THE CITY OF SAN DIEGO

ADDENDUM

Project No. 668005
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: **Sanyo Logistics Center**: A request for a SITE DEVELOPMENT PERMIT to construct two multi-tenant industrial distribution buildings with a total of 232,969 square feet of warehouse space and 10,000 square feet of associated office space. The two industrial buildings would include 45 truck dock doors, 4 on-grade doors, 270 surface parking spaces, including 10 accessible parking spaces, and 6 motorcycle parking spaces. The project would provide half-width improvements to meet the ultimate classification of a 4-lane Major on Airway Road and 4-lane Collector with a two-way left-turn lane on Sanyo Avenue. The project would dedicate between 11 feet and 40 feet along its frontage on Airway Road in order to allow for roadway widening and construct a 22-foot parkway on Airway Road, consisting of a 6-foot non-contiguous sidewalk and a 16-foot landscape buffer. The project would also dedicate 13 feet along its frontage on Sanyo Avenue in order to allow for roadway widening and would construct a 14-foot parkway on Sanyo Avenue, consisting of a 5-foot non-contiguous sidewalk and a 9-foot landscape buffer. The 14.85-acre vacant site is located west of Sanyo Avenue and north of Airway Road. The project site is designated as Light Industrial and zoned as Light Industrial (IL-2-1) per the Otay Mesa Community Plan (OMCP). Additionally, the project site is located within the Community Plan Implementation Overlay Zone A (CPIOZ-A), Airport Land Use Compatibility Overlay Zone (Brown Field Airport), Airport Influence Area (Review Area 2-Brown Field Airport), Federal Aviation Administration Part 77 Notification Area (Brown Field Airport), Parking Standards Transit Priority Area, and the Prime Industrial Lands, and Transit Priority Area. (Legal Description: APN 646-130-55). Applicant: Badiee Development.

I. SUMMARY OF ORIGINAL PROJECT

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

update of the OMCP Public Facilities Financing Plan (PFFP). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the OMCPU Final PEIR examined the environmental impacts of the OMCP.

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

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

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

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

As it pertains to the OMCP, the site consists of undeveloped land within the South District and is designated as Light Industrial, which allows for a full range of light manufacturing and research and development uses, as well other industrial uses such as storage and distribution and transportation terminals. The OMCP zones the site Light Industrial (IL-2-1).

II. SUMMARY OF PROPOSED PROJECT

A request for a SITE DEVELOPMENT PERMIT to construct two multi-tenant industrial distribution buildings with a total of 232,969 square feet of warehouse space and 10,000 square feet of associated office space. The two industrial buildings would include 45 truck dock doors, 4 on-grade doors, 270 surface parking spaces, including 10 accessible parking spaces, and 6 motorcycle parking spaces. The project would provide half-width improvements to meet the ultimate classification of a 4-lane Major on Airway Road and 4-lane Collector with a two-way left-turn lane on Sanyo Avenue. The project would dedicate between 11 feet and 40 feet along its frontage on Airway Road in order to allow for roadway widening and construct a 22-foot parkway on Airway Road, consisting of a 6-

foot non-contiguous sidewalk and a 16-foot landscape buffer. The project would also dedicate 13 feet along its frontage on Sanyo Avenue in order to allow for roadway widening and construct a 14-foot parkway on Sanyo Avenue, consisting of a 5-foot non-contiguous sidewalk and a 9-foot landscape buffer.

The project site is undeveloped, but existing public utilities are located within the surrounding roadways. One existing 12-inch polyvinyl chloride (PVC) sewer laterals traverses Airway Road, while one existing 12-inch PVC sewer lateral and one 10-inch water pipe traverse Sanyo Avenue. The project would connect to an existing 16-inch PVC sewer main and 12-inch water pipe that currently traverse Airway Road. There are currently no storm drain facilities on the property, and existing on-site drainage consists of natural and sheet flows from south to north. Off-site drainage enters the project site from two locations: Airway Road from Avenida De Las Americas to west of Sanyo Avenue and the Otay International Center detention basin located south of Airway Road. The project would install one biofiltration basin for water quality, hydromodification, and peak flow detention in the northwest portion of the project site. The project would install four green street bioswales to provide source control of stormwater, limit stormwater transport and pollutant conveyance to the public storm drain system on Sanyo Avenue and Airway Road. The project would also introduce an underground system of storm drainpipes and inlets to convey runoff from south to north. Off-site flows from the south would be intercepted by a proposed storm drain and bypassed across the project site through the underground system of pipes to the project's point of compliance in the northwestern portion of the project site.

The maximum depth of cut slopes would be ten feet from mass grade to finish grade, and the maximum height of fill slopes would be three feet from mass grade to finish grade. Project construction would require 19,380 cubic yards of cut and 99,754 cubic yards of fill, resulting in a net import of 80,374 cubic yards of soil. All landscaping materials and irrigation within the project site would conform to the requirements of the City LDC Landscape Standards and the applicable sections of San Diego Municipal Code Chapter 14, Article 2, Division 4: Landscape Regulations. The landscape plan would consist of natural, drought-tolerant plant palette. Site access would be provided via two driveways along Airway Road and one driveway along Sanyo Avenue. Figures 1 and 2 present the regional and project locations, respectively. Figure 3 presents the proposed site plan.

III. ENVIRONMENTAL SETTING

The 14.85-acre undeveloped site is located west of Sanyo Avenue and north of Airway Road. Vegetation on the project site consists primarily of upland vegetation (14.14 acres), along with a wetlands (0.71 acre). Site topography is gently to moderately sloping, with elevations ranging from 527 to 561 feet above mean sea level. The project is surrounded by existing industrial uses to the south and east, a mix of existing industrial uses and undeveloped land to the north, and State Route (SR) 905 to the west. Brown Field Municipal Airport is located approximately 1.1-mile northwest of the project site. In addition, the project site is located in a developed area currently served by existing public services and utilities.

The project site is designated Light Industrial and zoned Light Industrial (IL-2-1) per the OMCP. Additionally, the project site is located within the CPIOZ-A, Airport Land Use Compatibility Overlay Zone (Brown Field Airport), Airport Influence Area (Review Area 2-Brown Field Airport), Federal

Aviation Administration Part 77 Notification Area (Brown Field Airport), Parking Standards Transit Priority Area, and the Prime Industrial Lands, and Transit Priority Area.

IV. ENVIRONMENTAL DETERMINATION

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

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

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

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

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

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

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

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

Based upon a review of the current project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The OMCPU Final

PEIR has been incorporated by reference pursuant to CEQA Guidelines Section 15150. Public review of this Addendum is not required per the CEQA.

V. IMPACT ANALYSIS

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

The OMCPU Final PEIR identified significant unmitigable impacts related to noise, transportation/ circulation, air quality, GHG emissions, and utilities (solid waste) as these issue areas would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the OMCPU would result in significant transportation/circulation, air quality, noise, utilities (solid waste), and GHG emissions, which would remain significant and unmitigable.

The OMCPU Final PEIR identified direct significant impacts that would be substantially lessened or avoided with implementation of the mitigation framework to be implemented by subsequent projects: land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources.

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

Table 1
Impact Assessment Summary

Environmental Issues	OMCPU Final PEIR Finding Analysis	OMCP Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Land Use	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Visual Effects and Neighborhood Character	Less than significant	No	No new impacts	No	Less than Significant
Air Quality/Odor	Significant, unmitigated	Yes	No new impacts	No	Less than Significant
Biological Resources	Significant but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less Than Significant
Historical Resources	Significant, but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than Significant

Table 1 Impact Assessment Summary					
Environmental Issues	OMCPU Final PEIR Finding Analysis	OMCP Mitigation	Project	Project Level New Mitigation?	Project Resultant Impact
Human Health/Public Safety/Hazardous Materials	Significant, but mitigated	Yes	No new impacts	No	Less than Significant
Hydrology/Water Quality	Significant but mitigated	Yes	No new impacts	No	Less than Significant
Geology/Soils	Significant but mitigated	Yes	No new impacts	No	Less than significant
Energy Conservation	Less than significant	No	No new impacts	No	Less than significant
Noise	Significant, unmitigated	Yes	No new impacts	No	Less than Significant
Paleontological Resources	Significant but mitigated	Yes	No new impacts	No	Mitigated to a Level Less Than Significant
Transportation/ Circulation	Significant, unmitigated	Yes	No new impacts	Yes	Mitigated to a Level Less Than Significant
Public Services	Less than significant	No	No new impacts	No	Less than Significant
Utilities	Significant, unmitigated	Yes	No new impacts	No	Less than significant
Water Supply	Less than significant	No	No new impacts	No	Less than significant
Population and Housing	Less than significant	No	No new impacts	No	Less than significant
Agricultural and Mineral Resources	Less than significant	No	No new impacts	No	Less than significant
Greenhouse Gas Emissions	Significant, unmitigated	Yes	No new impacts	No	Less than significant

Land Use

OMCPU Final PEIR

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

The OMCPU Final PEIR identified that residential and industrial uses collocated in proximity to one another could result in incompatible land use impacts. The OMCPU Final PEIR further identified that future development projects would be required to comply with the collocation policies of the General Plan and OMCP to reduce or avoid potential land use incompatibility impacts. The OMCPU Final PEIR determined that compliance with the OMCP and General Plan policies, along with local, state, and federal regulations, would reduce potential impacts of collocation to below a level of significance. As detailed in Section 5.2.4.2(b) of the OMCPU Final PEIR, implementation of the OMCP would entail the conversion of industrial and agricultural lands to residential and other mixed uses.

The environmental effects that would result include the increased potential for exposure of sensitive receptors to hazardous materials. Through implementation of the mitigation framework, the potential environmental impacts resulting from change in land use designations in accordance with the OMCP were determined to be less than significant.

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

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

Project

The existing General Plan and Community Plan land use designation for the project site is Light Industrial, and the existing zoning designation is Light Industrial (IL-2-1). Development of the proposed industrial use would be consistent with the existing land use and zoning designations. The proposed industrial use would be consistent with the industrial land uses located adjacent to the eastern and southern project boundaries, and along the western portion of the northern project boundary. Therefore, the project would not divide an established community, and impacts would be less than significant.

The purpose of the ESL Regulations (LDC Sections 143.0101 – 143.0160) is to protect, preserve, and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The project site does not include steep hillsides, or coastal bluffs, and is not located within the 100-year floodplain. However, the project site does contain ESL due to the presence of sensitive biological resources. As described in the discussion of potential impact to biological resources below, the project would implement mitigation measures MM-BIO-1 through MM-BIO-3, as detailed in the project's Mitigation Monitoring Reporting Program (MMRP), to reduce impacts to a level less than significant. These mitigation measures are consistent with OMCPU Final PEIR mitigation framework measures BIO-1 and BIO-4. Therefore, the project would be consistent with the City's ESL Regulations.

The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. As described in the discussion of potential impact to historical resources below, there are no historic buildings, structures, or objects on the project site, and the Native American Heritage Commission (NAHC) records search of their Sacred Lands File was negative. Two isolates were identified during the survey of the project site that are not considered historical resources under the California Register of Historic Resources (CRHR) or the City's inventory requirements. The field survey of the project site did not identify any other cultural material. However, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. The project would implement mitigation measure MM-HIST-1 Archaeological Monitoring, as detailed in the MMRP, to reduce impacts related to archaeological resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure HIST-1. Therefore, the project would be consistent with the City's Historical Resources Regulations.

Review of the Brown Field Municipal Airport, Airport Land Use Compatibility Plan (ALUCP) Exhibit III-1 Noise determined that the project site is located outside of the 60 A-weighted decibels [dB(A)] Community Noise Equivalent Level (CNEL) noise contour, and therefore would be exposed to aircraft noise levels less than 60 dB(A) CNEL. Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is not located within a safety zone. The project site is located within Airport Influence Area - Review Area 2 for Brown Field Municipal Airport and within the Federal Aviation Administration (FAA) Part 77 Notification Area for Brown Field Municipal Airport. The project building's maximum height of 35 feet would not exceed applicable height limits for this zone and would not create a hazard related to air navigation. Therefore, project land uses would be compatible with the applicable airport compatibility plan, and impacts would be less than significant.

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

Visual Effects and Neighborhood Character

OMCPU Final PEIR

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

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

The OMCPU Final PEIR determined that impacts associated with compatibility with surrounding neighborhood character would be less than significant, as future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and OMCPU. The OMCPU Final PEIR determined that vacant, graded areas within the Northwest District are not considered visually sensitive and future development would improve visual compatibility with existing development. Through implementation of the plan update, the visual character of the OMCP area would become more urbanized. The land use and development design guidelines and policies of the OMCP are intended to ensure that future development within the OMCP area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. Future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and OMCPU. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element would be subject to review in accordance with CPIOZ-A. Development proposals that do not comply with the CPIOZ-A supplemental regulations would be subject to discretionary review in accordance with CPIOZ-B. Therefore, impacts would be less than significant.

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

The OMCPU Final PEIR identified that the OMCP could result in a negative visual appearance due to the loss, covering, or modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient Future development would be required to comply

with relevant development regulations, ESL regulations, and relevant land use and development design guidelines and policies of the General Plan and OMCPU. Therefore, impacts were determined to be less than significant. Overall, adherence to existing policies and regulations, as well as implementation of the OMCP policies would ensure that potential impacts would be below a level of significance.

Project

The project site is surrounded by existing industrial land uses located immediately to the south and east, and along the easternmost portion of the northern project boundary. SR-905 traverses the western project boundary. These industrial and transportation uses obscure views from the project site. Additionally, there are no scenic amenities, such as public views of canyons and mesas, that are visible from the project site. Review of Figure 5.2-8 of the OMCPU Final PEIR determined that there are no view corridors within proximity of the project site, and views of the closest one at the intersection of Airway Road and La Media Road would be obscured by SR-905. The project has been designed with appropriate setbacks and would introduce landscaping along the frontages with Airway Road and Sanyo Avenue that would improve the visual quality of the project site. The project would comply with applicable land use and development design guidelines and policies of the OMCP which are intended to ensure that future development within the OMCP area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development. The project would be compatible with the scale and design of surrounding development, and impacts would be less than significant.

