



THE CITY OF SAN DIEGO

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. 334235
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: La Media Retail North: This EIR Addendum evaluates impacts associated with two alternatives for the La Media Retail North Project: the Retail Alternative and the Industrial Alternative. **The Retail Alternative requests a CONDITIONAL USE PERMIT, VESTING TENTATIVE MAP (VTM), SITE DEVELOPMENT PERMIT (SDP), PLANNED DEVELOPMENT PERMIT, and NEIGHBORHOOD USE PERMIT,** to subdivide one parcel into twelve lots for future development of ten commercial buildings, including 106,700 square feet (sf) of commercial retail, a 13,500 sf pharmacy with drive-through, 6,000 sf of fast-food restaurants with drive-throughs, and a 3,500 sf 12-pump gas station with a convenience store and carwash facility and the installation of two underground storage tanks (USTs), on a vacant 17.6-acre site. The Retail Alternative also proposes to construct public improvements for roads and utilities along the project's frontage. The Retail Alternative is requesting the deviations from the IL-3-1 (Industrial-Light) Zone for street frontage, setback, and reduced lot size. **The Industrial Alternative requests a VTM and SDP** to subdivide one parcel into two lots for future development of two industrial buildings totaling approximately 256,789 sf. The Industrial Alternative would not require any deviations. The project site is located south of Otay Mesa Road, east of La Media Road, and north of State Route 905, and north of Airway Road in the City of San Diego. The project site is in the IL-3-1 Zone of the Otay Mesa Community Plan, Community Plan Implementation Overlay Zone (CPIOZ) A, Very High Fire Hazard Severity Zones, Airport Land Use Compatibility Overlay Zone (Brown Field Municipal Airport [BMA]), Airport Influence Area (Review Areas 1 and 2-BMA), Airport Safety Zone (BMA), and the Federal Aviation Administration (FAA) Part 77 Notification Area (BMA). (Legal Description: Parcel 1 of Parcel Map No. 21010, APN 646-121-34.) Applicant: La Media & Airway, LLC.

I. SUMMARY OF PROPOSED PROJECT

This EIR Addendum evaluates impacts associated with two alternatives for the La Media Project: the Retail Alternative and the Industrial Alternative. The Retail Alternative would be the most impactful, and therefore the main impact analysis focuses on this proposal. This EIR Addendum also includes an evaluation of the Industrial Alternative that describes impacts in relation to the Retail Alternative. Descriptions of the Retail Alternative and Industrial Alternative are provided below.

The Retail Alternative requests a CONDITIONAL USE PERMIT (CUP), a VESTING TENTATIVE MAP (VTM), a SITE DEVELOPMENT PERMIT (SDP), a PLANNED DEVELOPMENT PERMIT (PDP), and a

NEIGHBORHOOD USE PERMIT (NUP), to subdivide one parcel into twelve lots for future development of ten commercial buildings, including 106,700 square feet (sf) of commercial retail, a 13,500 sf pharmacy with drive-through, 6,000 sf of fast-food restaurants with drive-throughs, and a 3,500 sf 12-pump gas station with a convenience store and carwash facility and the installation of two underground storage tanks (USTs), on a vacant 17.6-acre site. The gas station would utilize a 20,000-gallon underground storage tank for liquid gasoline (Class 1B) and a 5,000-gallon underground storage tank for liquid diesel (Class 2). The Retail Alternative also proposes to construct off-site public improvements for roads and utilities at the perimeter (see Figure 1-Regional Location, Figure 2-Project Location and Figure 3-Retail Alternative Site Plan).

To implement the Retail Alternative, the following permits and actions are requested: a CUP to allow for a gas station; a VTM to subdivide the single-parcel property into 12 lots; an SDP to allow large retail (over 100,000 sf) and to comply with Environmentally Sensitive Lands (ESL) regulations detailed in San Diego Municipal Code (SDMC) Section 143.0141 due to potential impacts to non-native grassland on the project site; PDP to allow for deviations from applicable development regulations, per SDMC Section 143.0920(a); and an NUP to establish new uses within the project site, including a gas station, as well as implementation of a comprehensive sign plan. The proposed retail uses would be constructed as stucco and tile buildings with glass windows.

The Retail Alternative is requesting the following deviations from the IL-3-1 (Industrial–Light) Zone:

- Allow Lots 1, 4, and 11 to not front on a public street.
- Allow Lots 1, 2, 3, and 4 to have zero interior setback where 10 feet is required.
- Allow Lot 12 to be 13,000 sf, where a minimum lot area of 15,000 sf is required.

Table 1 presents the development summary of the proposed commercial retail project. Figure 4 shows the proposed lot layout. Eight of the subdivided lots would have a single commercial building each, while Lot 4 would have two commercial buildings. Lot 7 would consist solely of a paved parking area, and Lots 11 and 12 would consist solely of landscaping and bioretention basins. The majority of the project site would consist of a paved parking lot and the retail commercial uses which would include construction of storm drains and infrastructure for water and sewer connections. Lots 1, 2, and 5 would also include covered truck loading docks at the rear of each commercial building, facing State Route 905 (SR-905). Lots 1, 3, and 12 would have a single biofiltration basin each, while Lots 6, 8, 9, and 11 would have dual biofiltration basins each. Additionally, one biofiltration basin would pass through lots 2, 3, 7, 8, 9 and 10. One biofiltration basin would be located on the eastern off-site improvement area located on the Sunroad Otay 50 project site.

| Table 1 Retail Alternative Development Summary | | |
|---|-------|--|
| Lot | Acres | Proposed Use |
| Lot 1 | 4.1 | Grocery – Retail (Building A) |
| Lot 2 | 1.5 | Major – Retail (Building B) |
| Lot 3 | 1.0 | Major – Retail (Building C) |
| Lot 4 | 1.5 | Shops – Retail (Buildings D and E) |
| Lot 5 | 1.6 | Major – Retail (Building F) |
| Lot 6 | 1.6 | Pharmacy with Drive-Through (Building G) |
| Lot 7 | 1.0 | Paved Parking Lot |

| Table 1 Retail Alternative Development Summary | | |
|---|-------------|---|
| Lot | Acres | Proposed Use |
| Lot 8 | 0.8 | Drive-Through Restaurant (Building H) |
| Lot 9 | 1.1 | Drive-Through Restaurant (Building J) |
| Lot 10 | 1.3 | Gas Station with Convenience Store and Carwash (Building K) |
| Lot 11 | 1.3 | Landscaping |
| Lot 12 | 0.3 | Landscaping |
| Total | 17.2 | |
| Note: The remaining 0.4 acre of the project site consists of frontage improvements. | | |

Table 2 provides a summary of the City of San Diego (City's) minimum parking requirements for the Retail Alternative, and the number of parking spaces that would be provided for each use based on parking type. As shown in the table, the Retail Alternative would provide the following number of parking spaces for each use by parking type:

- Commercial Retail: 534 parking spaces (including 14 accessible), 11 motorcycle, 27 bicycle
- Pharmacy: 68 parking spaces (including 3 accessible), 1 motorcycle, 3 bicycle
- Fast-Food Restaurants: 91 parking spaces (including 2 accessible), 2 motorcycle, 5 bicycle
- Gas Station with Convenience Store and Carwash: 18 parking spaces (including 1 accessible), 1 motorcycle, 1 bicycle

Of the 711 parking spaces that would be provided, 57 would consist of electrical vehicle parking spaces. Of these 57 electrical vehicle parking spaces, 29 would be provided with charging equipment installed ready for use (Smith Consulting Architects 2019). The electrical vehicle parking spaces and non-auto parking types (motorcycle and bicycle) are evenly distributed throughout the site to provide access to these non-auto parking types for each building and use. The bicycle parking spaces would be provided in highly visible locations near the front entrances of the various retail commercial buildings. The Retail Alternative would also provide three shower stalls, each of which would include two 2-tiered lockers (Smith Consulting Architects 2019). Two of the shower stalls with two 2-tiered lockers would be located in Building D, and the other shower stall with two 2-tiered lockers would be located in Building E (see Figure 3-Retail Alternative Site Plan).

The Retail Alternative includes development of frontage improvements located on the western, northern, and eastern property boundaries (see Figure 3-Retail Alternative Site Plan). These improvements would include construction of 4-lane private driveway along the eastern boundary of the project site, within the general alignment for Avenida Costa Azul, as proposed in the Otay Mesa Community Plan Update (OMCPU). The proposed 4-lane private driveway along the eastern boundary of the project site would accommodate shared access with the Sunroad Otay 50 project located immediately adjacent to the eastern property line. The adjacent Sunroad Otay 50 project processed a Community Plan Amendment to remove Avenida Costa Azul from the Community Plan Mobility Element. The Community Plan Amendment was approved on May 20, 2019, and the Sunroad Otay 50 project to the east is currently under construction. The Retail Alternative would construct this 4-lane private driveway to its ultimate full width and would install a traffic signal at the intersection of Otay Mesa Road and the 4-lane private driveway.

[Faint Title]

[Faint text]

[Faint text]

[Faint text]

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**Table 2
Minimum Parking Requirements for Retail Alternative**

| Land Use | Amount | Unit | Minimum Parking Ratio (per unit) | Required Auto Parking Spaces | | | Auto Parking Spaces Provided | | | Required Motorcycle Parking Spaces | Motorcycle Parking Spaces Provided | Required Bicycle Parking Spaces | Bicycle Parking Spaces Provided |
|---|--------|------|----------------------------------|------------------------------|------------|------------|------------------------------|------------|------------|------------------------------------|------------------------------------|---------------------------------|---------------------------------|
| | | | | General | Accessible | Total | General | Accessible | Total | | | | |
| Commercial Retail | 106.7 | TSF | 5.0 | 523 | 11 | 534 | 520 | 14 | 534 | 11 | 11 | 27 | 27 |
| Pharmacy with Drive Through (a) | 13.5 | TSF | 5.0 | 67 | 1 | 68 | 65 | 3 | 68 | 1 | 1 | 3 | 3 |
| Fast Food Restaurants with Drive-Throughs (a) | 6 | TSF | 15.0 | 88 | 2 | 90 | 89 | 2 | 91 | 2 | 2 | 5 | 5 |
| Gas Station with Convenience Store (b) | 3.5 | TSF | 5.0 | 18 | 0 | 18 | 17 | 1 | 18 | 1 | 1 | 1 | 1 |
| TOTAL | | | | 696 | 14 | 710 | 691 | 20 | 711 | 15 | 15 | 36 | 36 |

Source: San Diego Municipal Code, Chapter 14: General Regulation, Article 2: General Development Regulation, Division 5: Parking Regulations.

TSF = Thousand Square Feet

(a) Parking for use is shared with the rest of the retail shopping center.

(b) The gas station and convenience store share the same parking area but are separated from the rest of the retail shopping center.

These improvements would also include construction of ultimate half-width improvements for northbound La Media Road on the western property boundary, as well as ultimate half-width improvements for eastbound Otay Mesa Road on the northern property boundary including raised median on La Media Road frontage with an additional lane to allow inbound only access on a 6-lane prime arterial (see Figure 3 Retail Alternative Site Plan). These frontage improvements would also include intersection improvements on the northbound approach of La Media Road/Otay Mesa Road and an eastbound right-turn lane on Otay Mesa Road at the intersection with the proposed 4-lane private driveway.

The proposed commercial buildings would have a maximum height of 45 feet. No maximum height is defined in the base zone, rather it defers to the Community Plan Implementation Overlay Zone (CPIOZ) A and requires consistency with development criteria and standards of the OMCPU. No maximum height is defined in the OMCPU. Per Footnote 11 of Table 131-06B of the OMCPU, the maximum Floor Area Ratio (FAR) within the OMCPU is 0.50 unless a final map has been recorded prior to May 18, 2014. Buildings proposed under the Retail Alternative would not exceed the maximum FAR.

The Retail Alternative would grade the entire 17.6-acre project site and the off-site improvement areas. Implementation of the Retail Alternative would require approximately 10,000 cubic yards (cy) of cut and 185,000 cy of fill, and net import of 175,000 cy of soil. The maximum depth of cut slopes would be zero feet, and the maximum height of fill slopes would be 9 feet.

All landscaping materials and irrigation within the project site would conform to the requirements of the City Land Development Code (LDC) Landscape Standards and the applicable sections of the SDMC Chapter 14, Article 2, Division 4: Landscape Regulations. The landscape plan would provide for a landscaping theme that consists of a natural, drought-tolerant character that compliments the architecture of the Retail Alternative. The plant palette includes, but is not limited to, date palm, fruitless olive, Brisbane box, Chinese pistache, Chilean mesquite, holly oak, London plane tree, Canary Island pine, arbutus standard, and red crape myrtle.

The project site is undeveloped and is not currently serviced by public utilities. However, an existing 21-inch sewer vitrified clay pipe (VCP) traverses Otay Mesa Road, and existing 8-inch and 30-inch VCP sewer pipes traverse La Media Road. The Retail Alternative would construct underground private 6-inch, 8-inch, and 10-inch polyvinyl chloride (PVC) sewer mains and 4-inch and 6-inch private sewer laterals. An existing storm drain is located at the southwest corner of the project site that connects to existing California Department of Transportation (Caltrans) box culverts along the westerly property boundary. The majority of on-site and tributary off-site runoff would continue to enter the Caltrans culverts through the existing storm drain near the southwest corner of the site as well as at two new connection points to be constructed midway along the site. On-site runoff would be collected and conveyed by proposed private drainage facilities (inlets, pipes, curb and gutter, parking lots, etc.) and treated by a series of ten biofiltration basins before entering the Caltrans culverts. The Retail Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain. A small area of runoff along the easterly boundary of the project site would be conveyed to the adjacent Sunroad Otay 50 project property to the east. Once the adjacent property is developed, the Retail Alternative would introduce a permanent best management practice (BMP) to treat this small area of run-on from the easterly boundary of the project site. The Retail Alternative would also install underground connections to existing water

supply lines near the project site. Existing overhead powerlines traverse Otay Mesa Road which proposes to be undergrounded.

Industrial Alternative

As an Industrial Alternative, this project proposes to construct two industrial buildings totaling approximately 256,789 sf, on a 17.6-acre project site. The project site currently consists of one 17.6-acre parcel that would be subdivided into two parcels (Parcel 1: 8.89 acres; Parcel 2: 8.14 acres; Street Dedication: 0.59 acre). Building 1 would total 143,046 sf and would be located on the eastern portion of the project site (Parcel 1). Building 2 would total 113,743 sf and would be located on the western portion of the project site (Parcel 2).

