MONUMENT AS NOTED
- FOUND MONUMENT AS NOTED

NORTH

GRAPHIC SCALE IN FEET

Figure 4. ***Existing Lot Lines and Easements***

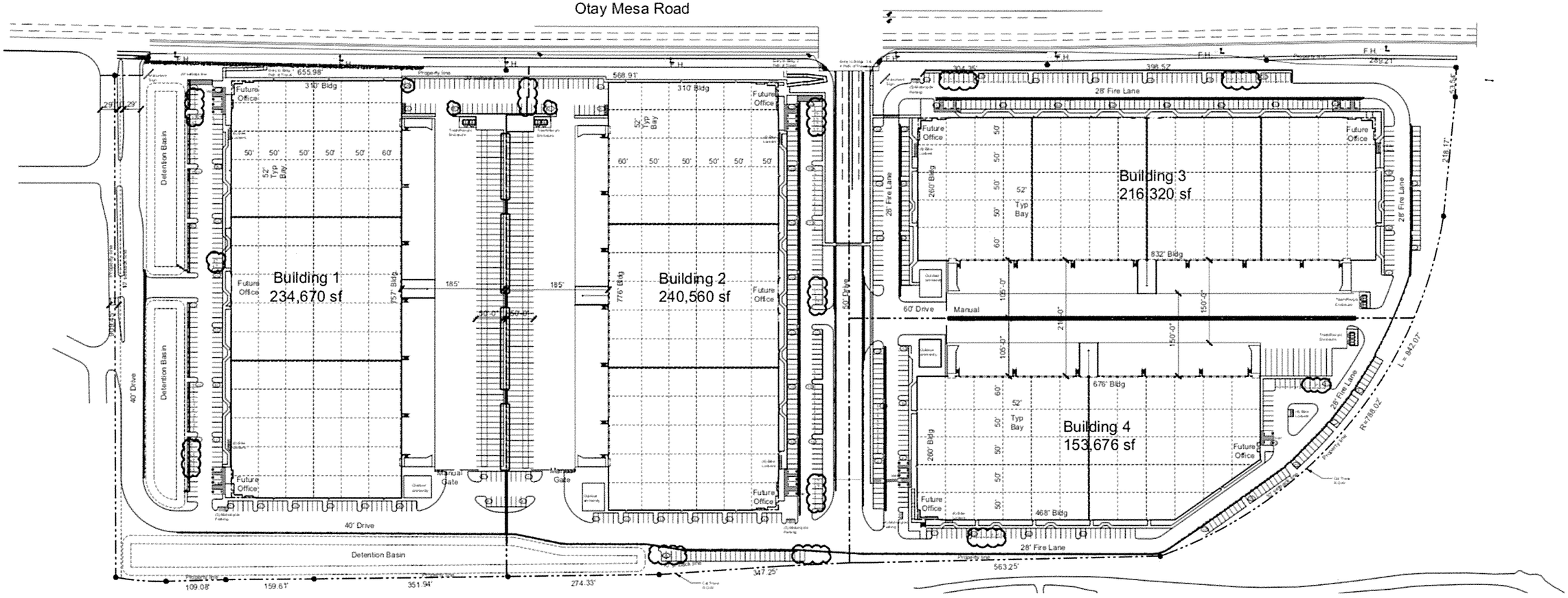


Figure 5. ***Site Plan***

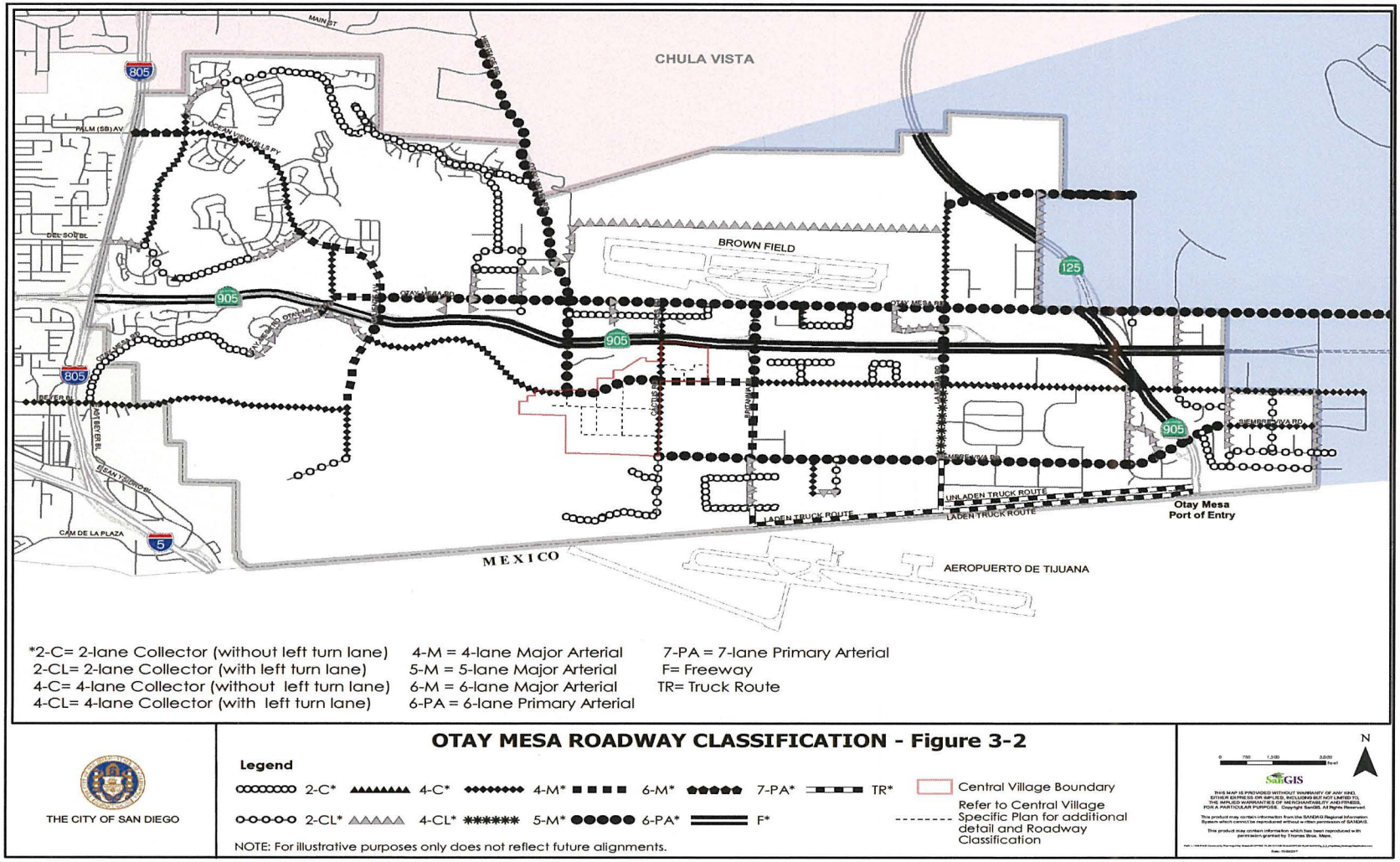