Review of Figure 3-3 of the OMCPU Final PEIR determined that the project site is located within the "South District," which consists of a mix of industrial, agricultural, and commercial uses. The OMCPU Final PEIR determined that implementation of the OMCP would result in the conversion of vacant parcels and agricultural uses to industrial uses, anticipating that these industrial uses would be large warehouse-type structures and automotive lots. The OMCPU Final PEIR determined that this intensification of industrial uses would be consistent with the existing character of the Southern District, and that impacts would be less than significant. The project would be consistent with the conclusion of the OMCPU Final PEIR because it would convert a vacant parcel consisting primarily of non-native grassland to an industrial use consistent with the character of the surrounding industrial land uses. Additionally, the project has been designed consistent with all applicable design guidelines of the OMCP. Therefore, the project would be consistent with surrounding development, and impacts would be less than significant.

The project site does not contain any unique physical features such as a natural canyon or natural hillside slopes. Although the project would alter more than 2,000 cubic yards of earth per graded acre, the project would not meet any of the conditions that would result in a significant impact related to landform alteration. There are no steep hillsides on the project site due to the gently to moderately sloping site topography, with elevations ranging from 527 to 561 feet above mean sea level. Similarly, the project would not require mass terracing of natural slopes. Furthermore, the project would not create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Therefore, the project would not project result in a substantial change in the existing landform or loss of unique physical features, and impacts would be less than significant.

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

Air Quality

OMCPU Final PEIR

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

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

The OMCPU Final PEIR concluded that the OMCP could result in air quality impacts related to criteria pollutant emissions from construction and operation of a project within the OMCP area. The OMCPU Final PEIR included mitigation measure AQ-1, which would require best available control measures/technology to be implemented during construction activities when construction emissions would exceed applicable thresholds, and mitigation measure AQ-2, which would require any future projects that significantly impact air quality to be conditioned with all reasonable mitigation to avoid, minimize, or offset the impact and to buffer sensitive receptors through the use of landscaping, open space or other techniques. However, the OMCPU Final PEIR determined that, while the mitigation framework and OMCPU policies would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts associated with criteria pollutant emissions would remain significant and unavoidable.

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

The OMCPU Final PEIR determined that impacts associated with collocation of sensitive receptors with commercial and industrial uses could result in exposure of sensitive receptors to toxic air emissions, resulting in a significant impact. The OMCPU Final PEIR included mitigation measure AQ-4, which requires a health risk assessment to be prepared for any project locating sensitive receptors closer than their recommended buffer distances to toxic air emitters. However, this impact likewise would remain significant and unavoidable.

The OMCPU Final PEIR concluded that there are no known sources of specific, long-term odors within the community plan area, and that none of the identified land uses would typically be

associated with the creation of objectionable odors. In addition, the OMCPU Final PEIR concluded that since the OMCP did not include any new sources of odor that would affect sensitive receptors (schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities), impacts associated with odors would be less than significant.

Project

Project-specific construction and operational air emissions were calculated using California Emissions Estimator Model (CalEEMod; RECON Environmental [RECON] 2021a) to assess potential air quality impacts consistent with the OMCPU Final PEIR mitigation framework.

The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's (SDAPCD's) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The San Diego Air Board is designated non-attainment for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone (O_3). The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would not conflict with the RAQS. The project site is designated Light Industrial and zoned IL-2-1 (Light Industrial) per the OMCP. The project would be consistent with the existing land use and zoning designations. Therefore, the project would be consistent with the growth projections and would not conflict with implementation of the RAQS.

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related emissions include fugitive dust from grading activities, equipment exhaust, trips, and power consumption. Construction emissions for the project were modeled assuming that construction would begin in 2022 and last for approximately 18 months. Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters are not available at this time. However, CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys, performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District, of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters. Table 2 shows the total projected construction maximum daily emission levels for each criteria pollutant (RECON 2021a).

Table 2 Summary of Worst-case Construction Emissions (pounds per day)						
Construction	Pollutant					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Site Preparation	3	33	20	<1	21	12
Grading	4	39	30	<1	11	5
Building Construction/Architectural Coatings	34	19	22	<1	2	1
Paving	1	10	15	<1	1	1
Maximum Daily Emissions	**34**	**39**	**30**	**<1**	**21**	**12**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

Source: RECON 2021a
ROG = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide;
SO_X = oxides of sulfur; PM_{10} = particulate matter with an aerodynamic diameter of 10 microns or less;
$PM_{2.5}$ = particulate matter with an aerodynamic diameter of 2.5 microns or less

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

Operations emissions generated by the project would come from area and energy sources (consumer products, landscape maintenance, architectural coatings, natural gas use, etc.), as well a mobile source (vehicle traffic). The project would generate a total of 1,462 average daily trips (ADT; Linscott, Law & Greenspan, Engineers [LLG] 2021). The default trip length was used to model emissions associated with trips generated by the office portion of the project. Because the warehouse portion of the project would include trucks that would travel further distances than employees, a longer trip length of 40 miles was modeled. Table 3 provides a summary of the operational emissions generated by the project (RECON 2021a). As shown, project-generated emissions are projected to be less than the City's Significance Determination Thresholds (City of San Diego 2016) for all criteria pollutants. Therefore, project operation would not generate regional emissions that would exceed the NAAQS or CAAQS or contribute to existing violations, and impacts would be less than significant.

Table 3 Summary of Project Operational Emissions (pounds per day)						
	Pollutant					
Source	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	6	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	11	17	135	<1	35	9
Total	**17**	**17**	**135**	**<1**	**35**	**10**
Significance Threshold	*137*	*250*	*550*	*250*	*100*	*67*

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

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The project does not include sensitive receptors. Additionally, no existing sensitive receptors are located within the vicinity of the project site. The project site is in an industrial area surrounded by other industrial developments. The nearest sensitive receptors are residential uses located approximately 4 miles to the west and Fire-Rescue Department Station 43 is located approximately 1.1 mile to the northwest. Therefore, the project is not anticipated to result in the exposure of sensitive receptors to substantial levels of pollution, and impacts would be less than significant.

The project does not include any uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. The project proposes the operation of a warehouse and office, which is not included on CARB's list of facilities that are known to be prone to generate odors. During operation of the project, odors could be emitted from trucks maneuvering on-site and idling at the proposed loading docks. However, all trucks would be required to comply with CARB's idling limit of five minutes, and these trucks would not produce a significant amount of odor. Consistent with City requirements, all project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Further, there are no sensitive receptors in the vicinity of the project site. Therefore, the project is not expected to generate significant objectionable odors affecting a substantial number of people, and impacts would be less than significant.

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

Biological Resources

OMCPU Final PEIR

Section 5.4 of the OMCPU Final PEIR provides an analysis of biological resource impacts associated with the OMCP. The OMCPU Final PEIR stated that implementation of the OMCP has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing

development adjacent to the MHPA. Potential impacts to federal or state listed species, MSCP covered species, or species with a California Native Plant Society Rare Plant Ranking would be significant. In addition, the OMCPU Final PEIR concluded that future projects would be required to implement project level mitigation measures consistent with its mitigation framework measure BIO-1, which requires site-specific biological surveys to determine the potential for sensitive species, along with the provision for the proposal for site-specific mitigation, if necessary, to reduce impacts to sensitive species or habitats. Specifically, OMCPU Final PEIR mitigation framework measure BIO-1 requires future projects to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl (*Athene cunicularia*; BUOW) habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed. Measures to avoid and minimize impacts to BUOW shall be included in a conceptual BUOW mitigation plan, which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts. Implementation of the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

The OMCPU Final PEIR concluded that future development, including construction or extension of OMCP Mobility Element roadways, utility lines, and/or temporary construction activities within the MHPA, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss, and/or fragmentation. Any direct or indirect impacts to migratory wildlife nesting, foraging, and movement was determined to be significant. The OMCPU Final PEIR determined that potential impacts to migratory wildlife nesting, foraging, and movement within the MHPA would be mitigated through compliance with the MHPA Land Use Adjacency Guidelines implemented through mitigation framework measure LU-2. Implementation of this mitigation measure would ensure impacts would be less than significant. However, because the project is not located adjacent to the MHPA, mitigation framework measure LU-2 would not apply.

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

The OMCPU Final PEIR identified potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because any adjustments would be required to meet the equivalency criteria for approval. The OMCPU Final PEIR determined that MHPA adjacency impacts would be addressed at the project-level, and projects adjacent to MHPA areas would be required to comply with the MHPA Land Use Adjacency Guidelines and implement mitigation measure LU-2, which would reduce MHPA adjacency impacts to a level less than significant. The OMCPU Final PEIR also determined that the OMCP would be consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact and the OMCP incorporates policies for adhering to the Management Directives, and no significant impacts relating to MSCP consistency would occur.

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

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

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

Project

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Biological Technical Report was prepared by Alden Environmental, Inc. (Alden 2021a). Alden performed searches of CDFW's California Natural Diversity Database and the U.S. Fish and Wildlife Service (USFWS) database for information regarding sensitive species known to occur within approximately two miles of the parcel. Alden also conducted vegetation mapping, a Quino checkerspot butterfly (*Euphydryas editha quino*) habitat assessment, a breeding season survey for the burrowing owl, spring and summer 2020 sensitive plant surveys, and jurisdictional delineation of waters of the U.S., waters of the State, and City wetlands. Historic aerials also were reviewed for the site.

Review of historic aerial imagery determined that the project site consists of land that was in agricultural production from 1953 to approximately 1981 and was left fallow from 1982 through the present. Airway Road was constructed along the southern border of the project site from 1986 to 1988, which included grading to the full roadway width and adjacent slopes. Subsequently, grading during construction of SR-905 from 2008 to 2009 impacted the eastern portion of the project site, which included additional clearing and construction along Airway Road. Following completion of SR-905, the cleared and graded areas on and adjacent to the project site were seeded with a native seed mix for erosion control purposes (as opposed to mitigation).

No sensitive plant species were observed on the project site. All sensitive and MSCP Narrow Endemic plant species that were not observed are either not expected or have low potential to occur. Therefore, impacts to sensitive plant species are not anticipated. The project site supports

two wetland communities, four upland vegetation communities, and two land cover types. Table 4 presents the acreages of these wetlands, vegetation communities, and land cover types.

Table 4
Existing Vegetation Communities within the Project Survey Area

Vegetation Communities (Oberbauer 2008)	Acreage
Wetlands	
Disturbed Emergent Wetland	0.65
Mule Fat Scrub	0.03
Wetlands Subtotal	**0.68**
Uplands	
Disturbed broom baccharis scrub (Tier II)	0.09
Non-Native Grassland (Tier IIIB)	6.33
Ornamental (Tier IV)	0.34
Disturbed (Tier IV)	6.78
Non-Native Vegetation (No Tier)	0.17
Developed (No Tier)	0.46
Uplands Subtotal	**14.17**
TOTAL	**14.85**

Source: Alden 2021

The entire 14.85-acre project site would be directly and permanently impacted. Table 5 presents the impact acreages on the project site. According to the City's Biology Guidelines (City of San Diego 2018), lands designated as Tier IV are not considered to have significant habitat value, and impacts would not be considered significant. Therefore, mitigation would not be required. According to the City's Biology Guidelines (City of San Diego 2018), lands containing Tier II and Tier IIIB habitats are considered sensitive and declining. Therefore, impacts to 0.09 acre of Tier II Disturbed broom baccharis scrub and 6.33 acres of Tier III-B non-native grassland would be considered significant and require mitigation. Implementation of mitigation measure MM-BIO-1 Non-Native Grassland would reduce this impact to a level less than significant. MM-BIO-1 would be consistent with OMCPU Final PEIR mitigation framework measure BIO-1. Project mitigation would also impact 0.06 acre of non-native grassland and tamarisk scrub (no tier) habitat at the 1.36-acre off-site mitigation location through conversion to wetland habitat. However, this impact at the mitigation site would not be considered significant since it is for mitigation purposes and would result in the conversion to high-quality wetland habitat.

Table 5 Impacts to Existing Vegetation Communities within the Survey Area	
Vegetation Communities (Oberbauer 2008)	Impact Acreage
Wetlands	
Disturbed Emergent Wetland	0.65
Mule Fat Scrub	0.03
Uplands	
Disturbed broom baccharis scrub (Tier II)	0.09
Non-Native Grassland (Tier IIIB)	6.33
Ornamental (Tier IV)	0.34
Disturbed (Tier IV)	6.78
Non-Native Vegetation (No Tier)	0.17
Developed (No Tier)	0.46
TOTAL	**14.85**
Source: Alden 2021.	

The project site was determined to have minimal potential for the Quino checkerspot butterfly during the habitat assessment. The BUOW, which is considered to have low potential to occur, was not found nor was evidence of BUOW use/occupation of the site found. One sensitive animal species, southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), was observed in the northwestern portion of the project site. The project would impact ornamental plantings along the California Department of Transportation (Caltrans) access easement on the western portion of the site. Despite including native coastal sage scrub plant species, this area of the project site occurs in narrow strips and is marginal habitat for the species. While the species was observed on project site, it is more likely to be utilizing the adjacent off-site vegetated SR-905 slope areas that are much larger and provide a more contiguous vegetation community for this species. Furthermore, the southern California rufous-crowned sparrow is covered by the MSCP because 61 percent (over 73,600 acres) of potential habitat (including 71 percent of mapped localities) would be conserved. Therefore, the project would not adversely affect this species long-term survival and impacts to its potential marginal habitat would be less than significant.