To implement the Industrial Alternative, the following permits and actions are included: a VTM to subdivide the single parcel into two parcels and a SDP to allow large industrial (over 100,000 square feet) and to comply with ESL regulations detailed in SDMC Section 143.0141 due to potential impacts to non-native grassland on the project site.

Figure 5 shows the proposed Industrial Alternative site plan and Figure 6 shows the Industrial Alternative proposed lot layout. Building 1 would total 143,046 sf and would be located on the eastern portion of the project site (Parcel 1). Building 2 would total 113,743 sf and would be located on the western portion of the project site (Parcel 2). As required by the SDMC Chapter 14, Article 2, Division 5: Parking Regulations, the Industrial Alternative would require a total of 258 parking spaces with the proposed development. The Industrial Alternative would meet this requirement by providing 290 paved parking spaces. Of the 290 parking spaces that would be provided, 18 spaces would consist of electrical vehicle parking spaces. Of these 18 electrical vehicle parking spaces, 9 spaces would be provided with charging equipment installed ready for use. The Industrial Alternative would provide 11 accessible parking spaces, 7 motorcycle parking spaces, and 15 long-term bicycle parking spaces. The Industrial Alternative would also provide one shower stall in each building, each of which would include two two-tiered lockers (Atlantis Group 2020).

The Industrial Alternative includes development of frontage improvements located on the western, northern, and eastern property boundaries for frontage and roadway improvements. The acreage and location of these off-site improvements would be the same as for the Retail Alternative, except the Industrial Alternative would not include a project driveway on La Media Road. A signalized intersection is proposed on Otay Mesa Road along the eastern boundary of the project site. This intersection would lead to a shared private driveway with the Sunroad Otay 50 project site to the east. As required for the Retail Alternative, the Industrial Alternative would also construct the ultimate half-width improvements on La Media Road and Otay Mesa Road along the project site frontage, including raised median on La Media Road frontage. These frontage improvements also include intersection improvements on the northbound approach of the La Media Road and Otay Mesa Road intersection, and an eastbound right-turn lane on Otay Mesa Road at the intersection with the proposed 4-lane private driveway (see Figure 5-Industrial Site Plan). Additionally, the Industrial Alternative proposes an uncontrolled emergency access only right-in-only driveway on Otay Mesa Road along the northern boundary of the site.

The proposed industrial buildings would have a maximum height of 40 feet. No maximum height is defined in the base zone, rather it defers to the CPIOZ A and requires consistency with development criteria and standards of the OMCP. No maximum height is defined in the OMCP. Per Footnote 11 of Table 131-06B, the maximum FAR within the OMCPU area is 0.50 unless a final map has been recorded prior to May 18, 2014. Buildings proposed under the Industrial Alternative would not exceed the maximum FAR.

Implementation of the Industrial Alternative would require approximately 900 cy of cut and 184,340 cy of fill, resulting in a net import of 183,440 cy of soil. The maximum depth of cut slopes would be 1.5 feet, and the maximum height of fill slopes would be 9 feet.

All landscaping materials and irrigation within the project site would conform to the requirements of the City's LDC Landscape Standards and the applicable sections of the SDMC Chapter 14, Article 2, Division 4: Landscape Regulations. The landscape plan would provide for a landscaping theme that consists of a natural, drought-tolerant character that compliments the architecture of the Industrial Alternative. The plant palette includes, but is not limited to, Raywood ash, Chinese flame tree, purple tower crape myrtle, Italian stone pine, and Engelmann oak.

The Industrial Alternative would connect to the same existing infrastructure surrounding the project site. Building 1 would be served by a gravity sewer that would connect to the existing sewer VCP that traverses Otay Mesa Road; Building 2 would connect to the proposed private sewer main that would be constructed within the proposed 4-lane private driveway along the eastern boundary (shown as Landmark Road on Figure 5-Industrial Alternative Site Plan) where it would combine flows with the adjacent property to the east. Flows would then travel north and connect into the existing main within Otay Mesa Road. As described for the Retail Alternative above, an existing storm drain is located at the southwest corner of the project site that connects to existing Caltrans box culverts along the westerly property boundary. The majority of on-site and tributary off-site runoff would continue to enter the Caltrans culverts through the existing storm drain near the southwest corner of the site as well as at two new connection points to be constructed midway along the site. The Industrial Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain. On-site runoff would be collected and conveyed to one biofiltration basin along the southern boundary of the project site, a second biofiltration basin in the southeastern corner of the project site, and vegetated swales with trees along the western and northern project site boundaries before entering the Caltrans culverts. The Industrial Alternative would also implement underground connections to existing water supply lines near the project site. Existing overhead powerlines traverse Otay Mesa Road which would be undergrounded.

II. ENVIRONMENTAL SETTING

The undeveloped and vacant 17.6-acre site is located within the IL-3-1 (Light Industrial) Zone of the OMCP. Properties immediately to the west, south and east are also zoned IL-3-1, the property to the north is zoned IH-1-1, and the property immediately to the northeast is zoned IL-2-1. The property to the northwest associated with Brown Field Municipal Airport (BMA) is unzoned. The project site is located south of Otay Mesa Road, east of La Media Road, north of SR-905, and north of Airway Road, in the City of San Diego.

The project site consists of an undeveloped gently sloping ground surface, ranging in elevations from 475 feet to 485 feet above mean sea level (AMSL).

Surrounding uses include commercial/industrial uses to the north, west, and southeast of the project site, and vacant lands to the south and east. BMA is located to the northwest from the project site across the intersection of Otay Mesa Road and La Media Road. Interstate 905 (I-905) westbound off-ramp is located immediately south of the subject site and State Route 125 (SR-125) is located approximately 0.5 mile to the east.

The project site has a land use designation of Heavy Commercial in the OMCPU and Commercial Employment, Retail, and Services in the City of San Diego General Plan. Additionally, the site is within the OMCP, CPIOZ A, Very High Fire Hazard Severity Zone, Airport Land Use Compatibility Overlay Zone (BMA), Airport Influence Area (Review Areas 1 and 2 – BMA), Airport Safety Zones, and the FAA Part 77 Notification Area (BMA).

III. SUMMARY OF ORIGINAL PROJECT

The Program Environmental Impact Report (PEIR) for the OMCPU was certified by the San Diego City Council on March 11, 2014, Resolution No. R-308810 (hereinafter referred to as the OMCPU Final PEIR). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the PEIR examined the environmental impacts of the OMCPU, which is comprised of a series of actions, and the combined actions are characterized as one large project. The PEIR serves to (1) provide decision-makers, public agencies, and the public with detailed information about the potential significant adverse environmental impacts associated with implementation of the OMCPU; and (2) identify a mitigation framework (in the Mitigation Monitoring and Reporting Program [MMRP]) which provides ways to substantially lessen or avoid significant effects, whenever feasible. The approval of the OMCPU entailed an update to the 1981 Otay Mesa Community Plan, a General Plan Amendment, Rescission of the Otay Mesa Development District (OMDD), adoption of a Rezone Ordinance to replace the OMDD with citywide zoning and creation of two new CPIOZs, amendments to the City's LDC, and an update of the Otay Mesa Community Plan Public Facilities Financing Plan (PFFP).

Implementation of the OMCPU 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 OMCPU. In accordance with CEQA Guidelines Section 15168(c), when subsequent activities are proposed, the City will examine those activities to determine whether the effects have been adequately addressed in the PEIR. If, in examining these future actions, the City finds no new effects could occur, or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, the City can approve the activity as being within the scope covered by the PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from the PEIR, pursuant to CEQA Guidelines Sections 15152, 15153, and 15168 through preparation of a Mitigated Negative Declaration, Addendum, or Focused EIR.

Both Alternatives are considered a future development proposal that would implement the OMCPU that was programmatically evaluated in the Final PEIR. As such, the City examined the project in light of OMCPU and associated Final PEIR, and determined that additional refined analysis for the project-specific action that implements the OMCPU should be conducted to (1) demonstrate that potential impacts resulting from the proposed project were previously identified in the Final PEIR,

(2) project impacts would not be substantially more severe than identified in the Final PEIR, and (3) the proposed project and project-specific mitigation would implement and be consistent with the mitigation framework identified in the Final PEIR and MMRP. This Addendum to the Final PEIR for the OMCPU serves as the subsequent CEQA documentation for the proposed project.

The project site is identified in the OMCPU as undeveloped land within the Airport District and is designated Heavy Commercial. Lands with the Heavy Commercial Designation allow for a variety of commercial and industrial uses, but it is intended for heavier commercial uses such as distribution, storage, and large retail establishments.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Final PEIR (Project No. 30330/304032/SCH No. 2004651076) for the OMCPU. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, 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 CEQA Guidelines apply. No changes in circumstances have occurred,

and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

This document serves as an Addendum to the previously certified OMCPU Final PEIR, as referenced above. This addendum to the PEIR provides the required project-specific environmental review pursuant to CEQA and the City's implementing procedures. The analysis in this document evaluates the adequacy of the OMCPU Final PEIR, relative to the approval of the project. The OMCPU Final PEIR defines mitigation measures for all projects within the OMCPU area, including the project site.

The OMCPU Final PEIR indicates that direct significant impacts to the following would be substantially lessened or avoided if all the mitigation measures included in the Final PEIR are implemented: land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources. The OMCPU Final PEIR concluded that significant impacts related to noise, traffic/circulation, air quality, greenhouse gas (GHG) emissions, and utilities (solid waste) would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the OMCPU Final PEIR would result in significant traffic/circulation, air quality, noise, utilities (solid waste), and GHG emissions, which would remain significant and unmitigable.

The following environmental issues were considered during review of the project relative to the OMCPU Final PEIR and determined to be potentially significant and required subsequent analysis and or discussion as part of this Addendum: land use, visual effects/neighborhood character/aesthetics, air quality/odor, biological resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, energy conservation, noise, paleontological conditions, traffic/circulation, public services, utilities, water supply, population and housing, agricultural and mineral resources, and GHGs.

The following provides an analysis of the potential impacts of the project compared with the impacts analyzed in the OMCPU Final PEIR. This comparative analysis has been undertaken (pursuant to the provisions of CEQA) to provide City decision makers with the factual basis for determining whether any changes in the project, any changes in circumstances, or any new information since the OMCPU Final PEIR was certified require additional environmental review or preparation of a subsequent or supplemental EIR. The basis for each of the findings is explained in the analysis that follows.

Impact Analysis Summary

The analysis provided in this Addendum indicates that there are no new significant impacts that would result from the project and that all project-level impacts can be fully mitigated. A comparison of the project's impacts related to those of the adopted OMCPU Final PEIR is provided below in Table 3.

| Table 3 Impact Assessment Summary | | | | | |
|--|-----------------------------------|------------------|----------------|-------------------------------|---------------------------|
| Environmental Issues | OMCPU Final PEIR Finding Analysis | OMCPU 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 | Significant but Mitigated |
| Historical Resources | Significant but Mitigated | Yes | No new impacts | Yes | Significant but Mitigated |
| Human Health/Public Safety/Hazardous Materials | Significant but Mitigated | Yes | No new impacts | No | Less than Significant |
| Hydrology/Water Quality | Significant but Mitigated | Yes | No new impacts | No | Less than Significant |
| Geology/Soils | Significant but Mitigated | Yes | No new impacts | No | Less than Significant |
| Energy Conservation | Less than Significant | No | No new impacts | No | Less than Significant |
| Noise | Significant, Unmitigated | Yes | No new impacts | No | Less than Significant |
| Paleontological Resources | Significant but Mitigated | Yes | No new impacts | No | Less than Significant |
| Traffic/Circulation | Significant, Unmitigated | Yes | No new impacts | Yes | Significant but Mitigated |
| 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 Program EIR

Land Use is discussed in Section 5.1 of the OMCPU Final PEIR that concluded that implementation of the Otay Mesa CPU 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 OMCPU to reduce or avoid potential land use incompatibility impacts. The OMCPU Final PEIR determined that compliance with the OMCPU 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 OMCPU 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 measures identified in the OMCPU Final PEIR Section 5.6, the potential environmental impacts resulting from change in land use designations in accordance with the OMCPU were determined to be less than significant.

The OMCPU Final PEIR identified that the development footprint of the OMCPU would encroach into sensitive ESL areas. Additionally, implementation of the project would have the potential to result in significant impacts to historical resources given the presence of historical resources throughout the OMCPU area. However, future projects would require subsequent environmental review and compliance with OMCPU policies, development standards, as well as adherence to the ESL Regulations, Historical Resources Regulations, and site-specific mitigation, as applicable, in accordance with the mitigation framework. Therefore, program-level impacts were concluded to be mitigated to below a level of significance.

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

Retail Alternative

The project site has a land use designation of Heavy Commercial in the OMCPU and is zoned IL-3-1. The purpose of the IL-3-1 zone is to provide for a wide range of manufacturing and distribution activities by providing an environment free from adverse impacts associated with some heavy industrial uses. The IL-3-1 allows a mix of light industrial, office, and commercial uses. Allowed uses in Zone IL-3-1 are defined in Table 131-06B and include, but are not limited to, commercial services, mobile food trucks, urgent care facilities, offices, vehicle and vehicular sales and service, distribution and storage, light manufacturing, marine industry, research and development, and trucking and transportation terminals. Other uses are conditionally permitted or permitted with a neighborhood use or conditional use permit. A number of limitations are specified in the SDMC that affect the allowable gross floor area of the premises for certain uses. Per Footnote 11 of Table 131-06B, the maximum FAR within the OMCPU area is 0.50 unless a final map has been recorded prior to May 18, 2014. Development of the commercial uses proposed under the Retail Alternative would be consistent with the existing land use and zoning designations. The proposed commercial uses would be consistent with the surrounding commercial and industrial land uses that occur to the north, west, and southeast of the project site. Improvements would consist of frontage and roadway improvements that would be consistent with the planned land use and transportation network. Therefore, the Retail Alternative would not divide an established community, and impacts would be less than significant.

The purpose of the Environmentally Sensitive Lands (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 contains ESL due to the presence of sensitive biological resources. A site-specific Biological Resource Report was completed consistent with OMCPU Final PEIR mitigation framework measure BIO-1 (RECON Environmental, Inc. [RECON] 2019a). As described in the discussion of potential impact to biological resources below, the Retail Alternative would implement mitigation measures MM-BIO-1 through MM-BIO-3 to reduce impacts to a level less than significant. These mitigation measures are consistent with OMCPU Final PEIR mitigation framework measure BIO-1. Therefore, the Retail Alternative 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. A site-specific Historical Resources Survey was prepared consistent with OMCPU Final PEIR mitigation framework measure HIST-1 (RECON 2017a). As described in the discussion of potential impact to historical resources below, a testing program for the portion of CA-SDI-12337 on the project site is not recommended due to the small number of artifacts observed, the lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant. However, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Therefore, monitoring during ground-disturbing activities would be required, consistent with OMCPU Final PEIR mitigation framework measure HIST-1. As documented in the Historical Resources Survey, the Native American community has recommended that a Native American monitor be present during ground-disturbing activities (RECON 2017a). Additionally, there are no historic buildings, structures, and objects on the project site. The Retail Alternative would implement monitoring during ground-disturbing activities consistent with the OMCPU Final PEIR mitigation framework measure HIST-1. Implementation of mitigation measures MM-HIST-1 as stated in Section VI, MMRP would reduce impacts related to archaeological resources and cultural resources to a level less than significant. Therefore, the Retail Alternative would be consistent with the City's Historical Resources Regulations.