Figure 6. Proposed Community Plan Amendment

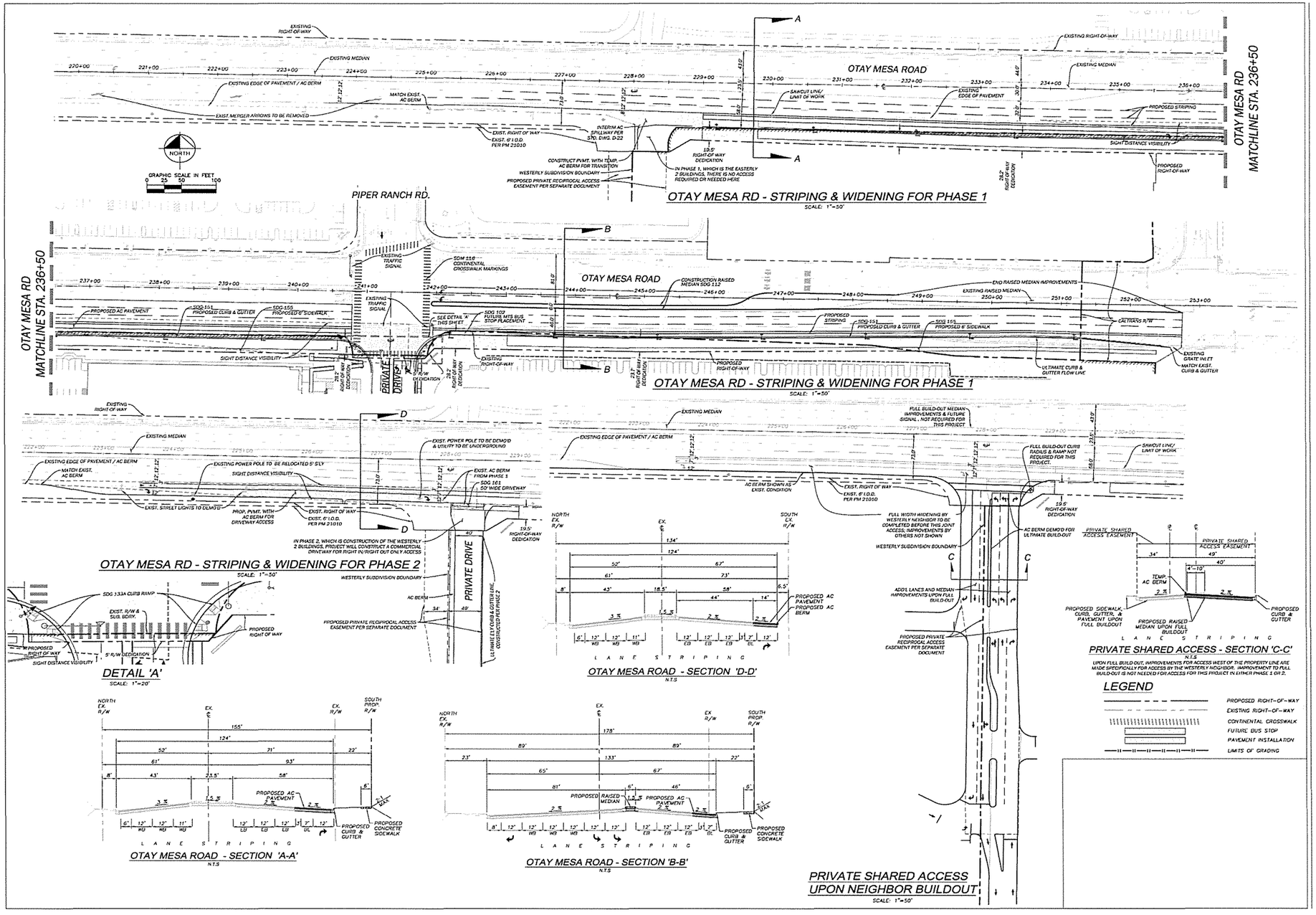
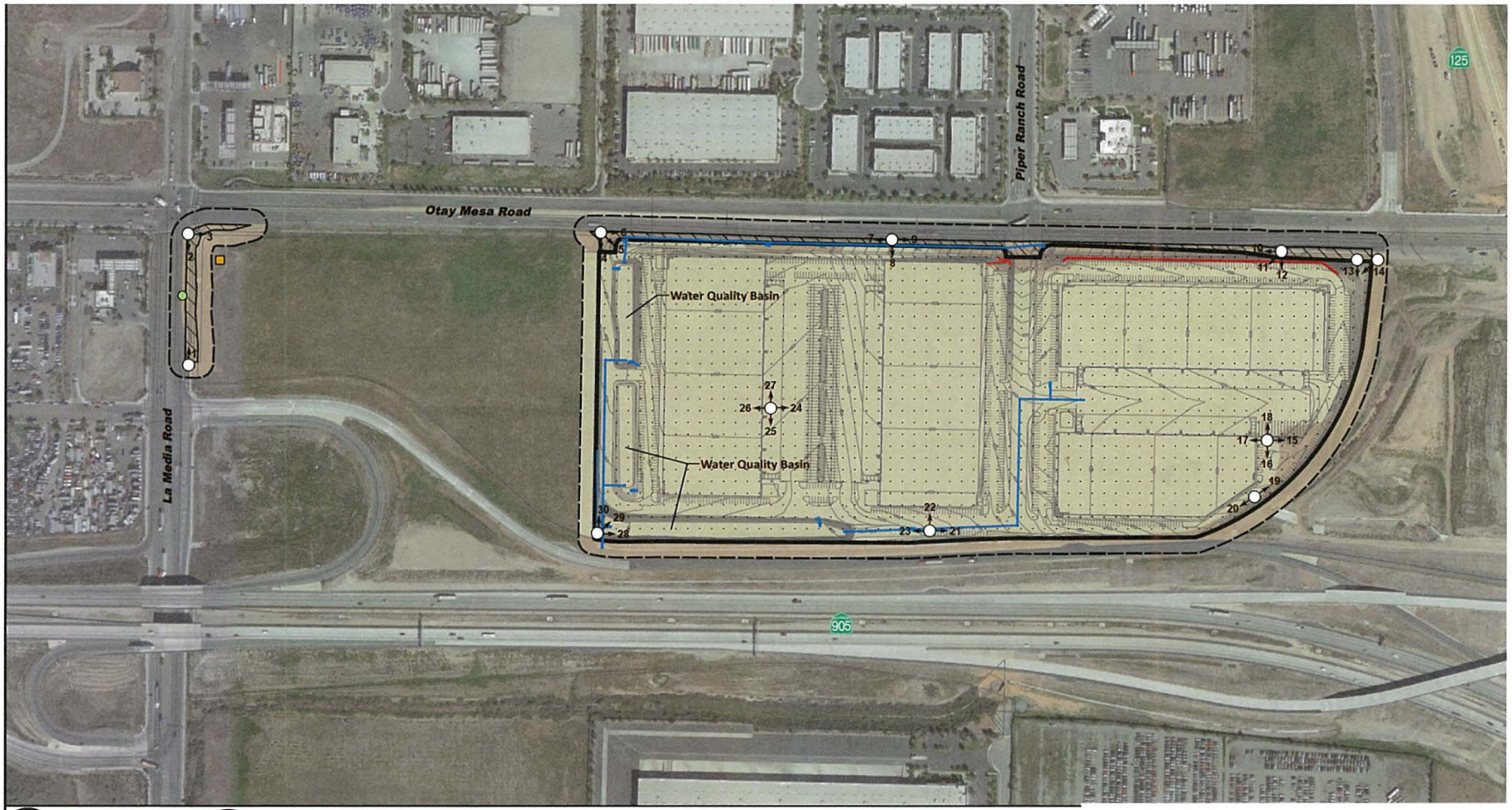


Figure 7. Roadway Layout



*Observed during Recon survey for adjacent property (April 4, 2017).
California horned lark (*Eremophila alpestris actia*) and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) were observed in non-native grassland by REC in 2016 but were not mapped.

Figure 8. ***Biological Resources***