The northern harrier (*Circus hudsonius*) has moderate potential to occur at the project site. The removal of non-native grassland on site would result in a loss of potential northern harrier foraging and nesting habitat. Northern harrier is designated as a State Species of Special Concern because it is experiencing declining population levels, limited ranges, and/or continuing threats have made it vulnerable to extinction. However, it is covered by the MSCP, because 42 percent of its potential nesting habitat and over 85,000 acres of its potential foraging habitat would be conserved. Therefore, the project would not adversely affect this species long-term survival and impacts to its potential habitat would be less than significant.

The California horned lark (*Eremophila alpestris actia*) has moderate potential to occur at the project site. The removal of non-native grassland on site would result in a loss of potential California horned lark foraging and nesting habitat. The California horned lark is on the State Watch List because it was previously a State Species of Special Concern due declining population levels, limited ranges, and/or continuing threats have made it vulnerable to extinction but has since been removed. Therefore, the

project would not adversely affect this species long-term survival and impacts to its potential habitat would be less than significant.

The San Diego black-tailed jackrabbit (*Lepus californicus*) is a State Species of Special Concern. Impacts to the San Diego black-tailed jackrabbit would occur from habitat removal and potential injury or mortality to very young jackrabbit litters that may be immobile during construction activity. The San Diego black-tailed jackrabbit is a State Species of Special Concern. Therefore, impacts to this species, including habitat loss and potential injury or mortality to very young jackrabbit litters, would be considered significant and require mitigation. Implementation of mitigation measure MM-BIO-1 Non-Native Grassland and MM-BIO-2 Biological Resource Protection During Construction would reduce this impact to a level less than significant. MM-BIO-1 and MM-BIO-2 would be consistent with OMCPU Final PEIR mitigation framework measure BIO-1.

As shown in Table 5 above, the project would impact 0.68 acre of City wetlands consisting of 0.65 acre of disturbed emergent wetland and 0.03 acre of mule fat scrub habitats, which would be considered significant and require mitigation.

The Environmentally Sensitive Lands Regulations (ESL), Section §143.0141) require that wetlands be avoided, with unavoidable impacts minimized to the maximum extent practicable. The project would impact City wetlands and a deviation under the Biologically Superior Options (BSO) may be requested to achieve a superior biological result, which would provide a net increase in quality and viability (functions and value) relative to existing conditions or the project originally proposed by the Applicant, and long-term biological benefit. It was demonstrated that the project would be the biologically superior and the California Department of Fish and Wildlife (CDFW) and Unites States Fish and Wildlife Service (USFWS) provided concurrence with the biologically superior design and analysis for impacts to wetland resources on November 24, 2021 and January 21, 2022, respectively.

Implementation of mitigation measure MM-BIO-3 Habitat Mitigation and Monitoring Plan and MM-BIO-4 Wetland Habitat Resource Management Plan would reduce this impact to a level less than significant. MM-BIO-3 and MM-BIO-4 would be consistent with OMCPU Final PEIR mitigation framework measure BIO-4.

Habitat mitigation under MM-BIO-3 would be located at a site is located approximately 1.7 miles northeast of the project site. An unnamed drainage flows through the mitigation site from the southeast to the northwest (approximately 1.5 miles to the Otay River). The drainage has been piped, culverted, and channelized approximately 2,000 feet upstream. The mitigation site was dry-land farmed and supports two non-native vegetation communities (tamarisk scrub and non-native grassland) and dirt roads.

Unlike the project site, where the wetlands are surrounded by development, the mitigation site sits in a canyon with a large buffer, and its watershed is mostly undeveloped. Additionally, the mitigation site is part of a larger wetland preserve system that connects to the Otay River Valley. Therefore, the mitigation site has greater functions, values, and long-term viability potential than the project site wetlands.

The site is considered suitable as mitigation because of the presence of appropriate topography, hydrology, and existing riparian wetland/riparian features (tamarisk scrub). The site is within the historic limits of a tributary to Johnson Canyon and the Otay River and supports area for successful expansion (establishment) of native wetland habitat. There are two approved wetland habitat restoration projects (TM 5549 and TPM 21140 projects) immediately upstream from the Sanyo Logistics Center mitigation site. In addition, the mitigation site is within a larger, interconnected area of conserved and publicly owned lands. The mitigation effort would contribute to regional open space preserve design.

A standalone Habitat Mitigation and Monitoring Plan (HMMP) has been prepared to present the wetland habitat mitigation approach. The HMMP includes an evaluation of the functions and services of the wetlands on site, a 5-year maintenance and monitoring period, and success criteria. A separate Wetland Habitat Resource Management Plan (Alden 2021) also has been prepared to direct the long-term management of the site after successful completion of the mitigation effort. The mitigation site is not currently protected or preserved. It would be protected by recordation of an open space easement prior to approval of the grading permit for the Sanyo Logistics Center project.

Establishment

A total of 0.68 acre of establishment would occur in areas that are adjacent to the mapped jurisdictional area along the center of the channel. The establishment area would be subject to grading for the purpose of widening the drainage/channel, improving hydrological conditions, and creating a gain in wetlands. This expanded area will be planted with native wetland species. The establishment area would increase wetland habitat and also would meet the minimum 1:1 no-net loss requirement.

Rehabilitation

A total of 0.68 acre of rehabilitation would occur in existing wetlands (tamarisk scrub) at the mitigation site. This area would be subject to grading, removal of weeds (including tamarisk), trash, and other deleterious materials from the area. This area also would be seeded and planted with native wetland habitat species. This mitigation-associated impact would be permanent; however, it would not require additional compensatory mitigation because the area would remain as wetland and be rehabilitated to improve overall functions.

Impacts to City wetland habitats require a deviation from the wetland regulations as outlined in Section IV of the City's Biology Guidelines (2018). Therefore, the Biological Technical Report (Alden 2021) evaluated potential impacts to wetlands under the Biologically Superior Option as previously discussed. In accordance with the City's Biology Guidelines, the following alternatives were developed and evaluated to determine the Biologically Superior Option:

- No Project Alternative: This alternative would result in no development and avoidance of all 0.68 acre of City wetlands on-site.

- 100% Avoidance Alternative: This alternative would completely avoid the City wetlands on the site by developing two separate pads on the west and east sides of the wetland features.

- Minimized Impact Alternative: This alternative would develop most of the site and avoid approximately 0.27 acre of the disturbed emergent wetland habitat on the northern end of the drainage. Impacts to wetlands would be mitigated off site.

- Biologically Superior Alternative: The project evaluated throughout this EIR Addendum that would impact all of the City wetlands (0.68 acre) on the project site and would be mitigated off-site.

The Biological Technical Report (Alden 2021) determined that the wetlands on-site are highly disturbed, surrounded by existing development, have limited buffers, and have a watershed that consists almost entirely of stormwater runoff through the City's stormwater system. The project would directly impact all 0.68 acre of these low-quality City wetlands through conversion to impervious surfaces. The project proposes to establish and rehabilitate wetlands at an off-site location (see mitigation measure MM-BIO-3)[1]. The mitigation would occur at a 2:1 ratio, resulting in 1.36 acres of high-quality wetland habitat.

Although wetland impacts on the project site would occur in the Lower Cottonwood Creek watershed, the mitigation would occur within the adjacent Otay River watershed, since there is no suitable or available location remaining within the project's watershed for wetland mitigation. Therefore, the mitigation site is located approximately 1.7 miles northeast of the project site.

Unlike the project site where the wetlands are surrounded by development, the mitigation site is located within a canyon with a large buffer, and its watershed is mostly undeveloped. Additionally, the mitigation site is part of a larger wetland preserve system that connects to the Otay River Valley. Consequently, the mitigation site has greater functions, values, and long-term viability potential than the project site wetlands. Therefore, the project is the Biologically Superior Alternative.

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

MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. The project site is not within or immediately adjacent to the MHPA. No impact would occur.

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

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[1]The terms establishment and rehabilitation are used because the project requires permits from the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and CDFW, and the agencies use those terms. The City's Biology Guidelines (City of San Diego 2018) use the terms creation and enhancement, respectively. The terms have the same meanings and are interchangeable for this document.

Historical Resources

OMCPU Final PEIR

Section 5.5 of the OMCPU Final PEIR provides an analysis of historical resource impacts associated with the OMCP. The OMCPU Final PEIR determined that future development would have the potential to significantly impact all or a portion of the previously identified recorded prehistoric or historic sites within the OMCP area. The OMCPU Final PEIR stated that future discretionary development projects that could result in a potentially significant impact to archaeological resources, as well as religious or sacred sites, and would be required to implement mitigation framework measure HIST-1 to address impacts associated with archaeological resources. Although the OMCPU Final PEIR determined that there are no known human remains in the OMCPU area, human remains may exist below the ground surface that could be unearthed during future development. Unearthing of unknown human remains would be considered a significant impact. The OMCPU Final PEIR stated that future discretionary projects that would have the potential to impact religious or sacred sites or human remains would be required to implement mitigation framework measure HIST-1.

Project

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Historical Resources Survey was prepared by RECON (RECON 2021b). A records search with a one-mile radius buffer around the project site was completed at the South Coastal Information Center at San Diego State University in order to determine if previously recorded prehistoric or historic cultural resources occur on the project area. Historic aerial photographs were reviewed to determine changes in the survey area over time.

The records search indicated that there have been numerous cultural resource investigations that have included the project site. Sixty cultural resources occur with a one-mile radius of the project, including 48 prehistoric resources (24 of which are isolated artifacts), 6 historic resources, 3 multi-component resources, and 3 with no data recorded. The prehistoric resources consist of lithic scatters and lithic scatters with ground stone. The historic resources consist of a roadway, agricultural complex, dam, foundations, and a cistern. The three multicomponent sites are lithic scatters that also exhibit historic foundations and trash scatters. No previously recorded cultural resources occur on the project property.

CA-SDI-12337 is located immediately adjacent to the area of potential effect. CA-SDI-12337 includes four previously recorded sites, CA-SDI-5352, 9974, 10072, and -10735. These four sites were combined, possibly by Mary Robbins-Wade in 2002 as part of the proposed 80-acre Lin project, or by Carolyn Kyle in 1995 as part of the Otay Mesa Road Widening project. The current CA-SDI-12337 covers over 700 acres. Different portions of what is now CA-SDI-12337 have been tested in the past for various specific development projects, and these tests have determined the site lacks subsurface deposits and was not a significant historical resource under City criterion. The most recent survey of the property within CA-SDI-12337 by Robbins-Wade in 2007 determined that although the site was an "important" resource under San Diego County guidelines, the research potential of the site had been fulfilled through the several previous testing programs of portions of the site.

A letter was sent to the NAHC on July 28, 2020, requesting them to search their Sacred Lands File to identify spiritually significant and/or sacred sites or traditional use areas in the project vicinity. A response letter from the NAHC was received on July 30, 2020, indicating the results of the Sacred Lands File search for the project site was negative. The NAHC provided a list of twenty Native American contacts who may have an interest in the project. On March 31, 2021, RECON sent letters to these twenty contacts informing them of the project and inquiring whether they would have any concerns regarding Native American issues or interests. As of the response deadline of April 14, 2021, only one response was received. The Viejas Band of Kumeyaay Indians determined that the project area has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the area of potential effect of the project. Therefore, the Viejas Band requested that a Kumeyaay cultural monitor be on site for ground disturbing activities and to be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

The project site was also surveyed on July 30, 2020, by RECON archaeologist Harry Price, who was accompanied by Native American monitor Justin Linton of Red Tail Environmental. Two isolated artifacts were identified during the field survey. 9743-ISO-1 is a fine-grained metavolcanic core. It is unifacially flaked and measures 65 by 63 by 35 millimeters. 9743-ISO-2 is a fine-grained metavolcanic tool measuring 60 by 52 by 26 millimeters. Both were located in areas cleared of vegetation. Cultural isolates are not considered significant historical resources, because they generally lack characteristics that would qualify them for listing on the CRHR. Additionally, isolates are also not considered significant cultural resources under City guidelines. Therefore, the two isolates found during the survey are not historical resources under the CRHR or the City's inventory requirements. No other cultural material was identified during the survey. However, the majority of the project site was covered in dense vegetation that hindered the possible observance of surface cultural material. Additionally, the proximate location of CA-SDI-12,337 suggests the potential presence of cultural resources. Therefore, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. The project would implement mitigation measure MM-HIST-1 Archaeological Monitoring, as detailed in the MMRP, to reduce impacts related to archaeological resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure HIST-1.

There are no historic buildings, structures, and objects on the project site. Therefore, OMCPU Final PEIR mitigation framework measure HIST-2 would not apply. No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken.

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

Health and Safety/Hazardous Materials

OMCPU Final PEIR

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

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

The OMCPU Final PEIR determined that impacts associated with hazardous sites would be potentially significant. Section 5.6.1.2 of the OMCPU Final PEIR identified six sites within the OMCPU area as containing hazardous materials, which would present a significant hazard to the public or the environment. None of these sites are located within or adjacent to the project site. In addition, the OMCPU Final PEIR determined that the presence of unknown hazardous sites within the OMCP could result in significant impacts to future development within the OMCP area. The mitigation framework contained in the OMCPU Final PEIR included measure HAZ-3, which would reduce potential hazardous site impacts to a level less than significant.

Project

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

Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is not located within a safety zone. The project site is located within the Airport Influence Area-Review Area 2 for Brown Field Municipal Airport, and within the FAA Part 77 Notification Area for Brown Field Municipal Airport. The project buildings' maximum height of 35 feet would not exceed applicable height limits for these zones and would not create a hazard related to air navigation. Therefore, the project would not result in a safety hazard for people working within a designated airport influence area, and impacts would be less than significant.

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

City staff review of the State Water Resources Control Board Geotracker and Department of Toxic Substances Control Envirostor databases determined that there are no contaminated sites on or adjacent to the project site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. Therefore, the project would not be located on a site listed on a hazardous materials database, and impacts would be less than significant.

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

Hydrology and Water Quality

OMCPU Final PEIR

Section 5.7 of the OMCPU Final PEIR provides an analysis of hydrology and water quality impacts associated with the OMCP. The OMCPU Final PEIR identified impacts associated with runoff that would result in significant direct and indirect impacts due to an increase in impervious surfaces and associated increases in runoff, and the alterations of on- and off-site drainage patterns. The mitigation framework contained in the OMCPU Final PEIR included measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual. Future projects would be required to implement this measure and would reduce impacts associated with runoff to a level less than significant.