In Table NE-3 of the General Plan, retail sales are "compatible" with exterior noise levels up to 65 A-weighted decibels [dB(A)] Community Noise Equivalent Level (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 an indoor noise level of 50 CNEL. Additionally, based on the City's CEQA Significance Thresholds, the traffic noise significance threshold at exterior useable space is 75 CNEL for retail uses. Based on the vehicle traffic noise contours calculated in the OMCPU Final PEIR, all proposed buildings and exterior use spaces would be located outside the 75 CNEL contours for vehicle traffic on SR-905, Otay Mesa Road, and La Media Road. These noise contours completed for the OMCPU Final PEIR did not account for shielding that would be provided by the proposed buildings that would be located along the southern perimeter of the project site. These buildings would shield receivers from vehicle traffic on SR-905, further reducing exterior noise levels. Furthermore, there would not be any exterior uses associated with the proposed retail uses. Exterior noise levels would not exceed the City's significance threshold of 75 CNEL (City of San Diego 2016), and exterior noise impacts associated with the Retail Alternative

would be less than significant. The interior noise level standard for retail uses is 50 CNEL. No building design is available for the proposed commercial uses at this time. However, assuming light-frame construction, interior noise levels would be reduced by 25 dB(A) from exterior noise levels. All proposed buildings would be located outside the 75 CNEL noise contour, therefore, a 25 dB(A) reduction would result in interior noise levels that are less than 50 CNEL. Thus, interior noise levels in the commercial buildings would be compatible with City's interior noise standard of 50 CNEL. Interior noise impacts would be less than significant.

The project site is located outside the 60 CNEL contours for BMA and the General Abelardo L. Rodriguez International Airport, as depicted in Figure 5.1-4 of the OMCPU Final PEIR. No impact related to aircraft noise would occur.

Exhibit III-1 of the Airport Land Use Compatibility Plan (ALUCP) for the Brown Field Municipal Airport, shows that the project site is located outside of the 60 dB(A) CNEL noise contour, and therefore would be exposed to aircraft noise levels less than 60 dB(A) CNEL. Review of the BMA ALUCP Exhibit III-2 Safety determined that the project site is located within Zone 6 Traffic Pattern Zone. Commercial and retail uses are considered compatible within Zone 6. The project site is located within the Airport Influence Area - Review Areas 1 and 2 for BMA, and within the Federal Aviation Administration (FAA) Part 77 Notification Area for BMA. The FAA reviewed the Retail Alternative and determined that the proposed maximum height of 45 feet for the commercial buildings would not be a hazard to air navigation (FAA 2020). Therefore, the commercial retail land uses would be compatible with the ALUCP. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final PEIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. Industrial development is a permitted use under the Heavy Commercial land use designation and IL-3-1 (Industrial-Light) zone. Therefore, the Industrial Alternative would be consistent with the existing land use designation and zoning for the site. The proposed industrial uses would be consistent with the surrounding commercial and industrial land uses that occur to the north, west, and southeast of the project site. Improvements would consist of frontage and roadway improvements that would be consistent with the planned land use and transportation network. Per Table NE-3 of the General Plan, industrial uses are "compatible" with exterior noise levels up to 75 CNEL. Additionally, based on the City's CEQA Significance Thresholds, the traffic noise significance threshold at exterior useable space is 75 CNEL for industrial uses. Based on the vehicle traffic noise contours calculated in the OMCPU Final PEIR, noise levels would not exceed 75 CNEL. The proposed industrial buildings would have a maximum height of 40 feet. No maximum height is defined in the base zone, rather it defers to the CPIOZ A and requires consistency with development criteria and standards of the OMCP. No maximum height is defined in the OMCP. FAA reviewed the Industrial Alternative and determined that the proposed maximum height of 40 feet would not be a hazard to air navigation (FAA 2020).

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result

in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Visual Effects and Neighborhood Character

OMCPU Program EIR

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 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 OMCPU 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 OMCPU and to prevent impacts to views of public resources, the OMCPU included designating view corridors and gateways through plan policies and project design features. With compliance with the OMCPU 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 OMCPU area would become more urbanized. The land use and development design guidelines and policies of the OMCPU are intended to ensure that future development within the OMCPU 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.

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.

The OMCPU Final PEIR identified that the OMCPU 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 OMCPU policies would ensure that potential impacts would be to below a level of significance.

Retail Alternative

The project site is relatively flat and is surrounded by commercial and industrial land uses to the north, west, and southeast, and BMA to the northwest. Additionally, there are no scenic amenities, such as public views of canyons and mesas, that are visible from the project site. Review of Figure 5.2-8 of the OMCPU Final PEIR determined that a "View Corridor through Industrial/Commercial" is located at the intersection of La Media Road and Otay Mesa Road, immediately northwest of the project site. However, the OMCPU Final PEIR stated that projects near a "View Corridor through Industrial/Commercial" would primarily include developed industrial land and undeveloped parcels with non-native grasslands. As described in greater detail in the biological resources section below, vegetation on the project site and off-site improvement area consists entirely of Non-Native Grassland (20.5 acres), Disturbed Non-native Grassland (4.7 acres), Disturbed Land (0.9 acre), and Urban/Developed Land (1.4 acres). Additionally, the Retail Alternative has been designed with appropriate setbacks that would avoid blocking views through this view corridor and would introduce landscaping along the boundaries adjacent to Otay Mesa Road and La Media Road that would improve the visual quality through this view corridor. Furthermore, this view corridor already includes existing industrial development along Otay Mesa Road and La Media Road. Therefore, the Retail Alternative would not change the existing character of the view corridor, would not block views through the corridor, would improve the aesthetic quality of view corridor through landscaping. The Retail Alternative would comply with applicable land use and development design guidelines and policies of the OMCPU which are intended to ensure that future development within the OMCPU 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. Therefore, the Retail Alternative would be compatible with the scale and design of surrounding development, and impacts would be less than significant.

The project site is located within the "Airport District" of the Otay Mesa community, as shown in Figure 2-2 of the OMCPU. BMA is the main visual features within the Airport District, and the project site is surrounded by commercial and industrial land uses to the north, west, and southeast. Development of the Retail Alternative would be consistent with the character of the surrounding development and larger Airport District, as it would introduce commercial land uses similar to what is present in the surrounding area. Additionally, the OMCPU Final PEIR determined that the OMCPU would continue industrial and commercial uses for the areas directly surrounding BMA within the Airport District within the airport flight activity zone and that the future visual quality of these areas would likely transition to a more organized and aesthetically visual appearance than currently exists. The Retail Alternative would support the continuation of commercial uses within the Airport District. Review by the City staff determined that design of the Retail Alternative would be consistent with all relevant land use and development design guidelines and policies of the General Plan and CPU, which would assist with this transition to a more organized and aesthetically visual appearance. Therefore, development of the site would be consistent with the existing surrounding development in terms of bulk and scale, 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 Retail Alternative would alter more than 2,000 cy of earth per graded acre, the Retail Alternative would not meet any of the conditions that would result in a significant

impact related to landform alteration per the City's 2016 CEQA Significance Determination Thresholds. There are no steep hillsides on the project site due to the relatively flat elevations ranging from 475 to 485 feet above mean sea level. Similarly, the Retail Alternative would not require mass terracing of natural slopes due to the relatively flat nature of the site. Furthermore, the Retail Alternative would not create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Therefore, the Retail Alternative would not result in a substantial change in the existing 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 Retail Alternative would require a major change to the OMCPU Final PEIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. The Industrial Alternative would utilize the same development footprint and has been designed with appropriate setbacks that would avoid blocking views through the "View Corridor through Industrial/Commercial" and would introduce landscaping along the boundaries adjacent to Otay Mesa Road and La Media Road that would improve the visual quality through this view corridor. The Industrial Alternative would support the continuation of industrial uses within the Airport District. Review by the City staff determined that design of the Industrial Alternative would be consistent with all relevant land use and development design guidelines and policies of the General Plan and OMCPU, would assist with this transition to a more organized and aesthetically visual appearance. Therefore, development of the site would be consistent with the existing surrounding development in terms of bulk and scale, and impacts would be less than significant. Furthermore, although the Industrial Alternative would alter more than 2,000 cubic yards of earth per graded acre, it would not meet any of the conditions that would result in a significant impact related to landform alteration per the City's 2016 CEQA Significance Determination Thresholds for the same reasons described above for the Retail Alternative.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Air Quality

OMCPU Final Program EIR

Section 5.3 of the OMCPU Final PEIR provides an analysis of air quality impacts associated with the OMCPU. The OMCPU Final PEIR determined that development occurring as a result of implementing the OMCPU 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 OMCPU and the traffic generated under the OMCPU 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 OMCPU could result in air quality impacts related to criteria pollutant emissions from construction and operation of a project within the OMCPU area. The OMCPU Final PEIR included mitigation framework 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 (CO) hotspots and diesel particulate matter would be less than significant, as there would be no harmful concentrations of CO and localized air quality emissions would not exceed applicable standards, and the chronic risks resulting from diesel exhaust emissions associated with the vehicles operating within and adjacent to the OMCPU 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 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 OMCPU 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 communities), impacts associated with odors would be less than significant.

Retail Alternative

Project-specific construction and operational air emissions were calculated using California Emissions Estimator Model (CalEEMod) (RECON 2019b) to assess impacts associated with air quality emissions associated with the project 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 (O₃). 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 as Heavy Commercial in the OMCPU and is zoned IL-3-1. The Retail Alternative would be consistent with the existing land use and zoning designations.

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related emissions include fugitive dust from grading activities, equipment exhaust,

vehicle trips, and power consumption. Construction emissions for the Retail Alternative were modeled assuming that construction would begin in 2020 and last for approximately 16 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 4 shows the total projected construction maximum daily emission levels for each criteria pollutant (RECON 2019b).

| Construction | Pollutant | | | | | |
|--------------------------------|------------|-----------------|------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Site Preparation | 4 | 42 | 22 | <1 | 20 | 12 |
| Grading | 5 | 50 | 32 | <1 | 11 | 6 |
| Building Construction | 4 | 34 | 29 | <1 | 5 | 2 |
| Paving | 3 | 13 | 15 | <1 | 1 | 1 |
| Architectural Coatings | 11 | 2 | 3 | <1 | 1 | <1 |
| Maximum Daily Emissions | 11 | 50 | 32 | <1 | 20 | 12 |
| <i>Significance Threshold</i> | <i>137</i> | <i>250</i> | <i>550</i> | <i>250</i> | <i>100</i> | <i>67</i> |

ROG = reactive organic gases; NO_x = oxides of nitrogen; CO = carbon monoxide;
 SO_x = oxides of sulfur; PM₁₀ = 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
 Source: RECON 2019b

Standard dust control measures would be implemented as a part of construction of the Retail Alternative in accordance with SDAPCD rules and regulations. Fugitive dust emissions were calculated using CalEEMod default values and did not take into account the required dust control measures. Thus, the emissions shown in Table 4 are conservative. For assessing the significance of the air quality emissions resulting during construction of the Retail Alternative, the construction emissions were compared to the City significance thresholds shown in Table 4. As shown in Table 4, maximum daily construction emissions associated with the Retail Alternative are projected to be less than the applicable thresholds for all criteria pollutants (RECON 2019b). Construction related air quality impacts would be less than significant, and construction of the Retail Alternative 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 Retail Alternative 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 construction of the Retail Alternative. Therefore, impacts would be less than significant.

Operations emissions generated by the Retail Alternative would come from area and energy sources (consumer products, landscape maintenance, architectural coatings, natural gas use, etc.), as well as a mobile source (vehicle traffic). The Retail Alternative would generate a total of 14,744 driveway trips and 8,660 cumulative trips (which do not include pass-by trips) (RICK Engineering 2021). Based on regional data compiled by California Air Resources Board (CARB) as part of the emission factor

model, the average regional trip length for all trips in San Diego County in 2020 is 5.62 miles (CARB 2014). Table 5 provides a summary of the operational emissions generated by the Retail Alternative (RECON 2019b). As shown, Retail Alternative-generated emissions are projected to be less than the City's significance thresholds (City of San Diego 2016) for all criteria pollutants. Therefore, Retail Alternative 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.

| Source | Pollutant | | | | | |
|-------------------------------|------------|-----------------|------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Area Sources | 3 | <1 | <1 | <1 | <1 | <1 |
| Energy Sources | <1 | <1 | <1 | <1 | <1 | <1 |
| Mobile Sources | 19 | 66 | 144 | <1 | 31 | 9 |
| Total | 22 | 66 | 145 | <1 | 31 | 9 |
| <i>Significance Threshold</i> | <i>137</i> | <i>250</i> | <i>550</i> | <i>250</i> | <i>100</i> | <i>67</i> |

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; PM₁₀ = 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
 Source: RECON 2019b

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. Although the project site is located adjacent to SR-905, the Retail Alternative would not include any residential receptors or any other sensitive receptors. Additionally, no existing sensitive receptors are located within the vicinity of the project site. The nearest residential uses are located more than two miles west of the project site. Therefore, the Retail Alternative is not anticipated to result in the exposure of sensitive receptors to substantial levels of pollution, and impacts would be less than significant.