The OMCPU Final PEIR determined that impacts to natural drainage systems would be potentially significant, as buildout in accordance with the OMCP has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. The OMCPU Final PEIR mitigation framework included measure HYD/WQ-1, which requires regulatory compliance

with the Storm Water Standards Manual, would reduce impacts to natural drainage systems to a level less than significant.

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

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

Project

Consistent with the OMCPU Final PEIR mitigation framework and City regulations, a site-specific Storm Water Quality Management Plan (SWQMP) and Preliminary Drainage Study were completed by K&S Engineering (K&S; 2021a and 2021b).

There are currently no storm drain facilities on the property, and existing on-site drainage consists of natural and sheet flows from south to north. Off-site drainage enters the project site from two locations: Airway Road from Avenida De Las Americas to west of Sanyo Avenue and the Otay International Center detention basin located south of Airway Road. The SWQMP determined that development of the project would convert 11.85 acres (80 percent) of the project site to impervious surfaces (K&S Engineering 2021a). In order to address this increase of impervious surfaces, the project would install one biofiltration basin for the purpose of water quality, hydromodification, and peak flow detention in the northwest portion of the project site. This biofiltration basin would be located within a flood storage easement that would be dedicated to the City for maintenance purposes. The project would install four green street bioswales to provide source control of stormwater, limit stormwater transport, and pollutant conveyance to the public storm drain system on Sanyo Avenue and Airway Road. The project would also introduce an underground system of 48-inch reinforced concrete storm drainpipes and inlets to convey runoff from south to north. These facilities would be located within a 20-foot-wide storm drain easement that would be dedicated to the City. Off-site flows from the south would be intercepted by a proposed storm drain and bypassed across the project site through the underground system of pipes to the project's point of compliance in the northwestern portion of the project site.

The Preliminary Drainage Report documented that project would reduce flow rates under the 5-, 10-, 25-, and 50-year storm events as follows:

- Reduce the 5-Year flow rate from 11.3 cubic feet per second (cfs) in the existing condition to 2.6 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 13.4 cfs in the existing condition to 8.8 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 14.9 cfs in the existing condition to 14.6 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 17.3 cfs in the existing condition to 14.7 cfs in the post-project condition (K&S Engineering 2021b).

Additionally, the project would retain the existing drainage pattern and install a large riprap/energy dissipater at the project's point of compliance that would reduce the stormwater velocity traversing the project site from 10.1 feet per second (fps) in the existing condition to 3.7 fps in the post-project condition. Therefore, the project would not result in a substantial increase in runoff, substantial alteration of on-site or off-site drainage patterns, or off-site erosion and sedimentation, and impacts would be less than significant.

According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). Two infiltration tests were conducted which determined that the average infiltration rate was 0.012 inch per hour. Based on the results of the field infiltration tests, full or partial infiltration should be considered infeasible (K&S 2021a). Therefore, the project proposes a biofiltration basin in the northwest portion of the project site and four green street bioswales along the project frontages with Sanyo Avenue and Airway Road. The SWQMP identified six Drainage Management Areas (DMAs). DMA 1 would consist of the majority of the project site where the two multi-tenant industrial distribution buildings and paved parking areas would be constructed. DMA 1 would drain to the biofiltration basin proposed in the northwest portion of the project site. DMA 2 would consist of an approximately 15,564 square-foot area within the southwestern portion of the project site that would remain completely pervious, would be a self-mitigating, and would drain westward. Therefore, no BMP would be required for DMA 2. DMAs 3 and 4 would be located along the project frontage with Sanyo Avenue and would each drain to a green street bioswale. DMAs 5 and 6 would be located along the project frontage with Airway Road and would each drain to a green street bioswale. As described above, the project would reduce peak flows under the 5-, 10-, 25-, and 50-year storm event compared to the existing condition, and the project would prevent off-site erosion or sedimentation by retaining the existing on-site drainage pattern. Additionally, the site-specific SWQMP prepared by K&S Engineering (2021a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual. Therefore, the project would not result in increases in pollutant discharges, including downstream sedimentation, and impacts would be less than significant.

As described in the biological resources section above, the project would impact 0.68 acre of low-quality City wetlands. The project proposes to establish and rehabilitate wetlands at an off-site location at a 2:1 ratio, resulting in 1.36 acres of high-quality wetland habitat (see mitigation measure MM-BIO-3). Therefore, the project would obtain permits from the Regional Water Quality Control Board and ACOE under Federal Clean Water Act Section 401 or 404, respectively. As described in the biological resources section above, the wetlands on-site are highly disturbed, surrounded by existing development, have limited buffers, and have a watershed that consists almost entirely of stormwater runoff through the City's stormwater system. Therefore, the wetlands that would be impacted on-site do not consist of a natural drainage feature with connectivity to a larger wetland resource. The mitigation site on the other hand, is located within a canyon with a large buffer, and its watershed is mostly undeveloped, and is part of a larger wetland preserve system that connects to the Otay River Valley. Therefore, mitigation measure MM-BIO-3 would create new wetlands that are of higher quality than those that would be impacted by the project. Furthermore, project runoff would not affect a navigable waterway, and no additional permitting from the Regional Water Quality Control Board and ACOE under Federal Clean Water Act Section 401 or 404 beyond those associated with wetlands would be required.

The project site is located approximately 11.0 miles inland from the coast, with elevations ranging from approximately 527 to 561 feet above mean sea level. Therefore, the risk of tsunami is negligible due to the distance from the ocean and elevation. There would be no risk from a seiche, as the site is not located near a large body of water, such as a lake.

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

Geology/Soils

OMCPU Final PEIR

Section 5.8 of the OMCPU Final PEIR provides an analysis of geology and soils impacts associated with the OMCP. The OMCPU Final PEIR determined that the OMCPU is within a moderate to high geologic risk area and could therefore result in the exposure of persons or structures to seismic events associated with fault. Faults within the immediate OMCPU area are generally considered to comprise the La Nación Fault Zone. Faults in this zone are considered to be potentially active and would subject the OMCP area to moderate to severe ground shaking, resulting in a potentially significant impact. Regarding compressible soils, the OMCPU Final PEIR determined that portions of the OMCP area are underlain by undocumented fill, colluvium/topsoil, and alluvium, which are typically lose, dry, and contain rubble and are considered compressible. For future projects underlain by compressible soils, removal and replacement by compacted fill would be required. Regarding expansive soils, the OMCP area contains clay mudstone strata within the Very Old Paralic Deposits that exhibit a high to very high expansion potential, which occur over the majority of the OMCP area, resulting in a potentially significant impact. No significant impacts were identified for potential rockfall hazards, and no rock stabilization or blasting would be required for future projects within the OMCP area. The OMCPU Final PEIR mitigation framework included measure GEO-1, which requires preparation of a site-specific geotechnical report recommending project-specific engineering design measures that would reduce potential geologic hazard impacts to a level less than significant.

The OMCPU Final PEIR determined that impacts associated with erosion would be potentially significant, due to the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the OMCP area, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys. The OMCPU Final PEIR mitigation framework included measure GEO-2, requires preparation of a site-specific geotechnical report to ensure that projects adhere to the Grading Regulation and National Pollutant Discharge Elimination System permit requirements. Implementation of this measure would reduce impacts associated with erosion to a level less than significant.

Project

Consistent with the OMCPU Final PEIR mitigation framework measure GEO-1 and City regulations, a site-specific Geotechnical Investigation was prepared for the project by GEOCON, Inc. (GEOCON 2020). Review of the City's *Seismic Safety Study, Geologic Hazards and Faults*, 2008 Edition, Sheet 4, determined that the project site is designated as Hazard Category 53: *Level or Sloping Terrain, unfavorable geologic structure, low to moderate risk*. The Geotechnical Investigation determined that the project site is not underlain by an active fault and is not located within an Earthquake Fault Zone. Therefore, the risk associated with fault rupture is considered low. Site topography is gently to moderately sloping, with elevations ranging from 527 to 561 feet above mean sea level. Additionally, review of published geologic maps during preparation of the Geotechnical Investigation determined there were no mapped landslide areas on or near the project site. Therefore, risks associated with landslides are considered low. The Geotechnical Investigation also determined that risk associated with liquefaction is considered low due to the dense nature of soils underlying the project site, lack of permanent shallow groundwater, and proposed grading. Therefore, impacts associated with these geologic hazards would be less than significant.

The Geotechnical Investigation determined that the majority of soils within the upper three to six feet below existing site grades are expected to possess high to very high expansion potential. Therefore, the Geotechnical Investigation recommended that the project should implement select grading to create a 5-foot-thick cap of low- to medium-expansive soil. In order to obtain select capping material, the Geotechnical Investigation recommended mining the underlying very low- to medium-expansive Otay Formation that is suitable for site capping, in combination with burial of the expansive topsoil in mined areas. Adherence to this recommendation would ensure that impacts related to expansive soils would be reduced to a level less than significant.

Based on the results of the Geotechnical Investigation, the soils and geologic conditions potentially affecting the site have been adequately addressed that construction on the site would be feasible. Additionally, the project would be required to comply with all recommendations presented in the Geotechnical Investigation. Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential impacts related to geologic hazards would be reduced to a level less than significant.

Regarding erosion, the site-specific SWQMP prepared by K&S Engineering (2021a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual. Therefore, impacts related to erosion would be less than significant.

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

Energy Conservation

OMCPU Final PEIR

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

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

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

The CCR, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance are the California Building Code energy efficiency and green building standards (CALGreen). The CCR, Title 24, Part 6 is the Energy Efficiency Standards. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The current version of the Energy Code, known as the 2019 Title 24, or the 2016 Energy Code, became effective January 1, 2020. The CCR, Title 24, Part 11 is known as CALGreen. CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

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

The City's CAP outlines the actions that the City will undertake to achieve its proportional share of state GHG emissions reductions. The CAP includes strategies to reduce citywide GHG emissions. Strategies 1 through 3 are relevant to energy conservation. Strategy 1, Water & Energy Efficient

Buildings, includes goals and actions to reduce building energy consumption. Strategy 2, Clean & Renewable Energy, includes goals and actions to achieve 100 percent renewable energy citywide by 2035. Strategy 3, Bicycling, Walking, Transit & Land Use, includes goals and strategies to increase the use of mass transit, increase bicycling and walking opportunities, reduce vehicle fuel consumption, and promote effective land use patterns to reduce vehicle miles traveled. Note that the City had not yet adopted a CAP when the OMCPU was approved.

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

Project

Energy used during construction of the project would not be considered significant given the short-term nature of the energy consumption. In regard to long-term operational related energy consumption, the project would be consistent with the land use and zoning designations analyzed in the OMCPU Final PEIR, and development of the project would not result in any new or more severe impacts related to electrical power or fuel consumption in comparison to what was previously analyzed. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy and would not result in a need for new electrical systems or require substantial alteration of existing utilities.

Construction of the project would consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. However, all equipment would be required to meet CARB Tier 3 In-Use Off-Road Diesel Engine Standards. Engines are required to meet certain emission standards, and groups of standards are referred to as Tiers. A Tier 0 engine is unregulated with no emission controls, and each progression of standard level (i.e., Tier 1, Tier 2, Tier 3, etc.) generate lower emissions, use less energy, and are more advanced technologically than the previous tier. CARB's Tier 3 In-Use Off-Road Diesel Engine Standards requires that construction equipment fleets become cleaner and use less energy over time. Section 5.9 of the OMCPU Final PEIR determined that there are no known conditions within the planning area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical fuel

consumption rates. Due to the gently to moderately sloping topography and undeveloped nature of the project site, construction of the project would be consistent with this conclusion. Therefore, the project would not result in the use of excessive amounts of fuel or other forms of energy (electricity or natural gas) during construction, and impacts would be less than significant.

The project would be required to meet the mandatory energy requirements of CALGreen and the version of the California Energy Code (Title 24, Part 6 of the California Code of Regulations) that is in effect at the time building permits are obtained. The current version of the Energy Code, known as 2019 Title 24, or the 2019 Energy Code, became effective January 1, 2020. The 2019 Energy Code provides mandatory energy efficiency measures as well as voluntary tiers for increased energy efficiency. Each version of the Energy Code is more energy efficiency than previous versions. The project would be required to comply with Policies 4.9-1 through 4.9-5 of the Community Plan Urban Design Element described in the discussion of the OMCPU Final PEIR above, which contains a list of climate change and sustainable development policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design.

The project would be required to meet the mandatory energy standards of the California Energy Code, Title 24 Building Energy Standards of the California Code of Regulations, which would be demonstrated through completion of Energy Code compliance forms required to obtain building permits. These measures are related to all aspects of building construction including the building envelop, mechanical systems, electrical systems, plumbing, etc. The project would also be required to comply with the policies of the Community Plan Urban Design Element as well as the energy conservation requirements of the CAP Checklist. The project would be consistent with the applicable CAP Consistency Checklist standards related to energy, including utilization of cool/green roofs, installation of electric vehicle charging stations, bicycle parking and shower facilities, designation of parking spaces for low-emitting, fuel-efficient, and carpool/vanpool vehicles, and transportation demand management. Refer to the CAP Consistency Checklist for a detailed discussion of how the project would implement design features consistent with these measures (RECON 2020b). Additionally, the project would be served by San Diego Gas & Electric, which currently has an energy mix that includes 39 percent renewable energy (California Public Utilities Commission 2020) and is on track to achieve 60 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Therefore, the project would not result in the use of excessive amounts of energy, create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency, and impacts would be less than significant.

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

Noise

OMCPU Final PEIR

Section 5.10 of the OMCPU Final PEIR provides an analysis of noise impacts associated with the OMCP. The OMCPU Final PEIR determined that impacts associated with traffic noise would be significant, as noise sensitive land uses are proposed in areas where exterior noise levels would exceed the noise and land use compatibility standards established in Table N-3 of the General Plan.

Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate 805, SR-905, SR-125, Otay Mesa Road, and Airway Road. The OMCPU Final PEIR mitigation framework included measures NOI-1 and NOI-2 that would be required by future projects to demonstrate the exterior and interior noise levels for residential uses would not exceed the compatibility standards of the City's General Plan. These measures required site-specific exterior and interior noise analyses to identify site-specific noise attenuating measures; however, even with implementation of these measures, because the effectiveness of project-level noise reduction measures cannot be known at the program level, the OMCPU Final PEIR determined that traffic noise resulting from implementation of the OMCP would not be compatible with the General Plan standards.

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

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

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

Project

The primary noise source in the vicinity of the project site is vehicular traffic on adjacent and nearby roadways from SR-905, SR-11, Airway Road, and Sanyo Avenue. The site is also exposed to aircraft noise levels less than 60 dB(A) CNEL from operations associated with Brown Field Municipal Airport

(i.e., outside the 60 CNEL contour). Other existing ambient noise levels at the project site consist of activities and equipment at adjacent industrial properties. Based on the noise level measurements taken as a part of the OMCPU Final PEIR, ambient noise levels in Otay Mesa ranged from 61.5 to 80.9 dB(A) L_{eq}. Ambient noise levels adjacent to Airway Road in the vicinity of the project were measured to be 72.6 dB(A) L_{eq}.

OMCPU Final PEIR mitigation framework measures NOI-1 and NOI-2 do not apply to the project because they are related to noise exposure to residential uses and sensitive receptors, and the project does not include any sensitive receptors. Therefore, a site-specific acoustical analysis was not required for the project. Mitigation framework measure NOI-3 applies to noise-generating commercial and industrial uses sited near noise-sensitive uses (i.e., residential). However, this measure does not apply to the project since the project site is not located in, near, or in close proximity to a sensitive receptor. In order to reduce potentially significant impacts associated with construction noise, the OMCPU Final PEIR mitigation framework included measures NOI-4 (and LU-2) requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan.

However, the project is required to comply with the land use compatibility standards in Table NE-3 of the General Plan, and construction and operational noise level limits specified in the Noise Abatement and Control Ordinance.

Construction Noise

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

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

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

Construction would be restricted to between the hours of 7:00 a.m. and 7:00 p.m., and construction noise levels may not exceed a 12-hour equivalent noise level [dB(A) $L_{eq(12)}$] of 75 dB(A) $L_{eq(12)}$ as assessed at or beyond the property line of a property zoned residential. There are no residential properties located in the vicinity of the project site. The nearest sensitive receptors are residential uses located approximately 4 miles to the west and Fire-Rescue Department Station 43 is located approximately 1.1 miles to the northwest. Construction noise levels at these distances would not

exceed 75 dB(A) $L_{eq(12)}$ and would not be audible over the existing ambient noise levels dominated by vehicle traffic. Therefore, construction noise impacts would be less than significant.

On-Site Generated Noise

In regard to stationary source noise, the main operational noise sources within the project site are anticipated to be those that would be typical of industrial and warehouse uses, and would include trucks accessing the project site, idling, and loading docks, truck unloading and loading activities, and mechanical ventilation equipment. Stationary sources of noise generated on a project site are regulated by the City's Noise Abatement and Control Ordinance. Section 59.5.0401 of the City's Noise Abatement and Control Ordinance states that:

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

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

The applicable noise limits of the City's Noise Abatement and Control Ordinance are summarized in Table 6.

Table 6
Applicable Noise Level Limits

Land Use	Time of Day	One-Hour Average Sound Level [dB(A) L_{eq}]
Single-family Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	50 45 40
Multi-family Residential (up to a maximum density of 1 unit/2,000 square feet)	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	55 50 45
All other Residential	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	60 55 50
Commercial	7:00 a.m. to 7:00 p.m. 7:00 p.m. to 10:00 p.m. 10:00 p.m. to 7:00 a.m.	65 60 60
Industrial or Agricultural	Anytime	75
SOURCE: City of San Diego Noise Abatement and Control Ordinance Section 59.5.0401. dB(A) L_{eq} = A-weighted decibels equivalent noise level		

The project proposes an industrial land use and is located adjacent to other industrial land uses. The applicable property line noise level limit between project site and the adjacent industrial uses is 75 dB(A) L_{eq} at any time.

The project would be similar to the surrounding industrial uses and would generate noise levels similar to the existing surrounding environment. Furthermore, there are no project components

that are anticipated to generate noise levels that would exceed 75 dB(A) L_{eq} at the property line. Therefore, the project would not generate on-site noise that would exceed the noise limits established in the City's Noise Abatement and Control Ordinance, and impacts would be less than significant.

Vibration

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

Project construction equipment used during site grading and excavation would have the greatest potential to generate vibrations that would affect nearby uses. Construction equipment would include equipment such as loaded trucks, excavators, dozers, and loaders. Vibration levels from these pieces of equipment would generate vibration levels with a peak particle velocity (PPV) ranging from 0.035 to 0.089 inches per second (in/sec) PPV at 25 feet. Human reaction to vibration is dependent on the environment the receiver is in as well as individual sensitivity. For example, vibration outdoors is rarely noticeable and generally not considered annoying. Typically, humans must be inside a structure for vibrations to become noticeable and/or annoying. Based on several federal studies the threshold of perception is 0.035 in/sec PPV, with 0.24 in/sec PPV being a distinctly perceptible (Caltrans 2013). Neither cosmetic nor structural damage of buildings occurs at levels below 0.1 in/sec PPV. The nearest structure is located approximately 95 feet south of the project boundary. There are no structures within 25 feet of the project site; therefore, vibration levels would be below the distinctly perceptible threshold. Thus, groundborne vibration impacts from construction would be less than significant. Once operational, the project would not be a source of groundborne vibration.

Land Use Adjacency

In Table NE-3 of the General Plan, warehouse uses are "compatible" with exterior noise levels up to 65 CNEL, and "conditionally compatible" with exterior noise levels up to 75 CNEL. In "conditionally compatible" areas, feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable and building structures must attenuate exterior noise levels to specified indoor noise levels. The interior noise level standard for office uses is 50 CNEL, and there is no interior noise level standard for warehouse because they are not considered a noise sensitive use. Additionally, based on the City's CEQA Significance Thresholds, the traffic noise significance threshold at exterior useable space is 75 CNEL for industrial uses. The project does not include any exterior sensitive use areas. Based on the vehicle traffic noise contours calculated in the OMCPU Final PEIR, the proposed building would be located outside the 75 CNEL contours for vehicle traffic on nearby roadways. These contours do not take into account shielding that would be provided by the proposed building. Therefore, the project would be compatible with the City's 75 CNEL standard for industrial/warehouse uses, and impacts would be less than significant.

The proposed offices would be located within the proposed warehouse buildings. As discussed above, the buildings are located outside the 75 CNEL contour line. There is no interior noise level standard for warehouse uses and the offices would be an ancillary use to the warehouse. However, as a conservative assessment, noise levels within the offices were compared to the interior noise level standard of 50 CNEL. Assuming light-frame construction, interior noise levels would be reduced by 25 dB(A) from exterior noise levels. Because the offices would be located outside the 75 CNEL noise contour, this 25 dB(A) reduction would result in interior noise levels that are less than 50 CNEL. Therefore, interior noise levels in the commercial buildings would be compatible with City's interior noise standard of 50 CNEL, and impacts would be less than significant.

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

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

Paleontological Resources

OMCPU Final PEIR

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

Project

Review of Figure 5.11-1 of the OMCPU Final PEIR determined that the project site is located within an area identified as being underlain by San Diego Formation (Tsd) and Otay Formation (To), which have been designated as having a high sensitivity level for paleontological resources. Additionally, the site-specific Geotechnical Investigation (GEOCON 2020) conducted borings that determined that the site is underlain by Otay Formation (To). The project would require 19,380 cubic yards of cut to a depth of 10 feet from mass grade to finish grade, which would exceed the City's established significance threshold for a project requiring excavation within an area identified as having a high paleontological sensitivity rating. Therefore, the project would have the potential to impact paleontological resources. The project would implement mitigation measure MM-PALEO-1 Paleontological Monitoring, as detailed in the MMRP, to reduce impacts related to paleontological resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure PALEO-1.

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

Transportation/Circulation

OMCPU Final PEIR

Section 5.12 of the OMCPU Final PEIR provides an analysis of transportation/circulation impacts associated with the OMCP. The OMCPU Final PEIR determined that impacts to the circulation system would be significant. Specifically, a total of 24 roadway segments under the Horizon Year Plus OMCPU condition would be expected to operate at unacceptable level of service, resulting in significant roadway segment impacts. A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus OMCPU condition, resulting in significant intersection impacts, and impacts at 39 intersections would remain significant after mitigation. The OMCPU Final PEIR determined that all Interstate 805 freeway segments studied would be expected to operate at an acceptable level of service in the Horizon Year Plus OMCPU condition, while five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus OMCPU condition, resulting in a significant impact at these five SR-905 freeway segments. In regard to freeway ramp metering impacts, the OMCPU Final PEIR determined that five SR-905 metered freeway on-ramps would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition, resulting in a significant impact.

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

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

The OMCPU Final PEIR identified significant impacts at 49 intersections throughout the OMCP area. The OMCPU Final PEIR mitigation framework included measure TRF-1, which requires intersection improvements per the lane designations identified in the OMCPU Final PEIR Figures 5.12-4a through 5.12-4g. However, the OMCPU Final PEIR concludes that even with the lane configurations proposed

for the intersections analyzed, impacts at 39 intersections would continue to be significant and unmitigated.

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

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

Project

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Access Analysis was completed by LLG (LLG 2021). The following is a brief summary of the analysis and conclusions of the technical study.

Methodology

Potential traffic impacts were analyzed using the *Highway Capacity Manual 6th Edition (HCM 6)*, with the assistance of the *Synchro 10* computer software and compared to the City Level of Service (LOS) criteria for intersections and roadway segments. The project is consistent with the land uses that were analyzed in the OMCPU Final PEIR. Therefore, the Access Analysis analyzed impacts based on LOS criteria, since that is the CEQA standard that was utilized in the OMCPU Final PEIR.

Project Trip Generation

The project would develop 232,969 square feet of warehouse and distribution and 10,000 square feet of office space. Based on these proposed land use types, the Access Analysis estimated project trip generation based on rates for "warehousing" and "commercial office" found in the City's *Trip Generation Manual* (City of San Diego 2003). As shown in Table 7, the project would generate approximately 1,462 ADT, with 214 trips (158 inbound/56 outbound) during the AM peak hour and 229 trips (83 inbound/146 outbound) during the PM peak hour.

Table 7 Project Trip Generation													
		Daily Trip Ends (ADTs)		AM Peak Hour					PM Peak Hour				
Land Use	Size (KSF)	Rate[a]	Volume	% of ADT	In: Out Split	Volume In	Volume Out	Volume Total	% of ADT	In: Out Split	Volume In	Volume Out	Volume Total
Ware-housing	232.969	5/KSF	1,165	15%	70: 30	123	52	175	16%	40: 60	75	112	187
Commercial Office	10.00	Log formula[b]	297	13%	90: 10	35	4	39	14%	20: 80	8	34	42
Total		—	1,462	—	—	158	56	214	—	—	83	146	229

KSF = 1,000 square feet
[a]Rate is based on City of San Diego's Trip Generation Manual.
[b]Ln (ADT) = 0.756 Ln (KSF) +3.95

Impact Analysis

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

Intersections:

1. La Media Road/SR-905 westbound ramps
2. La Media Road/SR-905 eastbound ramps
3. La Media Road/Airway Road
4. Sanyo Avenue/Otay Mesa Road
5. Sanyo Avenue/Project Driveway (north) (Does not exist)
6. Sanyo Avenue/Airway Road
7. Airway Road/Harvest Road
8. Airway Road/Project Driveway (west) (Does not exist)
9. Airway Road/Project Driveway (east) (Does not exist)

Roadway Segments:

1. La Media Road
    - SR-905 westbound ramps/St. Andrews Avenue to SR-905 eastbound ramps
    - SR-905 eastbound ramps to Airway Road
2. Sanyo Avenue
    - Otay Mesa Road to Project Driveway (north)
    - Project Driveway (north) to Airway Road
3. Otay Mesa Road
    - Harvest Road to Sanyo Avenue
4. Airway Road
    - La Media Road to Harvest Road
    - Harvest Road to Project Driveway (west)
    - Project Driveway (west) to Project Driveway (east)
    - Project Driveway (east) to Sanyo Avenue

Therefore, existing (Year 2019) traffic volumes were developed for the project based on a methodology that utilized historical traffic counts and was coordinated with City Transportation Development staff.

Existing Plus Project

All intersections in the Existing Plus Project scenario would operate at LOS D or better.

All roadway segments in the Existing Plus Project scenario would operate at LOS D or better with the exception of three roadway segments. The project would result in a significant direct impact to the following three roadway segments:

- La Media Road, from SR-905 eastbound ramps to Airway Road (LOS E)
- Airway Road, from Project Driveway (west) to Project Driveway (east) (LOS F)
- Airway Road, from Project Driveway (east) to Sanyo Avenue (LOS E)

Opening Year 2022 Plus Project

This scenario evaluated potential impacts based on the addition of project traffic in the Opening Year 2022 conditions.

All intersections in the Opening Year 2022 Plus Project scenario would operate at LOS D or better.