The Retail Alternative does not include heavy industrial or agricultural uses that are typically associated with objectionable odors. The Retail Alternative would involve the use of diesel-powered construction equipment. Although diesel exhaust odors may be noticeable temporarily at adjacent properties, construction activities would be temporary. Therefore, odor impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to or less than those identified for the Retail Alternative. Industrial development is a permitted use under the Heavy Commercial land use designation and IL-3-1 zoning designation. Additionally, traffic modeling for the Industrial Alternative determined that it would generate 2,054 Average Daily Traffic (ADT), which would be 6,606 ADT less than the cumulative ADT of 8,660 projected for the Retail Alternative (RICK Engineering 2021). Thus, the Industrial Alternative would be consistent with the growth projections

used to develop the RAQS and would not obstruct or conflict with the implementation of the RAQS. Further, because the Industrial Alternative would generate less traffic, operational emissions would be less than those generated for the Retail Alternative summarized in Table 5 above (RECON 2019b). Table 6 provides a summary of the operational emissions generated by the Industrial Alternative (RECON 2019b). These operational emission calculations take into account the increased amount of truck traffic associated with industrial land uses.

| Source | Pollutant | | | | | |
|-------------------------------|------------|-----------------|------------|-----------------|------------------|-------------------|
| | 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 | 3 | 15 | 40 | <1 | 12 | 3 |
| Total | 10 | 16 | 41 | <1 | 12 | 3 |
| <i>Significance Threshold</i> | <i>137</i> | <i>250</i> | <i>550</i> | <i>250</i> | <i>100</i> | <i>67</i> |

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; PM₁₀ = 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
 Source: RECON 2021a

The proposed industrial uses would be consistent with the surrounding commercial/industrial land uses to the north, west, and southeast of the project site, and would not include a heavy industrial use that would generate significant odors during operation. Air quality impacts associated with construction activities would be similar to those associated with the Retail Alternative.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Biological Resources

OMCPU Final Program EIR

Section 5.4 of the OMCPU Final PEIR provides an analysis of biological resource impacts associated with the OMCPU. The OMCPU Final PEIR stated that implementation of the OMCPU 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 a mitigation framework including 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 habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation

measures shall be developed. Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan, which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts. Implementation of the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

The OMCPU Final PEIR concluded that future development, including construction or extension of OMCPU 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. However, because the Retail Alternative is not located adjacent to the MHPA, mitigation framework measure LU-2 does not apply to the Retail Alternative.

The OMCPU Final PEIR determined that future projects within the OMCPU 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. OMCPU Final PEIR mitigation framework measure BIO-1 would reduce impacts to sensitive habitat to a less than significant level. In addition, compliance with OMCPU polices, and established development standards and regulations would reduce impacts to sensitive habitats to a less than significant level.

The OMCPU Final PEIR identified potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because any adjustments would be required to meet the equivalency criteria for approval. The OMCPU Final PEIR determined that MHPA adjacency impacts would be addressed at the project-level, and projects adjacent to MHPA areas would be required to comply with the MHPA Land Use Adjacency Guidelines and implement mitigation framework measure LU-2, which would reduce MHPA adjacency impacts to a less than significant level. The OMCPU Final PEIR also determined that the OMCPU would be consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact and the OMCPU incorporates policies for adhering to the Management Directives, and no significant impacts relating to MSCP consistency would occur. However, because the Retail Alternative is not located adjacent to the MHPA, mitigation framework measure LU-2 does not apply to the Retail Alternative.

Regarding 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 would be mitigated through implementation of the mitigation framework measure LU-2, reducing impacts to a less than significant level. However, because the project is not located adjacent to the MHPA, mitigation framework measure LU-2 does not apply to the Retail Alternative.

The OMCPU Final PEIR concluded that future projects implemented in accordance with the OMCPU 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 OMCPU which cannot demonstrate compliance with CPIOZ A because impacts to wetlands/jurisdictional resources cannot be avoided would be required to implement mitigation measure BIO-4, which would reduce impacts to wetlands to a less than significant level.

The 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 OMCPU would be mitigated to a less than significant level with implementation of mitigation measures BIO-1 through BIO-4 and LU-2.

Retail Alternative

Consistent with OMCPU Final PEIR mitigation framework measure BIO-1, a site-specific Biological Resources Report was prepared by RECON (RECON 2019a). Four Western Burrowing Focused Protocol Surveys were completed for the Retail Alternative by RECON completed in 2017 on April 4, May 17, June 15, and July 7. In order to determine the presence or absence of the species within the Retail Alternative boundaries, the results of these surveys are included as an attachment to the Biological Resources Report completed for the Retail Alternative (RECON 2019a, Table 1).

MHPA lands are those that have been included within the City's MSCP Subarea Plan for habitat conservation. The Retail Alternative is not within or immediately adjacent to the MHPA. The nearest MHPA lands are located approximately 0.4 mile south of the project site. As a result, the OMCPU Final PEIR Mitigation Framework regarding direct and indirect impacts to the MHPA as covered under Mitigation Measure LU-2 and for noise generation impacts within the MHPA covered as part of Mitigation Measure LU-2 are not applicable to the Retail Alternative. Additionally, the Retail Alternative is subject to CEQA review and has been designed consistent with the requirements of the City's Biology Guidelines, MSCP Subarea Plan, and the Landscape Standards in the Land Development Manual in order to prevent the introduction of invasive species consistent with Section 5.4.8.1 of the OMCPU Final PEIR.

No sensitive plant species were observed or are expected to occur in the survey area. No wetlands are located on the project site. Although it is reasonable to assume that wildlife may move locally through the project site, the Retail Alternative parcel and off-site development area are isolated by barriers (e.g., commercial development, roads, SR-905) that prevent the site from being part of a larger wildlife movement corridor. While there may be some wildlife movement within the property, the site, as a whole, does not provide a major movement corridor for wildlife species.

Three vegetation communities and one land cover type occur within the on-site and off-site survey area: non-native grassland, disturbed non-native grassland, disturbed land, and urban/developed. The acreages of vegetation communities on the project site identified in the Biological Resources Report are listed in Table 7 (RECON 2019a).

| Table 7 Existing Vegetation Communities within the Retail Alternative Survey Area | | | | |
|--|---|------------------------------|----------------------|--------------------------------------|
| Vegetation Communities (Oberbauer 2008) | Habitat Types (City of San Diego 2018) | City of San Diego Tier | Acreage (On-site) | Acreage (Off-site Survey Area) |
| Uplands | | | | |
| Non-Native Grassland | Non-Native Grasslands | III-B | 12.9 | 7.6 |
| Disturbed Non-native Grassland | Non-Native Grasslands | III-B | 4.70 | 0 |
| Disturbed Land | Disturbed Land | IV | 0 | 0.9 |
| Urban/Developed Land | Disturbed Land | IV | 0 | 1.4 |
| TOTAL | | | 17.6 | 9.9 |
| Source: RECON 2019b | | | | |

Direct impacts would occur to the entire 17.6-acre on-site Retail Alternative parcel and to 6.3 acres of the off-site survey area for a total of 23.9 acres. Impact acreages for the vegetation communities are provided in Table 8. Impacts to sensitive vegetation communities (i.e., non-native grassland) are considered significant and require mitigation.

| Table 8 Impacts to Existing Vegetation Communities within the Retail Alternative Survey Area | | | |
|---|---------------------------|-----------------------------|---|
| Vegetation Communities (Oberbauer 2008) | City of San Diego Tier | Impact Acreage (On-site) | Impact Acreage (Off-site Survey Area)* |
| Uplands | | | |
| Non-Native Grassland | III-B | 12.9 | 4.0 |
| Disturbed Non-native Grassland | III-B | 4.7 | 0 |
| Disturbed Land | IV | 0 | 0.9 |
| Urban/Developed Land | IV | 0 | 1.4 |
| TOTAL | | 17.6 | 6.3 |
| * Approximately 3.6 acres of the 9.9-acre off-site survey area would not be affected by the Retail Alternative. | | | |
| Source: RECON 2019a. | | | |

Western burrowing owl is the only sensitive wildlife species that was detected during the survey. The results of 2017 survey found a family of four burrowing owls, two adults and two young, on the site in the exact same location as the burrowing owl observed in 2014. The burrowing owls were observed using a burrow on a berm just east of La Media Road within the non-native grassland area. Other suitable burrows were noted nearby this main burrow. The proposed development would impact the entire site, and impacts to non-native grassland habitat, including disturbed non-native grassland, would result in the loss of habitat for the western burrowing owl present on-site. Based on the 2017 survey information, the Retail Alternative would permanently impact one active burrow and potential satellite burrows along within 12.9 acres of non-native grassland habitat and 4.7 acres of disturbed non-native grassland habitat used by burrowing owls on the Retail Alternative parcel. It should be noted that off-site impacts to 4.0 acres of suitable burrowing owl habitat to the east have already occurred as construction activities associated with the Sunroad Otay 50 Project have removed the vegetation. The mitigation for impacts to these 4.0 acres were satisfied under conditions of approval for the adjacent Sunroad Otay 50 Project, which included implementation of a successful eviction plan, and burrowing owls currently do not exist on the Sunroad Otay 50 Project site. Therefore, the impact/mitigation analysis associated with the off-site the Sunroad Otay 50 Project is no longer included for the Retail Alternative.

The Retail Alternative would result in potential edge effects on the adjacent grassland habitat along the eastern boundary of the proposed development. The proposed development would impact the entire site, and the loss of non-native grassland habitat would negatively affect the home range size of the burrowing owls on-site and reduce the potential for future use of the site by burrowing owls. The Retail Alternative would eliminate potential nesting sites and burrowing mammal presence and abundance on the project parcel. Consequently, preconstruction burrowing owl surveys presented as MM-BIO-3 in Section VI, MMRP would be required to determine absence or presence. This measure would be consistent with the OMCPU Final PEIR Mitigation Framework BIO-1. The project would implement mitigation measures MM-BIO-1 Biological Resource Protection During Construction and MM-BIO-2 Sensitive Upland Vegetation Communities to reduce impacts related to biological resources to a level less than significant.

Section 3503 of the California Fish and Game Code states, "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, including raptors, except as otherwise provided by this code or any regulation made pursuant thereto." Direct impacts to nesting birds using the site could occur if construction activities disrupt breeding activities or inadvertently kill birds and destroy nests. The Migratory Bird Treaty Act provides more protection, on a federal level, against unlawful destruction of bird nests and from take and harassment of, specifically, migratory birds and their breeding activities. Additionally, there is the potential for the Retail Alternative to have indirect impacts on listed and sensitive bird species within the survey area and adjacent off-site habitats due to noise levels generated during construction. Indirect impacts may also result from excess lighting. Indirect impacts to sensitive wildlife may be significant without mitigation measures. Implementation of MM-BIO-1 and MM-BIO-3 presented in Section VI, MMRP would reduce impacts on nesting birds and indirect species to a level less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

An Addendum to the Biological Resources Report for the La Media Retail Project was prepared by RECON (RECON 2021b). The development footprint of the Industrial Alternative would be entirely developed and is located entirely within the same footprint of the Retail Alternative evaluated within the Biological Resources Survey (RECON 2019a). The addendum determined that on-site impacts associated with the Industrial Alternative would be identical to those identified for the Retail Alternative. The Industrial Alternative would utilize the same development footprint as the Retail Alternative and would have the same level of impact related to biological resources that was evaluated within the Biological Resources Survey (RECON 2019a). Off-site impacts to 4.0 acres of suitable burrowing owl habitat to the east have already occurred as construction activities associated with the Sunroad Otay 50 Project have removed the vegetation. The mitigation for impacts to these 4.0 acres was satisfied under conditions of approval for the adjacent Sunroad Otay 50 Project, which included implementation of a successful eviction plan, and burrowing owls currently do not exist on the Sunroad Otay 50 Project site. Therefore, the impact and mitigation analysis associated with the off-site the Sunroad Otay 50 Project is no longer included for the Industrial Alternative.

Impacts to sensitive vegetation communities associated with the Industrial Alternative would be the same as what would occur under the Retail Alternative. Both project designs would impact 17.6 acres of non-native grassland. Off-site impacts from frontage and road improvements to the north and west of the project site would also be the same as what would occur under the Retail Alternative. Both project designs would impact 0.9 acre of disturbed land and 1.4 acres of developed land. Impacts to non-native grassland are considered significant.

Impacts to general wildlife and nesting birds associated with the industrial alternative would be the same as what would occur under the Retail Alternative. Development of the Industrial Alternative would impact 12.9 acres of non-native grassland habitat and 4.7 acres of disturbed non-native grassland habitat used by western burrowing owl, the same acreage as would occur under the Retail Alternative. Impacts to nesting birds and western burrowing owl would be considered significant and require mitigation similar to the Retail Alternative as described Section VI, MMRP below. The City and Wildlife Agencies (U.S. Fish and Wildlife Service and CDFW) have concurred with the mitigation options documented in MM-BIO-3 Burrowing Owl pursuant to the Addendum to the Biological Resources Report for the La Media Retail Project was prepared by RECON (RECON 2021b). Under Mitigation Option-1: Conservation of Land Option and Mitigation Bank Credit Allocation, the applicant would establish an escrow account with \$1,350,000 (equivalent to 18 acres at \$75,000 per acre for Ramona Grassland Conservation Bank credits or towards the acquisition of land in Otay Mesa); however, should the City be unsuccessful in acquiring sufficient land to include the project, on or before June 30, 2021, the City shall direct the applicant to withdraw the funds for the purchase of land identified by the City or purchase of Grassland Credits at the Ramona Grassland Conservation Bank or Lonestar Mitigation Bank. Under Mitigation Option 2 – Mitigation Bank Credits –Western Burrowing Owl Mitigation, the applicant shall provide documentation that mitigation for burrowing owl, that mitigates for the loss of 17.6 acres of on-site suitable occupied burrowing owl habitat, will be achieved through the purchase of a minimum 17.6 acres of credits of suitable occupied burrowing owl habitat from an approved mitigation bank. The mitigation bank must be located within the City of San Diego limits and either within or adjacent to the MHPA (e.g., Lonestar Mitigation Bank). If mitigation bank lands occur outside of the MHPA, then mitigation required would a total a minimum of 17.6 acres. Both mitigation options would implement the MSCP Area Specific Management Directives/Conditions of Coverage for the burrowing owl.

Potential indirect impacts on listed and sensitive bird species within the survey area and adjacent off-site habitats associated with construction noise and excessive lighting under the Industrial Alternative would be the same as what would occur under the Retail Alternative. Indirect impacts to sensitive wildlife would be significant without mitigation measures. Implementation of MM-BIO-1 and MM-BIO-3 presented in Section VI, MMRP would reduce indirect impacts on listed and sensitive species to a level less than significant.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Historical Resources

OMCPU Final Program EIR

Section 5.5 of the OMCPU Final PEIR provides an analysis of historical resource impacts associated with the OMCPU. 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 OMCPU area. The OMCPU Final PEIR stated that future discretionary development projects could result in a potentially significant impact to archaeological resources, as well as religious or sacred sites, and would be required to apply the Mitigation Framework measure HIST-1 to address impacts associated with archaeological resources.

The OMCPU Final PEIR determined that there are no known human remains in the OMCPU area, but that 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 would be required to implement the Mitigation Framework for Historical Resources, including measure HIST-1.

Retail Alternative

Archaeological Resources

A site-specific Historical Resources Survey was prepared by RECON (RECON 2017a). The 17.6-acre project parcel was surveyed on July 10, 2014 by RECON archaeologists Carmen Zepeda-Herman and Harry Price. The RECON archaeologists were accompanied by Native American monitor Gabe Kitchen of Redtail Monitoring. The off-site improvement area immediately west and north of the project site was surveyed on April 6, 2016, by RECON archaeologist Harry Price, accompanied by Native American monitor Tushon Phoenix. An additional survey for the remainder of the off-site improvement area east of the project site was conducted on August 23, 2017. That field inspection was conducted by RECON archaeologist Nathaniel Yerka and Native American monitor Gabe Kitchen on foot, in conditions of cloudy skies. These two off-site improvement areas that were surveyed collectively consisted of 6.3 acres.

The Historical Resources Survey also included a record search within a one-mile radius of the archaeological databases maintained at the California Historical Resources Information System, South Coastal Information Center (SCIC) at San Diego State University. The files at the SCIC show a single large site, CA-SDI-12337, covering the entire project site. No previously unrecorded prehistoric historical resources were found during the survey, and limited evidence of CA-SDI-12337 was observed during the survey. Various portions of CA-SDI-12337 have been tested in the past for significance. In all cases, the portion of CA-SDI-12337 (or the portion originally called CA-SDI-5252) being tested was determined not to be a significant historical resource. Based on the Historical Resources Guidelines (found in Section 143.0251 of the City's Land Development Code, which serve to protect, preserve, and, where damaged, restore the historical resources) and framework mitigation measures presented in OMCPU Final PEIR, it was determined that due to the small number of artifacts observed, the lack of artifact concentrations, and the repeated testing of other portions of the site with determinations of not significant, a testing program for the portion of CA-SDI-12337 on the project site was not recommended. However, excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Therefore, monitoring during ground-disturbing

activities would be required, consistent with OMCPU Final PEIR mitigation framework measure HIST-1. As documented in the Historical Resources Survey, The Native American community has recommended that a Native American monitor be present during ground-disturbing activities (RECON 2017a). Implementation of mitigation measures MM-HIST-1, as stated in Section VI, MMRP would reduce impacts related to historical resources to a level less than significant.

Built Environment

There are no historic buildings, structures, or objects on the project site. Therefore, the Retail Alternative would not impact a historic resource, and OMCPU Final PEIR mitigation framework measure HIST-2 would not apply.

Human Remains

No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during ground disturbing activities. 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 OMCPU Final EIR. The project would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

An Addendum to the Results of Historical Resources Survey of the La Media Retail Project was prepared by RECON (RECON 2020a), which determined that impacts associated with the Industrial Alternative would be identical to those identified for the Retail Alternative. The on-site impact footprint for the Industrial Alternative would be identical to the impact footprint of the Retail Alternative evaluated in the Historical Resources Survey Report, as stated above. While the Industrial Alternative includes the same off-site improvements located on the western and northern boundaries as the Retail Alternative, the off-site improvement area to the east of the project site has been excluded. The Sunroad Otay 50 Project immediately adjacent to the eastern boundary of the project site has been entitled for development. This entitlement has been secured by the project applicant proposing the Industrial Alternative evaluated in this addendum. Therefore, the Sunroad Otay 50 Project would be constructed first, and the Industrial Alternative would not result in any new impacts to, or be responsible for, mitigation for the off-site improvement area east of the project site. The development footprint of the Industrial Alternative is located entirely within the area of potential effect evaluated within the Results of Historical Resources Survey Report completed for the Commercial Retail Alternative. Therefore, potential impacts to historic resources associated with the Industrial Alternative would be the same as those that would occur under the Retail Alternative described above.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Health and Safety/Hazardous Materials

OMCPU Final Program EIR

Section 5.6 of the OMCPU Final PEIR provides an analysis of health and safety/hazardous materials impacts associated with the OMCPU. 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 less than significant level. 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 OMCPU 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 less than significant level.

The OMCPU Final PEIR concluded that impacts associated with hazardous substances would be less than significant, as future projects within the OMCPU area would be required to comply with policies contained in the General Plan, the OMCPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency, Resource Conservation and Recovery Act, California Department of Health Services, County of San Diego Department of Environmental Health, and Caltrans. In addition, the OMCPU designated truck routes within the OMCPU area along roadway improvements in conjunction with buildout of the circulation network, which would reduce the potential risk of exposure from hazardous materials to people residing or working within the OMCPU as a result of transporting hazardous materials. Compliance with existing regulations would ensure impacts associated with health hazards and hazardous substances would be 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 OMCPU could result in significant impacts to future development within the OMCPU area. The mitigation framework contained in the OMCPU Final PEIR included measure HAZ-3, which would reduce potential hazardous site impacts to a less than significant level.

Retail Alternative

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. While vacant lands occur to the south and east, the project site is surrounded by major roads on three sides, including Otay Mesa Road to the north, La Media Road to the west, and the westbound SR-905 off-ramp to the south. Commercial/industrial land uses occur to the north, west, and southeast of the project site, and BMA is located immediately to the northwest of the project site across the intersection of Otay Mesa Road and La Media Road. Furthermore, San Diego Fire-Rescue Department Station 43 is located approximately 200 feet north of the northwest corner of Otay Mesa Road and La Media Road, which would provide immediate emergency response in the event of a wildfire. Additionally, the Retail Alternative has been designed

consistent with City Fire Department Policies A-93-1 and A-96-1 related to fire access. Therefore, impacts related to wildfires would be less than significant.

The project site is located within the Airport Influence Area - Review Areas 1 and 2 of BMA, and within the FAA Part 77 Notification Area for BMA. FAA reviewed the Retail Alternative, submitted five letters, and determined this alternative would not be a hazard to air navigation (FAA 2020). Regarding Airport Safety Compatibility Zones, the Retail Alternative is located within Safety Zone 6 (Traffic Pattern Zone) of the BMA Airport Influence Area. The safety compatibility of proposed land use actions is evaluated in accordance with the policies of the ALUCP Table III-2 which identifies land use type as being either "incompatible," "conditionally compatible," or "compatible" within each safety zone. Lands within Safety Zone 6 have no limit on the intensity of use and allows 100 percent lot coverage. Additionally, commercial and retail uses are considered compatible within Zone 6. Therefore, Retail Alternative land uses would be compatible with ALUCP for BMA, and impacts would be less than significant. Therefore, impacts related to aircraft would be less than significant.

Construction of the Retail Alternative may require the use of small amounts of solvents and petroleum products. However, these materials would not be acutely hazardous and use of these common materials in small quantities would not result in a significant hazard to the public or environment. Standard construction BMPs would be employed during construction to ensure proper handling of hazardous material.

During operation of the proposed commercial buildings, small amounts of common hazardous materials would be used such as cleaners, degreasers, and solvents. These uses would not require the routine transport, use or disposal of hazardous materials. The proposed 12-pump gas station would involve routine transport and underground storage of fuels. The gas station would utilize a 20,000-gallon underground storage tank for liquid gasoline (Class 1B) and a 5,000-gallon underground storage tank for liquid diesel (Class 2). During operation of the proposed uses, typical hazardous materials would be managed in accordance with a Hazardous Materials Business Plan, required upon issuance of a building permit. The San Diego County Department of Environmental Health Hazardous Materials Division (DEH HMD) is the Certified Unified Program Agency (CUPA) for San Diego County responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, the DEH HMD is required to regulate hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk management plans. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of onsite. The plan also contains an emergency response plan which describes the procedures for mitigating a hazardous release, procedures, and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the HMD, the Office of Emergency Services, and other emergency response personnel such as the local Fire Agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts. Furthermore, the DEH HMD is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to recommend preventative measures to minimize the risk of a spill or release of hazardous substances. Therefore, due to the strict requirements that regulate hazardous substances outlined above and the fact that the initial planning, ongoing monitoring, and inspections will occur in compliance with local, State, and Federal regulation; the Retail Alternative will not result in any potentially significant impacts related to the routine transport, use, and

disposal of hazardous substances or related to the accidental explosion or release of hazardous substances.

Review of the State Water Resources Control Board Geotracker (2019) and Department of Toxic Substances Control Envirostor (2019) databases did not identify any contaminated sites on or adjacent to the site. Furthermore, the project site was not identified on the Department of Toxic Substance Control Cortese List. None of the potentially significant hazardous materials sites identified in Section 5.1.6.2 of the OMCPU Final PEIR are located within or adjacent to the project site. However, Table 5.6-1 of the OMCPU Final PEIR identified the Otay Mesa Widening Project as a property of environmental concern located adjacent to the north and south of Otay Mesa Road. Although the OMCPU Final PEIR did not identify whether this property of environmental concern is located within the project site, it stated that no mitigation measures are anticipated to be required should project grading within the vicinity of this site be needed. Review of the Geotracker Database determined that the case for the Otay Mesa Widening Project has subsequently been closed. Therefore, impacts related to hazardous materials on the project site would be less than significant.

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

Industrial Alternative

Impacts associated with the Industrial Alternative would be identical to those identified for the Retail Alternative. This alternative would utilize the same development footprint as the Retail Alternative and would have the same level of impact related to hazardous materials on-site or within the vicinity of the project. San Diego Fire-Rescue Department Station 43 is located at the northwest corner of Otay Mesa Road and La Media Road, approximately 500 feet from the project site, which would provide immediate emergency response in the event of a wildfire. The proposed industrial buildings would have a maximum height of 40 feet. The FAA reviewed the Industrial Alternative and determined this alternative would not be a hazard to air navigation (FAA 2020). This alternative would be consistent with the ALUCP for the BMA. Use of small amounts of solvents and petroleum products during construction are not anticipated to result in a significant hazard to the public as all standard construction BMPs would be employed such as proper fuel storage and containment areas. Similar to the commercial uses discussed above, operation of the industrial uses could involve small amounts of routine hazardous materials. Storage and handling of these materials would be in compliance with all applicable regulations as discussed above under the Retail Alternative.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Hydrology and Water Quality

OMCPU Final Program EIR

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

The OMCPU Final PEIR determined that impacts to natural drainage systems would be potentially significant, as buildout in accordance with the OMCPU 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 less than significant level.

The OMCPU Final PEIR concluded that impacts associated with flow alteration would be potentially significant, as future development within the OMCPU area would potentially impact the existing course and flow of flood waters due to the presence of floodplains within the OMCPU 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 less than significant level.

The OMCPU Final PEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the OMCPU could result in discharges to surface water or groundwater. Grading and exposed soil could result in sedimentation. Residential development could result in the discharge of sediment, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Commercial development could result in discharge of sediment, nutrients, organic compounds, oxygen-demanding substances, pesticides, and bacteria and viruses. 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. 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 less than significant level.

Retail Alternative

Consistent with the OMCPU Final PEIR mitigation framework, and City regulations, a site-specific Preliminary Drainage Report (Drainage Report) and Storm Water Quality Management Plan (SWQMP) were completed by Chang Consultants (Chang Consultants 2019a and 2019b) for the Retail Alternative.

The Drainage Report assessed pre- and post-project runoff conditions for the project site. Under existing, pre-project conditions, on-site storm runoff flows in two directions. The majority of the on-site runoff (combined with off-site runoff from the undeveloped area to the east) sheet flows in a southwest direction over the gently sloping ground surface. This runoff is conveyed to a storm drain at the southwest corner of the site that connects to existing Caltrans box culverts along the westerly property boundary.

Storm runoff from a smaller on-site area along the northerly boundary is conveyed by a small natural swale to a storm drain at the northwest corner. This storm drain also connects to the existing Caltrans box culverts. A portion of the existing runoff within the south half of Otay Mesa Road flows onto the site from small spillways along the roadway, which then combines with the on-site runoff and is collected by the Caltrans box culverts.

Project development would maintain the overall existing condition on-site drainage patterns. The majority of on-site and tributary off-site runoff would continue to be conveyed to the Caltrans culverts along the westerly project boundary. Project runoff would enter the Caltrans culverts through the existing storm drain near the southwest corner of the site as well as at two new connection points to be constructed midway along the site. On-site runoff would be collected and conveyed by proposed private drainage facilities (inlets, pipes, curb and gutter, parking lots, etc.) and treated by a series of ten biofiltration basins before entering the Caltrans culverts (Chang Consultants 2019a). The Retail Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain.

Otay Mesa Road would be widened and improved with curb, gutter, and sidewalk along the site. Off-site runoff from the tributary portion of Otay Mesa Road would be conveyed by a proposed storm drain system in the street into the Caltrans culverts near the northwest corner of the site. These street improvements would meet green street requirements. There is a small area of project runoff along the easterly boundary that would be conveyed to the adjacent property to the east, which includes a portion of the project's access driveway on the adjacent parcel. The project applicant has coordinated with adjacent property owners to identify a temporary biofiltration basin on the adjacent undeveloped property. Once the adjacent property to the east is developed, it would include a permanent BMP to treat the small area of run-on from the project site.

Under existing conditions, storm runoff from the undeveloped Sunroad Otay 50 Project site sheet flows westerly onto the project site, at which point it then combines with on-site runoff and enters the Caltrans culverts. Project design would redirect this off-site runoff to an existing culvert to the south and would utilize a detention basin to avoid impacting the culvert to the south. A temporary detention basin would be constructed on the adjacent Sunroad Project site, which would be replaced with a permanent solution once the Sunroad Project site is developed.

The Drainage Report documented that the Retail Alternative would reduce flow rates under the 5-, 10-, 25-, 50-, and 100-Year storm events as follows:

- Reduce the 5-Year flow rate from 39 cubic feet per second (cfs) in the existing condition to 29 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 47 cfs in the existing condition to 34 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 52 cfs in the existing condition to 37 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 61 cfs in the existing condition to 43 cfs in the post-project condition.
- Reduce the 100-Year flow rate from 66 cfs in the existing condition to 45 cfs in the post-project condition (Chang Consultants 2019a).

The Retail Alternative would not increase the flow rates entering the Caltrans culverts under any of the storm events because storm runoff from the off-site area to the east would be detained and directed to a southerly culvert. The temporary detention basin would mitigate the off-site area flows. There is a minor amount of flow that would be discharged onto the Sunroad Otay 50 Project site to the east that would be treated by a temporary biofiltration basin and conveyed through the Sunroad Otay 50 Project site. The drainage facilities and BMP would be further coordinated during final engineering to verify the preferred location and method of the discharge and treatment as well as integration with the Sunroad Otay 50 Project's ultimate development and timing of their site. Therefore, impacts related to drainage and runoff would be less than significant. As described in the biological resources section, there are no jurisdictional drainages or wetlands on site. Therefore, the Retail Alternative would not require permits from the Regional Water Quality Control Board (RWQCB) or ACOE under Federal Clean Water Act (CWA) Section 401 or 404, respectively.