All roadway segments in the Opening Year 2022 Plus Project scenario would operate at LOS D or better with the exception of three roadway segments. The project would result in a significant impact to the following three roadway segments that were also impacted in the Existing Plus Project scenario:

- La Media Road, from SR-905 eastbound ramps to Airway Road (LOS F)
- Airway Road, from Project Driveway (west) to Project Driveway (east) (LOS F)
- Airway Road, from Project Driveway (east) to Sanyo Avenue (LOS F)

Consistent with the OMCPU Final PEIR, the project would include mitigation measure MM-TRA-1 and MM-TRA-2, as detailed in the MMRP, for direct impacts under the Existing Plus Project and Opening Year 2022 Plus Project scenarios to the roadway segments listed above. Implementation of MM-TRA-1 and MM-TRA-2 would reduce these impacts to a level less than significant. These mitigation measures would be consistent with the OMCPU Final PEIR mitigation framework regarding impacts on roadway segments. Mitigation measure MM-TRA-1 has already been proposed as part of the Airway Logistics Center Project (PTS #665589). The Airway Logistics Center Project is anticipated to complete this improvement, which would reduce the project's impact to a level less than significant. If the additional northbound lane is not first constructed by the Airway Logistics Center Project, the project will construct this improvement to reduce the impact to a level less than significant.

Active Transportation

No sidewalk currently exists along the project frontage with Airway Road. A contiguous sidewalk currently exists along the project frontage with Sanyo Avenue. As a part of the project frontage

improvements, the project would provide half-width improvements to meet the ultimate classification of a 4-lane Major on Airway Road and 4-lane Collector with a two-way left-turn lane on Sanyo Avenue per the current Street Design Manual. These frontage improvements would include a 22-foot parkway on Airway Road, which would consist of a 6-foot non-contiguous sidewalk and a 16-foot landscape buffer. These frontage improvements would also include a 14-foot parkway on Sanyo Avenue that would consist of a 5-foot non-contiguous sidewalk and a 9-foot landscape buffer.

No bicycle facilities are currently provided along the project frontage with Airway Road. Bike Lanes are provided on both sides of Sanyo Avenue between Otay Mesa Road and Airway Road. The project would provide half-width improvements to accommodate the ultimate classification of Airway Road and Sanyo Avenue that would include buffered bike lanes on the north side of Airway Road and west side of Sanyo Avenue.

The following bust stops are located near the project site:

- Bus stops for San Diego Metropolitan Transit System (MTS) Route 909 are located on both sides of Sanyo Avenue, south of Otay Mesa Road and on both sides of Heinrich Hertz Drive at Neils Bohr Court. Route 909 provides service between Southwestern Higher Education Center Otay Mesa and the Otay Mesa Transit Center. Weekday service begins at 5:05 a.m. with 1-hour headways and ends at 7:46 p.m.

- A bus stop for MTS Route 905 is also located on west side of La Media Road at the SR-905 eastbound ramps intersection. Route 905 provides service between the Iris Avenue Transit Center and Otay Mesa Transit Center. Weekday service begins at 4:10 a.m. with 30-minute headways and ends at 10:00 p.m.

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

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

Public Services

OMCPU Final PEIR

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

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

The OMCP Final PEIR stated that buildout of the OMCPU would place additional demands on school services and additional school facilities would be required to meet the needs of the OMCP buildout. As discussed in the OMCPU Final PEIR, the construction of these facilities would take place within the development footprint of the plan area and be subject to separate environmental review at the time design plans are available. The OMCPU Final PEIR determined that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with the OMCPU would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. Therefore, impacts associated with future school facilities were determined to be less than significant.

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

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

Project

The project would develop an industrial use consistent with the land use and zoning designations identified in the OMCP. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future fire protection that was analyzed in the OMCPU Final

PEIR. Therefore, the project would not result in development beyond that anticipated under the OMCP and would not increase the demand for fire protection within the service area. Furthermore, the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future fire protection facilities. The project would not require any new or expanded fire protection facilities, and impacts would be less than significant.

The project would develop an industrial use consistent with the land use and zoning designations identified in the OMCP. Consequently, the project would be consistent with growth projections that were utilized to forecast future police protection demand that was analyzed in the OMCPU Final PEIR. Therefore, the project would not result in development beyond that anticipated under the OMCP and would not increase the demand for police protection within the service area. Although the project could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the project due to its consistency with future development projections for the OMCP. Moreover, ongoing funding for police services is provided by the City General Fund, and the project would pay Development Impact Fees prior to building permit issuance, which would be used to maintain and fund future police protection facilities. Therefore, the project would not require any new or expanded police protection facilities, and impacts would be less than significant.

The project is limited to development of an industrial use with ancillary office space and would not construct any housing that could result in an increase in population beyond what was anticipated by the OMCP. The project would be consistent with the land use and zoning designations identified in the OMCP. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future school services, park and recreation facilities, libraries, and other public services that were analyzed in the OMCPU Final PEIR. Therefore, the project would not require construction of additional infrastructure beyond what was anticipated in the OMCP that could induce growth. Therefore, the project would not result in population growth that could increase demand for school services, park and recreation facilities, libraries, or other public services. No impact would occur.

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

Public Utilities

OMCPU Final PEIR

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

The OMCPU Final PEIR concluded that impacts associated with water and reclaimed water utility systems would be less than significant, as improvements to these systems had been previously identified in master planning documents, including Otay Water District's (OWD) 2008 Water Resources Master Plan and 2010 Water Resources Master Plan Update and the City's Public Utilities Department (PUD) Otay Mesa Master Plan Optimization Baseline Report, and would be required regardless of whether the OMCP was implemented. The OMCPU Final PEIR determined that impacts

associated with wastewater would be less than significant, as the 2004 Otay Mesa Trunk Sewer Master Plan and 2009 Refinement Report previously identified sewer system improvements as required in future phases to accommodate buildout wastewater generation from the area. The three additional improvements identified within the OMCP would occur within existing utility line easements and facilities and would not result in significant impacts to the environment.

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

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

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

Project

Water and Wastewater

The project would connect to an existing 16-inch PVC sewer main and a 12-inch water pipe the currently traverse Airway Road, which would be adequate to serve the needs of the project. The connections to these sewer and water facilities would be located within the project footprint. Therefore, potential impacts associated with construction of these sewer and water facilities have been evaluated throughout this EIR Addendum. The project would develop an industrial use consistent with the land use and zoning designations identified in the OMCP. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for sewer and water service that was analyzed in the OMCPU Final PEIR. Therefore, the project would not increase demand for sewer and water service within the service area that would necessitate construction of new off-site facilities, and impacts would be less than significant.

Reclaimed Water

The Retail Alternative would develop commercial uses consistent with the land use and zoning designations identified in the OMCPU. Consequently, the Retail Alternative would be consistent with growth projections that were utilized to forecast demand for future reclaimed water that was analyzed in the OMCPU Final PEIR. Therefore, the Retail Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for reclaimed water within the service area.

Solid Waste

Consistent with the OMCPU Final PEIR mitigation framework measure UTIL-1, a site-specific WMP was prepared for the project by RECON (RECON 2020a). The project site is currently undeveloped and would not require demolition requiring disposal. The project would require a net import of approximately 80,374 cubic yards of soil, and all green waste would be recycled for 100 percent diversion during grading. The WMP estimated that approximately 527.2 tons waste of waste would be generated during construction, approximately 439.3 tons of which would be diverted. This would result in the diversion and reuse of approximately 83.3 percent of construction waste, which would meet the City's current waste diversion goal of 75 percent. The WMP determined that operation of the project would generate approximately 1,368.2 tons of waste per year. The project would include two 480-square-foot refuse storage and recycling areas, and the applicant (or applicant's successor in interest) would implement the ongoing waste reduction measures documented in the WMP to ensure that project operation would comply with applicable City recycling ordinances and that waste would be minimized. Implementation of the Waste Reduction Measures documented in the WMP would reduce operational impacts related to solid waste to a level less than significant.

Stormwater Infrastructure

As described in the hydrology and water quality section above, there are currently no storm drain facilities on the property, and existing on-site drainage consists of natural and sheet flows from south to north. Off-site drainage enters the project site from two locations: Airway Road from Avenida De Las Americas to west of Sanyo Avenue and the Otay International Center detention basin located south of Airway Road. The SWQMP determined that development of the project would convert 11.85 acres (80 percent) of the project site to impervious surfaces (K&S Engineering 2021a). In order to address this increase of impervious surfaces, the project would install one biofiltration basin for water quality, hydromodification, and peak flow detention in the northwest portion of the project site. This biofiltration basin would be located within a flood storage easement that would be dedicated to the City for maintenance purposes. The project would install four green street bioswales to provide source control of stormwater, limit stormwater transport and pollutant conveyance to the public storm drain system on Sanyo Avenue and Airway Road. The project would also introduce an underground system of 48-inch reinforced concrete storm drainpipes and inlets to convey runoff from south to north. These storm water facilities would be located within a 20-foot-wide storm drain easement that would be dedicated to the City within the project footprint. Off-site flows from the south would be intercepted by a proposed storm drain and bypassed across the project site through the underground system of pipes to the project's point of compliance in the northwestern portion of the project site.

The Preliminary Drainage Report documented that project would reduce flow rates under the 5-, 10-, 25-, and 50-year storm events as follows:

- Reduce the 5-year flow rate from 11.3 cfs in the existing condition to 2.6 cfs in the post-project condition.
- Reduce the 10-year flow rate from 13.4 cfs in the existing condition to 8.8 cfs in the post-project condition.
- Reduce the 25-year flow rate from 14.9 cfs in the existing condition to 14.6 cfs in the post-project condition.
- Reduce the 50-year flow rate from 17.3 cfs in the existing condition to 14.7 cfs in the post-project condition (K&S Engineering 2021b).

Additionally, the project would retain the existing drainage pattern and install a large riprap/energy dissipater at the project's point of compliance that would reduce the stormwater velocity traversing the project site from 10.1 fps in the existing condition to 3.7 fps in the post-project condition. Therefore, the project would not require the construction of off-site stormwater infrastructure facilities.

According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project. Therefore, a SWQMP was prepared to identify and implement required structural BMPs for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). Two infiltration tests were conducted which determined that the average infiltration rate was 0.012 inch per hour. Based on the results of the field infiltration tests, full or partial infiltration should be considered infeasible (K&S 2021a). Therefore, the project proposes a biofiltration basin in the northwest portion of the project site and four green street bioswales along the project frontages with Sanyo Avenue and Airway Road. The SWQMP identified six DMAs. DMA 1 would consist of the majority of the project site where the two multi-tenant industrial distribution buildings and paved parking areas would be constructed. DMA 1 would drain to the biofiltration basin proposed in the northwest portion of the project site. DMA 2 would consist of an approximately 15,564-square-foot area within the southwestern portion of the project site that would remain completely pervious, would be a self-mitigating, and would drain westward. Therefore, no BMP would be required for DMA 2. DMAs 3 and 4 would be located along the project frontage with Sanyo Avenue and would each drain to a green street bioswale. DMAs 5 and 6 would be located along the project frontage with Airway Road and would each drain to a green street bioswale. As described above, the project would reduce peak flows under the 5-, 10-, 25-, and 50-year storm event compared to the existing condition, and the project would prevent off-site erosion or sedimentation by retaining the existing on-site drainage pattern. Additionally, the site-specific SWQMP prepared by K&S Engineering (2021a) documented that the project would be required to prepare a SWPPP that would implement construction BMPs consistent with the performance standards documented in the City's Storm Water Standards Manual. Therefore, the project would not result in increases in pollutant discharges, including downstream sedimentation, and impacts would be less than significant.

As described in the biological resources section above, the project would impact 0.68 acre of low-quality City wetlands. The project proposes to establish and rehabilitate wetlands at an off-site location at a 2:1 ratio, resulting in 1.36 acres of high-quality wetland habitat (see mitigation measure MM-BIO-3). Therefore, the project would obtain permits from the Regional Water Quality Control

Board and ACOE under Federal Clean Water Act Section 401 or 404, respectively. As described in the biological resources section above, the wetlands on-site are highly disturbed, surrounded by existing development, have limited buffers, and have a watershed that consists almost entirely of stormwater runoff through the City's stormwater system. Therefore, the wetlands that would be impacted on-site do not consist of a natural drainage feature with connectivity to a larger wetland resource. The mitigation site on the other hand, is located within a canyon with a large buffer, and its watershed is mostly undeveloped, and is part of a larger wetland preserve system that connects to the Otay River Valley. Therefore, mitigation measure MM-BIO-3 would create new wetlands that are of higher quality than those that would be impacted by the project. Furthermore, project runoff would not affect a navigable waterway, and no additional permitting from the Regional Water Quality Control Board and ACOE under Federal Clean Water Act Section 401 or 404 beyond those associated with wetlands would be required. Therefore, construction of stormwater infrastructure would not result in any environmental impacts that have not been evaluated throughout this EIR Addendum, and impacts would be less than significant.

Communications Systems

The project site is located in an urbanized area of the city with existing communication services. The project would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future communications systems that was analyzed in the OMCPU Final PEIR. Site-specific connections to existing communications infrastructure would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, communications services connections would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant.

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

Water Supply

OMCPU Final PEIR

Section 5.15 of the OMCPU Final PEIR determined that impacts on water supply associated with buildout of the OMCP would be less than significant. The City PUD prepared a Water Supply Assessment (WSA) for the OMCPU Final PEIR that determined sufficient water supply would be available to serve existing demands, project demands of the OMCP, and future water demands within the City PUD and OWD service area in normal and dry year forecasts during a 20-year projection.

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

Project

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

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

Population and Housing

OMCPU Final PEIR

Section 5.16 of the OMCPU Final PEIR provides an analysis of population and housing impacts associated with the OMCP. The OMCPU Final PEIR determined that impacts associated with population growth would be less than significant, as the OMCP would implement SANDAG's Regional Comprehensive Plan and Regional Housing Element and the City's General Plan and Housing Element by providing a mix of housing types within mixed-use centers linked to public transportation, increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast, and focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the Regional Comprehensive Plan and General Plan goals and policies. The OMCP provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist, resulting in a less than significant impact.