According to the City's Storm Water Requirements Applicability Checklist, the Retail Alternative 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). Infiltration testing determined that infiltration rates at the project site range from approximately 0.002 to 0.01 inches per hour. Additionally, highly expansive clay with very low permeability characteristics were identified in the upper 10 feet of soils beneath the surface. Testing also determined that there is a high probability for lateral water migration because of presence of interlayered permeable sands beds within the very old paralic deposits. Based on the results of the field infiltration tests, full or partial infiltration should be considered infeasible (Chang 2019b). Therefore, design of the Retail Alternative includes ten biofiltration basins as pollutant and flow control BMPs at various locations throughout the site. The SWQMP identified 22 Drainage Management Areas (DMAs). DMAs 1 through 10 and 12 through 16 would drain to one of the ten biofiltration basins throughout the site. DMAs 12 and 13 would have dual BMPs that are hydraulically connected. DMA 11 is a self-mitigating site, and DMAs 17 through 19 meet the green street exemption. DMAs 20 and 21 would be de minimus areas, and DMA 22 would drain to an impound. The proposed biofiltration basins would also provide detention for hydromodification requirements and would accommodate the additional runoff generated in the post-project condition. BMPs 1, 2, and 6 would include flood storage easements to detain runoff during the 100-year storm events. Each biofiltration basin would be sized for the impervious and pervious area within its tributary drainage area and would be designed consistent with current pollutant control and flow control requirements per the City's 2018 Storm Water Standards. The biofiltration basin areas contain overflow catch basins set approximately 12 inches above the basin floors to convey the flow rates in excess of the water quality flows. Therefore, impacts related to water quality would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

An Addendum to the Drainage Report and an Addendum to the SWQMP were completed by Kimley-Horn and Associates Inc. (Kimley-Horn) to evaluate impacts associated with the Industrial Alternative (Kimley-Horn 2020a and 2020b). Both addendums determined that impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. The

majority of on-site and tributary off-site runoff would continue to be conveyed to the Caltrans culverts along the westerly project boundary. Project runoff would enter the Caltrans culverts through the existing storm drain near the southwest corner of the site. The Industrial Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain. The Addendum to the Drainage Report determined that the Industrial Alternative would maintain the overall existing condition on-site drainage patterns. The Addendum to the Drainage Report documented that the Industrial Alternative would reduce flow rates under the 5-, 10-, 25-, 50-, and 100-Year storm events as follows:

- Reduce the 5-Year flow rate from 39.0 cubic feet cfs in the existing condition to 13.2 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 47.0 cfs in the existing condition to 15.1 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 52.0 cfs in the existing condition to 16.9 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 61.0 cfs in the existing condition to 19.6 cfs in the post-project condition.
- Reduce the 100-Year flow rate from 66.0 cfs in the existing condition to 21.3 cfs in the post-project condition (Kimley-Horn 2020a).

Therefore, impacts related to drainage and runoff would be less than significant. As described in the Biological Resources section above, there are no jurisdiction drainages or wetlands on site. Therefore, the Industrial Alternative would not require permits from the RWQCB or ACOE under federal CWA Section 401 or 404.

As described for the Retail Alternative above, field infiltration tests determined that full or partial infiltration should be considered infeasible at the project site (Chang 2019b). The Addendum to the SWQMP documented that the Industrial Alternative would implement required structural BMPs for storm water pollutant control by installing one biofiltration basin along the southern boundary of the project site, a second biofiltration basin in the southeastern corner of the project site, and vegetated swales with trees along the western and northern project site boundaries. The Addendum to the SWQMP identified two DMAs, each of which would drain to one of the proposed biofiltration basins. The proposed biofiltration basins would also provide detention for hydromodification requirements and would accommodate the additional runoff generated in the post-project condition. BMPs 1 and 2 would include flood storage easements to detain runoff during the 100-year storm events. These structural BMPs would be consistent with City requirements documented in the BMP Design Manual Chapter 5, Part 1 of Storm Water Standards.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts result from that described in the OMCPU Final PEIR.

Geology/Soils

OMCPU Final Program EIR

Section 5.8 of the OMCPU Final PEIR provides an analysis of geology and soils impacts associated with the OMCPU. 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 potentially active and would subject the OMCPU 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 OMCPU area are underlain by undocumented fill, colluvium/topsoil, and alluvium, which are typically loose, dry, and contain rubble and are considered compressible. For future projects underlain by compressible soils, removal and replacement by compacted fill would be required. Regarding expansive soils, the OMCPU 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 OMCPU 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 OMCPU 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 less than significant level.

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 OMCPU 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 NPDES permit requirements. Implementation of this measure would reduce impacts associated with erosion to a less than significant level.

Retail Alternative

A site-specific Geotechnical Investigation was prepared for the Retail Alternative by GEOCON, Inc. (GEOCON 2017). The City Seismic Safety Study, Geologic Hazards and Faults, 2008 Edition, Map Sheets 3 and 7 define the site as Hazard Category 53: Level or Sloping Terrain, unfavorable geologic structure, low to moderate risk. The project site is not known to be underlain by an active, potentially active, or inactive fault, and is not located within an Earthquake Fault Zone. According to the above-referenced report, the nearest known active fault is the Newport-Inglewood/Rose Canyon Fault located approximately 11 miles west of the site. Further the risk associated with landslides, liquefaction, ground rupture, subsidence and seismic settlement were determined to be low. Therefore, impacts associated with these geologic hazards would be less than significant.

The site is underlain by undocumented fill, topsoil, Old Paralic Deposits (formerly Lindavista Formation), and Otay Formation underlies the Very Old Paralic Deposits. The Geotechnical Investigation determined that the existing undocumented fill, topsoil and the upper clay of the Very Old Paralic Deposits exhibited a high to very high expansion potential (Expansion Index higher than 91). The Otay Formation exhibits low to medium expansion characteristics and should provide adequate support for compacted fill and structural loads. However, the soil of this geologic formation is not expected to be encountered due to its depth below proposed grades. Therefore, the Geotechnical Investigation recommended that compressible surficial deposits (undocumented fill, topsoil, or weathered Very Old Paralic Deposits) within areas of planned grading should be

completely removed and recompacted prior to placement of additional fill. The actual extent of unsuitable soil removals should be evaluated in the field by the geotechnical engineer or engineering geologist. Once all unsuitable soils and deleterious materials have been removed, areas planned to receive structural fill soils and/or settlement-sensitive improvements should be scarified to a depth of approximately 12 inches, moisture conditioned to 1 to 3 percent above optimum moisture content and compacted to a minimum relative compaction of 90 percent. Furthermore, adherence to these recommendations would ensure that impacts related to compressible and expansive soils would be less than significant. The Geotechnical Investigation did not identify any landslides at the project site or that were mapped in an area that could impact the property. Therefore, the risk associated with landslide hazard is low for the Retail Alternative. Furthermore, the Geotechnical Investigation provided recommendations for construction of the Retail Alternative that would ensure slope stability.

Based on the results of the Geotechnical Investigation, construction on the project site would be feasible from a geotechnical standpoint. Additionally, the Retail Alternative would be required to comply with the California Building Code that would reduce impacts to people or structures to an acceptable level of risk. 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 less than significant.

Regarding erosion, a site-specific SWQMP was prepared by Chang Consultants (2019b) documenting that the project would be required to prepare a Storm Water Pollution Prevention Plan in order to implement construction BMPs in accordance with the performance standards documented in the City's Storm Water Standards Manual. Therefore, impacts related to erosion would be less than significant.

The project site is located 10 miles inland from the coast, at approximately 475 to 485 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 Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

An Addendum to the Geotechnical Investigation was prepared by GEOCON (GEOCON 2020), which determined that impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. GEOCON determined that the Industrial Alternative would utilize the same development footprint and would grade and excavate within the same geologic conditions as the Retail Alternative. Therefore, construction would be feasible from a geotechnical standpoint as described above for the Retail Alternative.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Energy Conservation

OMCPU Final Program EIR

Section 5.9 of the OMCPU Final PEIR provides an analysis of energy conservation impacts associated with the OMCPU. Energy use associated with a project typically includes fuel (e.g., 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 (SDG&E) 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 OMCPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the OMCPU. In addition, the OMCPU Final PEIR concluded that implementation of the OMCPU 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 OMCPU 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 (CPU 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 OMCPU, state and local mandates for energy conservation, and the energy reduction measures set forth in the OMCPU policies outlined above. Impacts associated with energy use would be less than significant.

Retail Alternative

Energy used during construction of the Retail Alternative would not be considered significant given the short-term nature of the energy consumption. In regard to long-term, operational-related energy consumption, the Retail Alternative would be consistent with the land use and zoning designations analyzed in the OMCPU Final PEIR, and development of the Retail Alternative would not result in any new or more severe impacts related to electrical power or fuel consumption in comparison to what was previously analyzed. That is, the Retail Alternative 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 Retail Alternative 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. There are no known conditions in the Retail Alternative area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical fuel consumption rates. Therefore, the Retail Alternative would not result in the use of excessive amounts of fuel or other forms of energy (electricity or natural gas) during construction. Impacts would be less than significant.

The Retail Alternative would be required to meet the mandatory energy requirements of California Green Building Standards Code 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 efficient than previous versions. The Retail Alternative would be required to comply with policies contained in the Community Plan Urban Design Element (see Policies 4.9-1 through 4.9-5 outlined 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. Additionally, the Retail Alternative would reduce overall vehicle miles traveled in the community by providing regional shopping within proximity to existing and future development, and thereby eliminating the need to travel to shopping centers at further distances.

The Retail Alternative 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 envelope, mechanical systems, electrical systems, plumbing, etc. The Retail Alternative 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 Retail Alternative 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 (Smith Consulting Architects 2019). Additionally, the Retail Alternative would be served by SDG&E, which currently has an energy mix that includes 43 percent renewable energy and is on track to achieve 50 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Therefore, the Retail Alternative 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. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to or less than those identified for the Retail Alternative. Traffic modeling for the Industrial Alternative determined that it would generate 2,054 ADT, which would be 6,606 ADT less than the cumulative ADT of 8,660 projected for the Retail Alternative (RICK Engineering 2021). Thus, even though the Industrial Alternative would include more truck trips than the Retail Alternative, the Industrial Alternative would consume less transportation-related fuel because the overall ADT would be much less. Similar to the Retail Alternative, the Industrial Alternative would be required to comply with the mandatory energy standards of the current California energy code, Title 24 Building Energy Standards of the California Public Resources Code, and energy conservation requirements of the CAP Checklist. Additionally, the Industrial Alternative would be served by SDG&E, which currently has an energy mix that includes 43 percent renewable energy and is on track to achieve 50 percent renewable energy content by 2030 as required by the State of California's Renewable Portfolio Standards. Therefore, the Industrial Alternative would not support the use of excessive amounts of energy, create unnecessary energy waste, or conflict with any adopted plan for renewable energy efficiency.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR occur.

Noise

OMCPU Final Program EIR

Section 5.10 of the OMCPU Final PEIR provides an analysis of noise impacts associated with the OMCPU. 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 NE-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, Otoy 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 OMCPU 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 OMCPU 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 BMA would be considered conditionally compatible with these noise levels from operations as BMA is located immediately northwest of the project site and the General Abelardo L. Rodriguez International Airport is located approximately 1.4 miles 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 OMCPU 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 OMCPU area could result in short-term, temporary noise impacts affecting coastal California

gnatcatchers, raptors, and other sensitive species within the MHPA. In order to reduce potentially significant impacts associated with construction noise, the 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.

Retail Alternative

The primary noise source in the vicinity of the project site is vehicular traffic on adjacent and nearby roadways from SR-905, Otay Mesa Road, and La Media Road. The site is also exposed to aircraft noise levels less than 60 dB(A) CNEL from operations associated with BMA (i.e., outside the 60 CNEL contour). Other existing ambient noise levels at the project site consist of activities and equipment at adjacent industrial and commercial properties. Based on the noise level measurements taken as a part of the Program EIR, ambient noise levels in Otay Mesa ranged from 61.5 to 80.9 dB(A) sound equivalent level (L_{eq}). Ambient noise levels adjacent to SR-905 were measured to be 72.0 dB(A) L_{eq} .

Mitigation Framework NOI-1 and NOI-2 do not apply to the Retail Alternative because they are related to noise exposure to residential uses and sensitive receptors, and the Retail Alternative does not include any sensitive receptors. Therefore, a site-specific acoustical analysis was not required for the Retail Alternative. Mitigation Framework 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 Retail Alternative since the project site is not located in, near, or in close proximity to a sensitive receptor. However, the Retail Alternative 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 residential uses are located more than two miles west of the project site. Construction noise levels at this distance would not be audible over the existing ambient noise levels dominated by vehicle traffic. As discussed, ambient noise levels in Otay Mesa ranged from 61.5 to 80.9 dB(A) L_{eq} , and ambient noise levels adjacent to SR-905 were measured to be 72.0 dB(A) L_{eq} . The San Diego Fire-Rescue Department Station 43 is located at the northwest corner of Otay Mesa Road and La Media Road, approximately 500 feet from the project site. Hourly average noise levels from the grading phase of construction would be 82 dB(A) L_{eq} at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously. This noise level would attenuate to 62 dB(A) L_{eq} at 500 feet. Thus, construction noise levels would not exceed 75 dB(A) $L_{eq(12)}$ at the fire station. The project site is not located adjacent to the MHPA, Therefore, standard MSCP Land Use adjacency and OMCPU Final PEIR mitigation framework measure LU-2 do not apply to the Retail Alternative.

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.

Retail Alternative construction equipment used during site grading and excavation would have the greatest potential to generate vibrations. Construction equipment would include equipment such as loaded trucks, excavators, dozers, and loaders. Project construction would not include any pile driving or blasting. 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. As described in the discussion of construction noise above, the nearest residential uses are located more than two miles west of the project site. 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 Retail Alternative would not be a source of groundborne vibration.