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

Project

The project is limited to development of an industrial use with ancillary office space and would not construct any housing that could result in an increase population beyond that anticipated in the OMCP. The project would be consistent with the land use and zoning designations identified in the OMCP and would not require construction of additional infrastructure beyond what was anticipated in the OMCP that could induce growth. Therefore, the project would not result in substantial population growth or growth inducement. No impact would occur.

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

Agricultural and Mineral Resources

OMCPU Final PEIR

Section 5.17 of the OMCPU Final PEIR provides an analysis of agricultural and mineral resource impacts associated with the OMCP. The OMCPU Final PEIR determined that impacts associated with the conversion of agricultural land would be less than significant. It was determined that although the OMCP would convert additional Important Farmland to non-agricultural uses, these areas are fragmented and are surrounded by urban land uses and MHPA lands, and agricultural viability within the OMCP area has been significantly reduced due to rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts. Agricultural land in the OMCP area is intended as an interim, rather than permanent use. The OMCP allows agriculture as an interim use pending development and would rezone the Central Village to an agricultural "holding" zone to accommodate continued agricultural operations until such time that a Specific Plan is implemented.

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

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

Project

The land use designation is Light Industrial per the OMCP. Review of Figure 5.17-1 of the OMCPU Final PEIR determined that the project site has been designated by the California Department of Conservation Farmland Mapping and Monitoring Program as Other Land. The project site is not in active agricultural use and is surrounded by industrial uses to the south and east, and SR-905 to the west. Land north of the project site is also designated as Other Land. Furthermore, the project site is not designated or zoned for agricultural production in the OMCP. Therefore, the project does not propose the conversion of agricultural land to non-agricultural uses. No impact would occur.

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

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

Greenhouse Gas Emissions

OMCPU Final PEIR

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

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

Project

In the time since the certification of the OMCPU Final PEIR, the City adopted a CAP in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. The GHG emission reduction targets specified in the CAP include a 15 percent reduction in emissions (compared to year 2010 baseline emissions) by 2020, and a 50 percent reduction by year 2035. To achieve these goals, the City has identified the following CAP strategies to reduce GHG: energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist, adopted July 12, 2016, which is the primary document used by the City to ensure a project-by-project consistency with the underlying assumptions in the CAP and thereby to that the specified emission reduction targets identified in the CAP are achieved. Therefore, completion of the CAP Checklist demonstrates consistency with the City's GHG CEQA thresholds to ensure that a project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would be consistent with the CAP (City of San Diego 2016). Based on the most recent CAP Annual Report, in 2017, total GHG emissions were 21 percent below the 2010 baseline (City of San Diego 2018).

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

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

an increased density within a Transit Priority Area. A CAP Consistency Checklist was completed for the project (RECON 2020b) and its consistency is presented below.

Completion of Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the project would be consistent with the existing General Plan and Community Plan land use designation of Light Industrial, as well as the existing zoning designation of Light Industrial (IL-2-1). Therefore, the project would be consistent with the growth projections utilized in the development of the CAP per Step 1(A).

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

- Utilizing roofing materials and plumbing fixtures consistent with the requirements specified in the CALGreen for non-residential buildings.
- Providing 17 electrical vehicle parking spaces, 9 of which would be provided with charging equipment installed ready for use.
- Designating 27 parking spaces for low-emitting, fuel efficient and carpool/vanpool spaces.
- Providing 10 short-term bicycle parking spaces and 14 long-term bicycle parking spaces.
- Providing shower stalls consistent with the requirements specified in CALGreen for non-residential buildings (RECON 2020b).

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

Step 3: Project CAP Conformance Evaluation would only apply if Step 1 is answered in the affirmative under Option B. As previously disclosed above, the project is consistent with the General Plan and community plan and therefore answered in the affirmative to 1A. Thus, Step 3 does not apply to the project.
Based on the project's consistency with the City's CAP Consistency Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs or generate GHG emissions that may adversely affect the environment, and impacts would be less than significant.

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

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

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

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

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

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

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

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

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

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

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

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

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

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

   Qualified Biologist, Qualified Archaeologist, and Native American Monitor

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

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

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) No. 668005 and/or Environmental Document No .668005, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.

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

2. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
   Not Applicable

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

   Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the

private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

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

Document Submittal/Inspection Checklist

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

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources

MM-BIO-1: Non-native Grassland

Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Owner/Permittee shall make payment to the City Habitat Acquisition Fund (HAF) to mitigate for the loss of 6.31 acres of non-native grasslands (Tier IIIB). This fee is based on mitigation ratios, per the City of San Diego Biology Guidelines, of 0.5:1 ratio if mitigation would occur inside of the MHPA and a 1:1 ratio should mitigation occur outside of the MHPA. Therefore, the resulting total mitigation required for direct impacts to non-native grassland (Tier IIIB) shall be 3.16 acre(s) inside the MHPA or 6.31 acre(s) outside the MHPA equivalent monetary contribution into the City's Habitat Acquisition Fund (HAF) plus a 10 percent administrative fee.

MM-BIO-2: Biological Resource Protection During Construction

I. Prior to Construction

A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), 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. **Preconstruction Meeting**: The Qualified Biologist shall attend the preconstruction 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 MMC 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, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); 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 (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), 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 ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. **Avian Protection Requirements:** To avoid any direct impacts to the southern California rufous-crowned sparrow, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of southern California rufous-crowned sparrow on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The survey area shall cover the limits of disturbance and 300 feet from the area of disturbance. The applicant shall submit the results of the pre-construction survey to City Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting southern California rufous-crowned sparrow, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of the southern California rufous-crowned sparrow or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting southern California rufous-crowned sparrow) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

G. **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 southern California rufous-crowned sparrow and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, 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 BCME. 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 (CSVR). The CSVR shall be e-mailed to MMC 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.

B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access). If active nests of the northern harrier or western burrowing owl 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 Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state, and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

MM-BIO-3: Habitat Mitigation and Monitoring Plan

Impacts to 0.65 acre of disturbed emergent wetland and 0.03 acre of mule fat scrub are proposed to be mitigated at a 2:1 ratio per table 2A of the City's Biology Guidelines (City of San Diego 2018). The mitigation would include habitat establishment and rehabilitation (1.36 acres total) on a mitigation site in Johnson Canyon located on Otay Mesa in San Diego County.

I. Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to NTP or issuance for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including mitigation of direct impacts to 0.65 acre of disturbed emergent wetland and 0.03 acre of mule fat scrub have been shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the Habitat Mitigation and Monitoring Plan prepared by Alden Environmental, Inc (Alden 2021b), the requirements of which are summarized below.

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (July 2002). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120 day plant establishment

period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:

a. The RMC shall be responsible for the maintenance of the *wetland* mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a *weekly* basis throughout the plant establishment period.
b. At the end of the 120-day period the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
c. MMC will provide approval in writing to begin the *five-year* long-term establishment/maintenance and monitoring program.
d. Existing indigenous/native species shall not be pruned, thinned or cleared in the revegetation/mitigation area.
e. The revegetation site shall not be fertilized.
f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.
g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.
h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the *five-year* maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.

4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone and notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City of San Diego Biological Review References. Resumes and the biology worksheet should be updated annually.
2. MMC will provide a letter to the applicant confirming the qualifications of the PQB/PRS/QBM and all City Approved persons involved in the revegetation/restoration plan and biological monitoring of the project.
3 Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.
4. PBQ must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

II. Prior to Start of Construction

A. PQB/PRS Shall Attend Preconstruction (Precon) Meetings

1. Prior to beginning any work that requires monitoring:
   a. The owner/permittee or their authorized representative shall arrange and perform a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.
   b. The PQB shall also attend any other grading/excavation related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM and/or GC.
   c. If the PQB is unable to attend the Precon Meeting, the owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.
2. Where Revegetation/Restoration Work Will Occur
   a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.
   b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME.
3. When Biological Monitoring Will Occur
   a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.
4. PQB Shall Contact MMC to Request Modification
   a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

III. During Construction

A. PQB or QBM Present During Construction/Grading/Planting

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, cleaning, grading, excavation, landscape establishment in association with impacts to 0.68 acre of emergent wetland and 0.03 acre of mule fat scrub which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. **The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible to notify the CM, LA, RE, BI and MMC of the changes.**

2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CSVR's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that of associated with biology).
4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats, as shown on the approved LCD.
6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly
7. The PQB or QBM shall oversee implementation of BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMP's upon completion of construction activities. Removal of temporary construction BMP's shall be verified in writing on the final construction phase CSVR.
8. PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.
9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occurs or sensitive biological resources are discovered that where not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to temporarily divert construction in the area of disturbance or discovery and immediately notify the RE or BI, as appropriate.
2. The PQB shall also immediately notify MMC by telephone of the disturbance and report the nature and extent of the disturbance and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMP's). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.
3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by fax or email with photos of the resource in context (e.g., show adjacent vegetation).

C. Determination of Significance
   1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.
   2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

IV. Post Construction

A. Mitigation Monitoring and Reporting Period
   1. *Five-Year* Mitigation Establishment/Maintenance Period
      a. The RMC shall be retained to complete maintenance monitoring activities throughout the *five-year* mitigation monitoring period.
      b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
      c. Maintenance activities will include all items described in the LCD.
      d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC.
   2. Five-Year Biological Monitoring
      a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
      b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
      c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
      d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
      e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and percent cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.

f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth-year criteria and the irrigation has been terminated for a period of the last two years.
g. The PQB or QBM shall oversee implementation of post-construction BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP's upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

C. Submittal of Draft Monitoring Report
1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include discussion on weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of 120 day period to determine mortality of individuals.
2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the owner, RMC and RIC. Site progress reports shall review maintenance activities, qualitative and quantitative (when appropriate) monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.
3. Draft annual reports (three copies) summarizing the results of each progress report including quantitative monitoring results and photographs taken from permanent viewpoints shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
5. The PQB shall submit revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.
6. MMC will provide written acceptance of the PQB and RE of the approved report.

D. Final Monitoring Reports(s)
1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
a. This report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years.
b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.

c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-BIO-4: Wetland Habitat Resource Management Plan

Consistent with the requirements of the City's Biology Guidelines, the project would implement a Wetland Habitat Resource Management Plan to preserve project wetland mitigation in perpetuity. The Wetland Habitat Resource Management Plan (RMP) prepared by Alden Environmental, Inc. (Alden 2021c) would be implemented once evidence of successful mitigation is provided and signed off on by City staff for mitigation to be completed under MM-BIO-3.

The RMP will address the long-term management of wetland mitigation. The applicant will also establish a non-wasting endowment, or other funding mechanism, for an amount approved by the City based on a Property Analysis Record (PAR) 3 or similar cost estimation method to secure the ongoing funding for the RMP by an agency, non-profit organization, or other entity approved by the City. The applicant will submit the final RMP to the City and transfer the funds for the non-wasting endowment, within 60 days of receiving approval of the revised draft plan.

Historical Resources

MM-HIST-1: Archaeological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

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

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.

3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

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

B. PI Shall Attend Preconstruction (Precon) Meetings
   1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
      a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
   2. Identify Areas to be Monitored
      a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
      b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
   3. When Monitoring Will Occur
      a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
      b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

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

B. Discovery Notification Process
   1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
   2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
   3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
   4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance
   1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
      a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.

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

IV. Discovery of Human Remains

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

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

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

C. If Human Remains ARE determined to be Native American
   1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
   2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
   3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
   4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
    a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;
    b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
    c. To protect these sites, the landowner shall do one or more of the following:
        (1) Record the site with the NAHC;
        (2) Record an open space or conservation easement; or
        (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
    1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
    2. The following procedures shall be followed.
        a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8AM of the next business day.
        b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV–Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
        c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III–During Construction and IV-Discovery of Human Remains shall be followed.
        d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
B. If night and/or weekend work becomes necessary during the course of construction
    1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
    2. The RE, or BI, as appropriate, shall notify MMC immediately.
C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

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

B. Handling of Artifacts

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

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures

were taken to ensure no further disturbance occurs in accordance with Section IV–Discovery of Human Remains, Subsection 5.

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

Paleontological Resources

MM-PALEO-1: Paleontological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check
   1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for 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 Preconstruction (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 11x17) 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 CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process
   1. In the event of a discovery, the 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 8AM 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 8AM 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.

Transportation/Circulation

MM-TRA-1: La Media Road Between SR-905 Eastbound Ramps and Airway Road

Prior to the issuance of any construction permit, the Owner/Permittee shall assure by permit and bond the widening and improvement of La Media Road on the east side by approximately 14 feet to construct a second northbound through lane from Airway Road to approximately 600 feet north of Airway Road, where the road is already widened to three through lanes, satisfactory to the City Engineer. All improvements shall be completed and operational prior to first occupancy.

MM-TRA-2: Airway Road between the Project's westerly driveway and Sanyo Avenue

Prior to the issuance of any construction permit, the Owner/Permittee shall assure by permit and bond the dedication and widening of Airway Road to 38 feet from centerline to curb and provide a 22-foot parkway, with raised median and striping to include westbound travel lanes plus a buffered bike lane, satisfactory to the City Engineer. All improvements shall be completed and operational prior to first occupancy.

As a part of the project frontage improvements, consistent with the Airway Road ultimate classification of a 4-lane Major, per the City of San Diego Street Design Manual, the project is proposing to widen and construct Airway Road along the project frontage by 38 feet from the centerline and provide a 22-foot parkway to provide the ultimate roadway width and cross-section. Full frontage improvements will include the construction of a raised median that will restrict vehicular access to right in/right out only at the westerly driveway along Airway Road. This mitigation will be permitted and bonded prior to the issuance of the first building permit and will be completed and operational prior to the issuance of first occupancy permit, satisfactory to the City Engineer.

VIII. SIGNIFICANT UNMITIGATED IMPACTS

The OMCPU Final PEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the Final PEIR were implemented: land use; biological resources; historical resources; human health/public safety/hazardous materials; hydrology/water quality; geology/soils; and paleontological resources. The Final PEIR further concluded that significant impacts related to air quality, noise, transportation/circulation, utilities, and GHG emissions would not be fully mitigated to below a level of significance. With regard to cumulative impacts, implementation of the OMCPU Final PEIR would result in significant impacts related to air quality, noise, transportation/circulation (horizon year), utilities (solid waste), agriculture resources, and GHG emissions, which would remain significant and unmitigated. As there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the OMCPU Final PEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified Final PEIR, new CEQA Findings and/or Statement of Overriding Considerations are not required.