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 regional shopping center. On-site stationary sources of noise associated with the Retail Alternative include the proposed carwash, parking activities, loading docks, and heating, ventilation, and air conditioning 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 9.

| Table 9 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. | 50 |
| | 7:00 p.m. to 10:00 p.m. | 45 |
| | 10:00 p.m. to 7:00 a.m. | 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. | 55 |
| | 7:00 p.m. to 10:00 p.m. | 50 |
| | 10:00 p.m. to 7:00 a.m. | 45 |
| All other Residential | 7:00 a.m. to 7:00 p.m. | 60 |
| | 7:00 p.m. to 10:00 p.m. | 55 |
| | 10:00 p.m. to 7:00 a.m. | 50 |
| Commercial | 7:00 a.m. to 7:00 p.m. | 65 |
| | 7:00 p.m. to 10:00 p.m. | 60 |
| | 10:00 p.m. to 7:00 a.m. | 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 Retail Alternative proposes a commercial land use and is located adjacent to other commercial and industrial land uses. The applicable property line noise level limits between project site and the adjacent commercial uses are 65 dB(A) L_{eq} between 7:00 a.m. and 7:00 p.m. and 60 dB(A) L_{eq} between 7:00 p.m. and 7:00 a.m. The applicable property line noise level limits between project site and the adjacent industrial uses are 70 dB(A) L_{eq} between 7:00 a.m. and 7:00 p.m. and 67.5 dB(A) L_{eq} between 7:00 p.m. and 7:00 a.m.

The loudest on-site stationary noise source associated with the Retail Alternative would be the proposed carwash. Noise sources at carwashes include blowers/dryers, vacuums, and other mechanical equipment. Based on noise studies prepared for carwashes that include this equipment, at the loudest noise exposure location in front of the carwash tunnel exit with blowers/dryers, the 65 dB(A) L_{eq} noise contour occurs approximately 55 feet from the blowers/dryers, and the 60 dB(A) L_{eq} noise contour occurs approximately 100 feet from the blowers/dryers. The proposed carwash would be located on Lot 10 (see Figure 3-Retail Alternative Site Plan) at the northeast corner of the project site. This lot is located more than 200 feet from the adjacent property line to the north, and more than 150 feet from the property line to the east. Therefore, due to the distance between the carwash and the adjacent properties, noise levels are not anticipated to exceed the most restrictive noise level limit of 60 dB(A) L_{eq} .

All other stationary noise sources on the project site would generate noise levels similar to noise from existing adjacent retail, commercial, and industrial developments. As discussed previously,

there are no sensitive land uses located in the vicinity of the project site. The nearest residential uses are located more than two miles west of the project site. Noise generated on the project site would not be audible at this distance. Additionally, based on standard operational characteristics of regional shopping centers, it is not anticipated the Retail Alternative would generate noise levels in excess of the commercial property line noise level limits established in Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to or less than those identified for the Retail Alternative. Per Table NE-3 of the General Plan, industrial uses are "compatible" with exterior noise levels up to 75 CNEL. Additionally, based on the City's CEQA Significance Thresholds, the traffic noise significance threshold at exterior useable space is 75 CNEL for industrial uses. Based on the vehicle traffic noise contours calculated in the OMCPU Final PEIR, noise levels would not exceed 75 CNEL. In regard to stationary source noise, operational noise sources would include vehicles and trucks arriving and leaving, loading docks, and mechanical equipment. The proposed industrial uses would be similar to the surrounding commercial/industrial land uses occur to the north, west, and southeast of the project site. Therefore, noise levels generated on the project site would be similar to the surrounding environment. Additionally, as discussed for the Retail Alternative above, there are no sensitive land uses located in the vicinity of the project site. The nearest residential uses are located more than two miles west of the project site. It is not anticipated that the Industrial Alternative would generate noise levels in excess of the noise level limits established in Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. Vibration impacts associated with construction of the Industrial Alternative would be the same as those discussed for the Retail Alternative because construction would require the same types of construction equipment. The Industrial Alternative also would not be an operational source of groundborne vibration.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Paleontological Resources

OMCPU Final Program EIR

Section 5.11 of the OMCPU Final PEIR determined that impacts on paleontological resources would be potentially significant. Buildout of the OMCPU would occur within approximately 352 acres designated with high paleontological sensitivity, approximately 1,505 acres designated with moderate sensitivity, and less than 1 acre designated with low 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.

Retail Alternative

According to the site-specific Geotechnical Investigation prepared by GEOCON, Inc. (GEOCON 2017), the site is underlain by undocumented fill, topsoil (unmapped), Very Old Paralic Deposits (formally known as Lindavista Formation), and Tertiary-age Otay Formation. The artificial fill and topsoil have a zero-sensitivity rating, whereas Very Old Paralic Deposit has a moderate sensitivity rating and Tertiary-age Otay Formation has a high sensitivity rating for paleontological resources.

Implementation of the Retail Alternative would require approximately 10,000 cubic yards (cy) of cut and 185,000 cy of fill, and a net import of 175,000 cy of soil. The maximum depth of cut would be zero feet, and the maximum height of fill slopes would be 9 feet. Otay Formation would not be encountered during excavation activities. The project would install the two USTs associated with the gas station proposed in the northeastern corner of the project site on Lot 10 (Building K). This would necessitate excavation of 2,000 cy to a depth of ten feet below the finished grade. Since site preparation would raise the elevation of the project site approximately 9 feet, this excavation activity to a depth of 10 feet would occur within fill soil. Therefore, development of the Retail Alternative would not meet the City's significance threshold of greater than 2,000 cy of excavation and 10 feet in depth or greater within a moderate resource potential geologic deposit/formation/rock unit, and greater than 1,000 cy and 10 feet deep or greater in a high resource potential geologic deposit/formation/rock unit (City of San Diego 2016), monitoring will not be required. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be less than those identified for the Retail Alternative. This alternative would utilize the same development footprint as the Retail Alternative. The Industrial Alternative would require approximately 900 cy of cut and 184,340 cy of fill, and the import of 183,440 cy of soil. The earthwork excavation of 900 cy of cut would not exceed the City's significance threshold for paleontological resources as detailed in the framework measures of PEIR and the City's 2016 CEQA Significance Determination Thresholds. Therefore, the Industrial Alternative would not have the potential to impact paleontological resources. No impact would occur.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Transportation/Circulation

OMCPU Final Program EIR

Section 5.12 of the OMCPU Final PEIR provides an analysis of transportation/circulation impacts associated with the OMCPU. 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 (LOS), resulting in significant roadway segment impacts. A total of 49 intersections would be expected to operate at unacceptable LOS 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 LOS 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 OMCPU 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 OMCPU 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 lanes 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.

Retail Alternative

A site-specific Transportation Impact Study (TIS) was completed for the Retail Alternative by RICK Engineering (RICK Engineering 2021).

Methodology

Potential traffic impacts were analyzed using the 2000 and 2010 Highway Capacity Manual and compared to the City LOS criteria for intersections and roadway segments. The study freeway segments were evaluated based on the Caltrans District 11 method, which is based on the volume-to-capacity ratios according to LOS thresholds and per lane capacity for each direction of travel during the peak hours. The freeway ramp metering analysis was performed using the methodology provided in Appendix 2 of the City Traffic Impact Study Manual.

Retail Alternative Trip Generation

The TIS utilized trip generation rates, per the City's Trip Generation Manual (May 2003) to estimate traffic that would be generated by the Retail Alternative. Table 10 presents the ADT that would be generated by the Retail Alternative. As shown in Table 10, the Retail Alternative is forecast to generate a total of 14,744 weekday driveway trips per day, with 590 driveway trips occurring during the AM peak hour (339 in, 251 out), and 1,372 driveway trips occurring during the PM peak hour (687 in, 685 out). Taking into consideration pass-by trips, the cumulative trip generation would be 8,660 weekday trips per day on the surrounding roadway network, with 310 trips during the AM peak hour (183 in, 127 out), and 812 trips during the PM peak hour (407 in, 405 out).

Table 10
Trip Generation Summary

| Land Use | Amount | ADT | AM PEAK HOUR | | | PM PEAK HOUR | | |
|---|-----------|---------------|--------------|------------|------------|--------------|------------|--------------|
| | | | In | Out | Total | In | Out | Total |
| Commercial Retail | 106.7 ksf | 7,469 | 134 | 90 | 224 | 374 | 373 | 747 |
| Pharmacy with Drive Through | 13.5 ksf | 1,215 | 29 | 20 | 49 | 61 | 61 | 122 |
| Fast Food Restaurants with Drive-Throughs | 6 ksf | 4,200 | 101 | 67 | 168 | 168 | 168 | 336 |
| Gas Station with Convenience Store and Carwash | 12 vfs | 1,860 | 75 | 74 | 149 | 84 | 83 | 167 |
| <i>Retail Alternative Driveway Trips Total</i> | | 14,744 | 339 | 251 | 590 | 687 | 685 | 1,372 |
| <i>Retail Alternative Cumulative Trips Total ^(a)</i> | | 8,660 | 183 | 127 | 310 | 407 | 405 | 812 |

Notes:

ksf =1,000 square feet, vfs = vehicle fueling space, ADT = average daily traffic

The trip rates for the proposed uses are based on *the City of San Diego's Trip Generation Manual, May 2003*.

^(a) Cumulative trips are based on the cumulative trip rates and do not include pass-by trips.

Source: RICK Engineering 2021

Existing Plus Project Conditions.

The existing roadway network includes Otay Mesa Road, Britannia Boulevard, La Media Road, Airway Road, Siempre Viva Road, and Heritage Road. After the existing traffic counts were initially collected in November 2015, the following changes occurred at the study intersections along La Media Road from Airway Road to Siempre Viva Road:

- Following the restriping of La Media Road to two one-way southbound lanes in conjunction with the interim Otay Port of Entry Truck Route project, the existing signal at the La Media Road/Airway Road intersection was converted to a flashing all red to provide all-way stop control at the intersection.
- The La Media Road/Avenida de la Fuente intersection had previously been controlled as an all-way stop but was converted to one-way stop control after the restriping of La Media Road to one-way southbound.
- The eastbound and westbound approaches of the La Media Road/Siempre Viva Road intersection are currently blocked with k-rail and is currently not operating as an intersection since La Media Road was reconfigured as one-way southbound in conjunction with the interim Otay Port of Entry Truck Route project. However, the existing turning movement counts that were collected before La Media Road was reconfigured are used (with the exception of the northbound approach, eastbound left and westbound right) so that the intersection could be analyzed under existing and Opening Year 2020 conditions.

Additionally, the Existing Plus Project scenario includes the intersection and roadway segment improvements along the Retail Alternative frontage that would be constructed by the Retail Alternative:

- Otay Mesa Road/La Media Road: As part of its frontage improvements, the Retail Alternative will construct two left-turn lanes, two through lanes and one right-turn lane on the northbound approach of the intersection.
- La Media Road Widening: The Retail Alternative will widen La Media Road along the Retail Alternative frontage (from SR-905 Westbound Ramps to Otay Mesa Road) to its ultimate width as a six-lane Prime Arterial with buffered bike lane and raised median.
- Otay Mesa Road Widening: The Retail Alternative will widen eastbound Otay Mesa Road along the Retail Alternative frontage to its ultimate width as a six-lane Prime Arterial with buffered bike lane and raised median.
- Otay Mesa Road/Avenida Costa Azul: The Retail Alternative will construct Avenida Costa Azul as a 4-lane private drive along the eastern Retail Alternative boundary and signalize the intersection at Otay Mesa Road to include one eastbound right-turn lane, one westbound left-turn lane, two northbound left-turn lanes, and one northbound right-turn lane.

All intersections in the Existing Plus Project scenario would operate at acceptable levels with the exception of two intersections. The Retail Alternative would result in significant direct impacts to the following intersections:

- TRA-1: La Media Road/Otay Mesa Road (PM: LOS F)
- TRA-2: Caliente Avenue/Airway Road (AM: LOS F; PM: LOS E)

All roadway segments in the Existing Plus Project scenario would operate at LOS D or better with the exception of two roadway segments. The Retail Alternative would result in significant direct impacts to the following roadway segments:

- TRA-3: La Media Road between SR-905 eastbound ramps and Airway Road (LOS F)
- TRA-4: Airway Road between La Media Road and Avenida Costa Azul (LOS F)

All freeway segments in the Existing Plus Project scenario would operate at LOS B or better. Metering equipment is currently installed, and high-occupancy vehicle (HOV) lanes are currently provided on several freeway on-ramps along SR-905. However, the ramp meters are currently not activated because existing freeway volumes are not high enough to justify activating the ramp meters. It is not expected that freeway volumes under Existing Plus Project conditions would be high enough to justify activating the ramp meters. Therefore, a ramp metering analysis was not performed under Existing Plus Project conditions.

Opening Year 2020 Plus Project Conditions

This scenario evaluated potential impacts based on the addition of Retail Alternative traffic in the Opening Year 2020 conditions. It includes the intersection and roadway segment improvements along the Retail Alternative frontage that would be constructed by the Retail Alternative described under the Existing Plus Project scenario above.

All intersections in the Opening Year 2020 Plus Project scenario would operate at acceptable levels with the exception of two intersections. The Retail Alternative would result in significant direct impacts to the following intersections that were also impacted in the Existing Plus Project scenario:

- TRA-1: La Media Road/Otay Mesa Road (PM: LOS F)
- TRA-2: Caliente Avenue/Airway Road (AM/PM LOS F)

All roadway segments in the Opening Year 2020 Plus Project scenario would operate at LOS D or better with the exception of two roadway segments. The Retail Alternative would result in significant direct impacts to the following roadway segments that were also impacted in the Existing Plus Project scenario:

- TRA-3: La Media Road between SR-905 eastbound ramps and Airway Road (LOS F)
- TRA-4: Airway Road between La Media Road and Avenida Costa Azul (LOS F)

All freeway segments in the Opening Year 2020 Plus Project scenario would operate at LOS B or better. Metering equipment is currently installed and HOV lanes are currently provided on several freeway on-ramps along SR-905. However, the ramp meters are currently not activated because existing freeway volumes are not high enough to justify activating the ramp meters. It is not expected that freeway volumes under Opening Year 2020 Plus Project conditions would be high

enough to justify activating the ramp meters. Therefore, a ramp metering analysis was not performed under Opening Year 2020 Plus Project conditions.