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

IX. CERTIFICATION

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

E. Shearer Nguyen,
Senior Planner
Development Services Department

February 17, 2022
Date of Final Report

Attachments:

Figure 1: Regional Location
Figure 2: Project Location on Aerial Photograph
Figure 3: Site Plan

REFERENCES

Alden Environmental, Inc. (Alden)

2021a Biological Technical Report for the Sanyo Logistics Center. October 4.

2021b Sanyo Logistics Center Project Habitat Mitigation and Monitoring Plan. August 5.

2021c Wetland Habitat Resource Management Plan for the Sanyo Logistics Center Project. August 5.

California Department of Transportation (Caltrans)

2013 Technical Noise Supplement. November.

California Public Utilities Commission (CPUC)

2020 2020 California Renewables Portfolio Standard Annual Report. November 2020.

GEOCON, Inc. (GECON)

2020 Geotechnical Investigation, Sanyo Logistics Center. August 13.

K&S Engineering

2021a Priority Development Project Storm Water Quality Management Plan, Sanyo Logistics Center. May 10.

2021b Preliminary Drainage Study for Sanyo Logistics Center. October 6.

Linscott, Law & Greenspan, Engineers (LLG)

2021 Access Analysis, Sanyo Logistics Center. May.

RECON Environmental, Inc. (RECON)

2021a Air Quality CalEEMod Emission Calculation Output. July 12.

2021b Results of Historical Resources Survey for the Sanyo Logistics Center Project. June 11.

2020a Waste Management Plan for the Sanyo Logistics Center Project. August 26.

2020b Climate Action Plan Consistency Checklist. November 13.

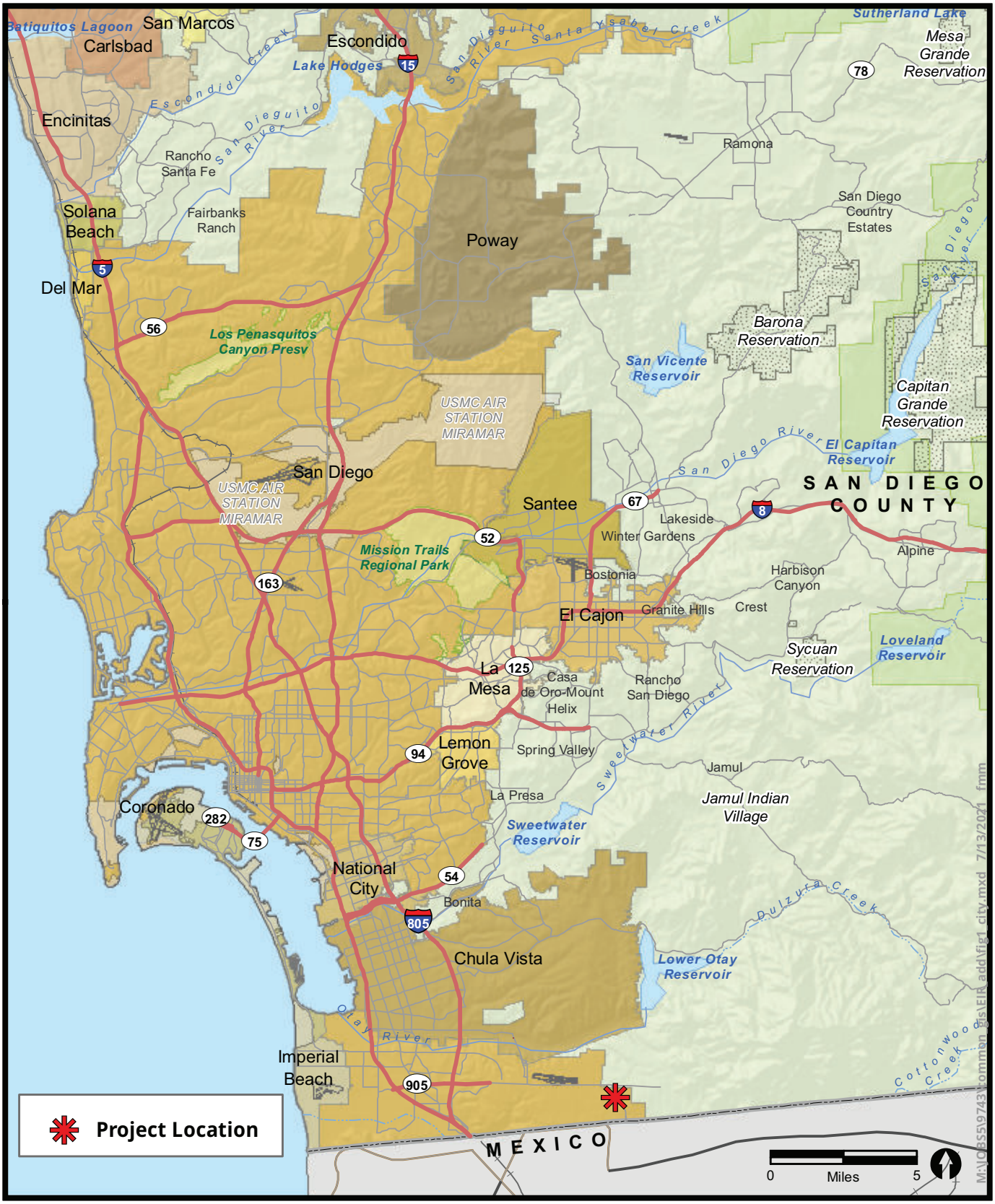
San Diego, City of

2016 California Environmental Quality Act Significance Determination Thresholds. July 2016.

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

2019 2019 Annual Report, Climate Action Plan. Available at https://www.sandiego.gov/sites/default/files/2019_cap_digital_version.pdf.

Figures 1-3



Regional Location

Sanyo Logistics Center/Project No. 668005

City of San Diego – Development Services Department

FIGURE

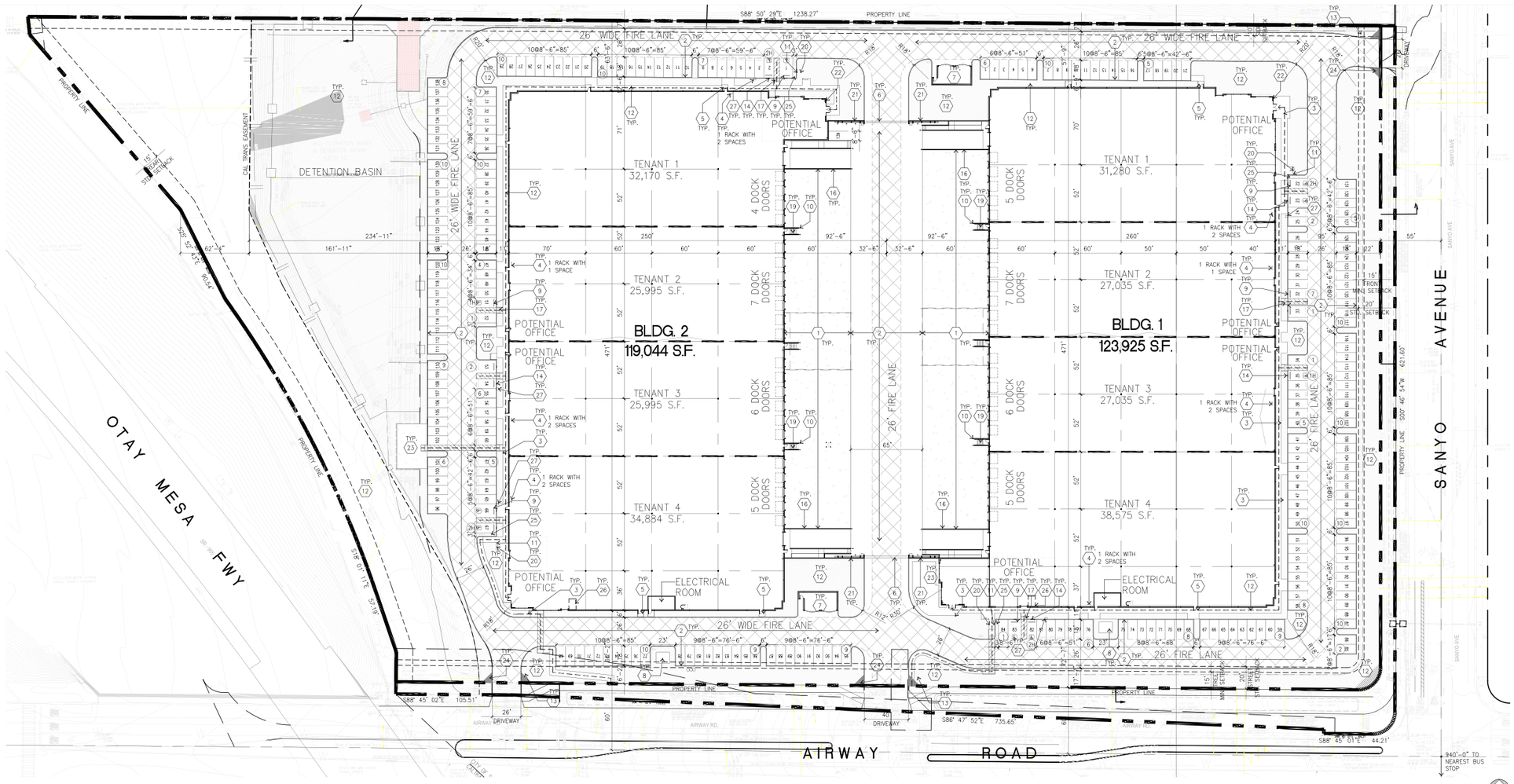
No. 1

Project Location on Aerial Photograph

Sanyo Logistics Center/Project No. 668005

City of San Diego – Development Services Department

FIGURE No. 2



SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONCRETE PAVEMENT.
2. ASPHALT CONCRETE (AC) PAVING.
3. CONCRETE WALKWAY, MEDIUM BROOM FINISH.
4. LONG-TERM BICYCLE RACK.
5. 5'-6"x5'-6"x4" THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH.
6. PROVIDE 8' HIGH METAL GATES W/ KNOX-BOX PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
7. TRASH ENCLOSURE PER CITY STANDARD. SEE DETAIL C/DAB-A4.1.
8. APPROXIMATE LOCATION OF TRANSFORMER.
9. PRE-CAST CONCRETE WHEEL STOP.
10. CONCRETE FILLED GUARD POST "6 DIA. U.N.O. 42" H.
11. DESIGNATED SMOKING AREA.
12. LANDSCAPE. ALL LANDSCAPE AREAS INDICATED BY SHADING.
13. ACCESSIBLE ENTRY SIGN.
14. ACCESSIBLE PARKING STALL SIGN.
15. NOT USED
16. 42" HIGH CONCRETE GUARDWALL.
17. TRUNCATED DOME.
18. NOT USED
19. EXTERIOR CONCRETE STAIR WITH GUARDRAIL AND HANDRAIL
20. SHORT-TERM BICYCLE RACK.
21. 12' HIGH SCREEN WALL.
22. PROVIDE BUILDING ADDRESS NUMBER PER FHPS POLICY P-00-6(UFC 901.4.4)
23. 1,000 SF OUTDOOR PATIO.
24. VISIBILITY TRIANGLES
25. 3' X 8' MOTORCYCLE PARKING STALL.
26. FUTURE SHOWER ROOM
27. EV CHARGER

SITE PLAN GENERAL NOTES

1. THE SITE PLAN BASED ON THE SOILS REPORT PREPARED BY: TBD.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4", FINISH TO BE A MEDIUM BROOM FINISH U.N.O.
11. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
12. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
13. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
14. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
15. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB.
16. ALL WORK PROPOSED IN THE PUBLIC RIGHT-OF-WAY TO BE APPROVED UNDER A SEPARATE PUBLIC RIGHT-OF-WAY PERMIT.
17. NO OBSTRUCTION INCLUDING SOLID WALLS IN THE VISIBILITY AREA SHALL EXCEED 3 FEET IN HEIGHT, PER SDMC SECTION 142.0409 (B)(2), PLANT MATERIAL, OTHER THAN TREES, LOCATED WITHIN VISIBILITY AREAS OR THE ADJACENT PUBLIC RIGHT-OF-WAY SHALL NOT EXCEED 36 INCHES IN HEIGHT, MEASURED FROM THE LOWEST GRADE ABUTTING THE PLANT MATERIAL TO THE TOP OF THE PLANT MATERIAL.
18. ALL PUBLIC IMPROVEMENTS PER CITY STANDARDS. DRIVEWAYS TO FOLLOW COMMERCIAL CONCRETE DRIVEWAY PER SDG-163, PUBLIC SIDEWALKS TO FOLLOW PUBLIC SIDEWALK PER SDG-155, CURB & GUTTER: TYPE G CURB & GUTTER PER SDG-151, PEDESTRIAN CURB RAMP: TYPE A CURB RAMP PER SDG-133. SEE "C" DRAWINGS.

SITE LEGEND

- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- ASPHALT CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (8'-6" X 18')
- ACCESSIBLE PARKING STALL (9' X 18") + 5' W/ ACCESSIBLE AISLE
- ACCESSIBLE PARKING (VAN) STALL (12' X 18') + 5' W/ ACCESSIBLE AISLE
- CLEAN AIR/ VANPOOL PARKING STALL (8'-6" X 18')
- LANDSCAPED AREA
- PATH OF TRAVEL
- 26' FIRE WIDE FIRELANE
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT-APPROXIMATE LOCATION

Site Plan

Sanyo Logistics Center/Project No. 668005

City of San Diego - Development Services Department

FIGURE
No. 3