Consistent with the OMCPU Program EIR, the Retail Alternative would include mitigation measures for impacts in the Existing Plus Project and Opening Year 2020 Plus Project scenarios as anticipated under the mitigation framework (see Table 11 below). The Retail Alternative would include Mitigation Measures TRA-1 through TRA-4 (see Mitigation Monitoring and Reporting Plan, below) that would reduce direct impacts TRA-1 through TRF-4 to a level less than significant.

| Table 11 Opening Year 2020 Plus Project Conditions Retail Alternative Mitigation Summary Table | | |
|---|---|--|
| Impact | Mitigation | Significance of Impacts After Mitigation |
| Impact TRA-1: Existing Plus Project and Opening Year 2020 Plus Project impact at La Media Road and Otay Mesa Road Intersection (PM: LOS F) | TRA-1: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of Otay Mesa Road to construct a second left-turn lane at the westbound approach of the intersection, and shall modify the signal to install a right-turn overlap phase on the northbound approach of the intersection, all satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy. | Impacts would be mitigated to a level less than significant. |
| Impact TRA-2: Existing Plus Project and Opening Year 2020 Plus Project impact at Caliente Avenue and Airway Road Intersection (AM/PM LOS F) | <p>TRA-2: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the construction of a traffic signal at the intersection of Caliente Avenue and Airway Road, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.</p> <p>It is suggested that protected left-turn phasing be provided on all intersection approaches. To provide the optimal lane configuration with the installation of a traffic signal, the southbound and eastbound intersection approaches should be restriped to provide the following lane geometrics:</p> <ul style="list-style-type: none"> • Southbound: 1 left-turn lane, 2 through lanes, 1 right-turn lane • Eastbound: 2 left-turn lanes, 1 shared through/right-turn lane <p>Note: The partially completed Southview development will be funding 50 percent of the signal installation. The approved Candlelight project was conditioned to install the traffic signal as mitigation for the project's direct impacts at the intersection.</p> | Impacts would be mitigated to a level less than significant. |
| Impact TRA-3: Existing Plus Project and Opening Year 2020 Plus Project impact at La Media Road between SR-905 EB Ramps and Airway | TRA-3: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of La Media Road to construct a second northbound through lane from Airway Road to approximately 600 feet north of Airway Road, to where the road is already widened to 3 through lanes, | Impacts would be mitigated to a level less than significant. |

| Table 11 Opening Year 2020 Plus Project Conditions Retail Alternative Mitigation Summary Table | | |
|---|---|--|
| Impact | Mitigation | Significance of Impacts After Mitigation |
| Road Roadway Segment (LOS F) | satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy. Construction of a second northbound through lane would upgrade the roadway segment to a four-lane Collector, and the increase in roadway capacity would be sufficient to mitigate the Retail Alternative's significant impact. | |
| Impact TRA-4: Existing Plus Project and Opening Year 2020 Plus Project impact at Airway Road between La Media Road and Avenida Costa Azul Roadway Segment (LOS F) | <p>TRA-4: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of Airway Road to construct a second westbound lane from La Media Road to approximately 900 feet east of La Media Road, to where the road is already widened to two westbound lanes, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.</p> <p>The second westbound lane would function as a through lane and transition to a right-turn lane at the westbound approach of the La Media Road / Airway Road intersection. Widening Airway Road to construct a second westbound through lane would upgrade the roadway segment to a three-lane Collector, and the increase in roadway capacity would be sufficient to mitigate the Retail Alternative's significant direct impact.</p> | Impacts would be mitigated to a level less than significant. |

Horizon Year 2035 Plus Project Conditions

This scenario evaluated potential impacts based on the addition of Retail Alternative traffic in the Horizon Year 2035 conditions.

All intersections in the Horizon Year 2035 Plus Project scenario would operate at acceptable levels with the exception of three intersections. The Retail Alternative would result in significant cumulative impacts to the following intersections:

- TRA-5: La Media Road/Otay Mesa Road (PM: LOS F)
- TRA-6: Britannia Boulevard/Airway Road (PM: LOS F)
- TRA-7: Heritage Road/Otay Mesa Road (AM/PM: LOS F)

All roadway segments in the Horizon Year 2035 Plus Project scenario would operate at LOS D or better with the exception of four roadway segments. The Retail Alternative would result in significant cumulative impacts to the following roadway segments:

- TRA-8: Airway Road between Britannia Boulevard and La Media Road (LOS F)
- TRA-9: Airway Road between La Media Road and Avenida Costa Azul (LOS F)
- TRA-10: Airway Road between Piper Ranch Road and Harvest Road (LOS F)
- TRA-11: Heritage Road between Otay Mesa Road and Datsun Street (LOS F)

All freeway segments in the Horizon Year 2035 Plus Project scenario would operate at LOS D or better. Similarly, all metered freeway on-ramps in the Horizon Year 2035 Plus Project would operate at acceptable levels.

Consistent with the OMCPU Final PEIR, the Retail Alternative would include mitigation measures for impacts in the Horizon Year 2035 Plus Project scenario as anticipated under the mitigation framework (see Table 12 below). The Retail Alternative would include mitigation measures MM-TRA-5 through MM-TRA-11 (see Section VI, MMRP, below) that would reduce impacts TRA-5 through TRF-11 to a level less than significant.

| Table 12 Horizon Year 2035 Plus Project Conditions Retail Alternative Mitigation Summary Table | | |
|--|---|--|
| Impact | Mitigation | Significance of Impacts After Mitigation |
| Impact TRA-5: Horizon Year 2035 Plus Project impact at La Media Road and Otay Mesa Road Intersection (PM: LOS F) | <p>TRA-5: Prior to the issuance of any building permit, the Owner/Permittee shall pay 20.8 percent fair share of funding needed to construct the following intersection improvements, satisfactory to the City Engineer:</p> <ul style="list-style-type: none"> • Southbound: Widen to construct second through lane • Eastbound: Widen to construct second left-turn lane <p>TRA-5 is required in addition to the mitigation measure that is required for the La Media Road and Otay Mesa Road Intersection under Opening Year 2020 conditions (TRA-1).</p> <p>Note: The fair share contribution for TRA-5 only applies once the Owner/Permittee has constructed the second westbound left-turn lane for Mitigation Measure TRA-1.</p> | Impacts would be mitigated to a level less than significant. |
| Impact TRA-6: Horizon Year 2035 Plus Project impact at Britannia Boulevard and Airway Road Intersection (PM LOS F) | <p>TRA-6: Prior to the issuance of any building permit, the Owner/Permittee shall pay 2.3 percent fair share of funding needed to construct the following intersection improvements at the intersection of Britannia Blvd and Airway Rd to be completed in conjunction with PFFP Projects OM T-21.2, OM T-21.3, OM T-10.4, and OM T-10.5, satisfactory to the City Engineer:</p> <ul style="list-style-type: none"> • Northbound: Widen to Construct 1 right-turn lane • Southbound: Restripe to provide second left-turn lane and second through lane at intersection approach. Widen to Construct second southbound through lane on south leg for 300 feet south of Airway Road plus transition taper. • Eastbound: Widen to Construct second left-turn lane and 1 right-turn lane | Impacts would be mitigated to a level less than significant. |

| Table 12 Horizon Year 2035 Plus Project Conditions Retail Alternative Mitigation Summary Table | | |
|---|--|--|
| Impact | Mitigation | Significance of Impacts After Mitigation |
| | <ul style="list-style-type: none"> Westbound: Modify signal to install right-turn overlap | |
| Impact TRA-7: Horizon Year 2035 Plus Project impact at Heritage Road and Otay Mesa Road Intersection (AM/PM: LOS F) | <p>TRA-7: Prior to the issuance of any building permit, the Owner/Permittee shall pay 5.5 percent fair share of funding needed to construct the following intersection improvements to be completed in conjunction with PFFP Projects OM T-16.5 and OM T-16.6, satisfactory to the City Engineer:</p> <ul style="list-style-type: none"> Northbound: Widen to Construct second through lane and 1 right-turn lane Southbound: widen to Construct second left-turn lane and restripe to convert 1 right-turn lane to a second through lane Eastbound: No changes Westbound: Modify signal to install right-turn overlap | Impacts would be mitigated to a level less than significant. |
| Impact TRA-8: Horizon Year 2035 Plus Project impact Airway Road between Britannia Boulevard and La Media Road (LOS F) | <p>TRA-8: Prior to the issuance of any building permit, the Owner/Permittee shall pay 5.0 percent fair share of funding needed to complete PFFP Project OM T-10.5, which would widen and improve the segment of Airway Road between Britannia Blvd and La Media Road to a 4-lane Major Arterial, satisfactory to the City Engineer.</p> | Impacts would be mitigated to a level less than significant. |
| Impact TRA-9: Horizon Year 2035 Plus Project impact at Airway Road between La Media Road and Avenida Costa Azul (LOS F) | <p>TRA-9: Prior to the issuance of any building permit, the Owner/Permittee shall pay 4.8 percent fair share of funding needed to complete PFFP Project OM T-10.6, which would widen and improve the segment to a 4-lane Major Arterial, satisfactory to the City Engineer.</p> <p>TRA-9 is required in addition to the mitigation measure that is required for the segment of Airway Road between La Media Road and Avenida Costa Azul under Opening Year 2020 conditions (TRA-4).</p> | Impacts would be mitigated to a level less than significant. |
| Impact TRA-10: Horizon Year 2035 Plus Project impact at Airway Road between Piper Ranch Road and Harvest Road (LOS F) | <p>TRA-10: Prior to the issuance of any building permit, the Owner/Permittee shall pay 2.6 percent fair share of funding needed to complete PFFP Projects OM T-10.7 and OM T-10.8, which would widen and improve the segment of Airway Road between Piper Ranch Road and Harvest Road to a 4-lane Major Arterial, satisfactory to the City Engineer.</p> | Impacts would be mitigated to a level less than significant. |

| Table 12 Horizon Year 2035 Plus Project Conditions Retail Alternative Mitigation Summary Table | | |
|--|---|--|
| Impact | Mitigation | Significance of Impacts After Mitigation |
| Impact TRA-11: Horizon Year 2035 Plus Project impact at Heritage Road between Otay Mesa Road and Datsun Street Roadway Segment (LOS F) | TRA-11: Prior to the issuance of any building permit, the Owner/Permittee shall pay 4.9 percent fair share of funding needed to complete PFFP Project OM T-16.5, which would widen and improve the segment to a 6-lane Prime Arterial, satisfactory to the City Engineer. | Impacts would be mitigated to a level less than significant. |

As shown in Tables 11 and 12 above, the Retail Alternative would implement mitigation measures MM-TRA-1 through MM-TRA-11 presented in Section VI, MMRP to reduce impacts related to transportation/circulation to a level less than significant.

Alternative Transportation

The Retail Alternative would provide new non-contiguous sidewalks along Avenida Costa Azul, Otay Mesa Road, and La Media Road that would provide pedestrian access to the project site. Internal sidewalks and crosswalks would be provided between each driveway, parking area, and retail building for pedestrian circulation within the site. A Class II bicycle lane is currently provided on northbound La Media Road adjacent to the project site, and the Retail Alternative' frontage improvements along northbound La Media Road would include a Class II buffered bike lane. A shoulder lane is currently provided along eastbound Otay Mesa Road adjacent to the project site, and the project would provide a Class II buffered bike lane with the frontage improvements along eastbound Otay Mesa Road. Therefore, the Retail Alternative would improve pedestrian and bicycle circulation by introducing two Class II bicycle lanes.

There are four (4) existing transit bus stops located within a one-quarter mile walking distance of the project site:

- Bus Stop #1: A bus stop for San Diego Metropolitan Transit System (MTS) Route 905 is provided on southbound La Media Road across from the project site, located approximately 170 feet south of Otay Mesa Road.
- Bus Stop #2: A bus stop for MTS Route 905 is provided on eastbound Otay Mesa Road approximately 900 feet west of La Media Road.
- Bus Stop #3: A bus stop for MTS Route 905 is provided on westbound Otay Mesa Road approximately 1,200 feet west of La Media Road.
- Bus Stop #4: A bus stop for MTS Route 905 is provided on westbound Otay Mesa Road just west of Piper Ranch Road, approximately 1,150 feet east of the future Avenida Costa Azul.

The Retail Alternative does not plan to provide any additional transit bus stops along the Retail Alternative frontage and would not impact any of these existing bus stops. Therefore, the Retail Alternative would not impact transit service.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be less than those identified for the Retail Alternative. Trip generation for the Industrial Alternative was calculated based on the City's Trip Generation Manual, May 2003. Table 13 shows that the Industrial Alternative would generate approximately 2,054 trips per day, with approximately 226 trips during the AM peak hour (203 In, 23 out) and approximately 247 trips during the PM peak hour (49 In, 198 out). Table 14 provides a comparison which shows that the Industrial Alternative would generate 6,606 fewer daily trips, 84 fewer AM peak hour trips, and 565 fewer PM peak hour trips than the Retail Alternative.

| Land Use | Amount | ADT | AM PEAK HOUR | | | PM PEAK HOUR | | |
|-----------------------|------------|-------|--------------|-----|-------|--------------|-----|-------|
| | | | In | Out | Total | In | Out | Total |
| Large Industrial Park | 256,789 sf | 2,054 | 203 | 23 | 226 | 49 | 198 | 247 |
| Total Project Trips | | 2,054 | 203 | 23 | 226 | 49 | 198 | 247 |

ADT = average daily traffic; sf = square feet
 Notes: The trip rates for the proposed uses are based on the City of San Diego's Trip Generation Manual, May 2003.

| Land Use | ADT | AM PEAK HOUR | | | PM PEAK HOUR | | |
|---|--------|--------------|------|-------|--------------|------|-------|
| | | In | Out | Total | In | Out | Total |
| Industrial Alternative | | | | | | | |
| Commercial Retail | 14,744 | 339 | 251 | 590 | 687 | 685 | 1,372 |
| Pass-By Trip Reduction (based on City's cumulative trip rate) | -6,084 | -156 | -124 | -280 | -280 | -280 | -560 |
| Net Project Trips | 8,660 | 183 | 127 | 310 | 407 | 405 | 812 |
| Industrial Alternative | | | | | | | |
| Large Industrial Park | 2,054 | 203 | 23 | 226 | 49 | 198 | 247 |
| Net Difference in Project Trips | -6,606 | +20 | -104 | -84 | -358 | -207 | -565 |

ADT = average daily traffic
 Notes: The trip rates for the proposed uses are based on the City of San Diego's Trip Generation Manual, May 2003.

The Industrial Alternative includes development of frontage improvements located on the western, northern, and eastern property boundaries for frontage and roadway improvements. The acreage and location of these frontage improvements would be the same as for the Retail Alternative (see Figure 5-Industrial Site Plan), except the Industrial Alternative would not include a driveway on La Media Road. A signalized intersection is proposed at the intersection of Otay Mesa Road and the 4-lane private driveway proposed along the eastern boundary of the project site. This intersection would lead to a shared private driveway with the Sunroad Otay 50 project site to the east. As required for the Retail Alternative, the Industrial Alternative would also construct the ultimate half-width improvements on La Media Road and Otay Mesa Road along the project site frontage, including raised median on La Media Road frontage. These frontage improvements also include intersection improvements on the northbound approach of the La Media Road and Otay Mesa Road intersection and an eastbound right-turn lane on Otay Mesa Road at the intersection with the proposed 4-lane private driveway (see Figure 5-Industrial Site Plan). Additionally, the Industrial Alternative proposes an uncontrolled emergency access only right-in-only driveway on Otay Mesa Road along the northern boundary of the site.

Existing Plus Project Conditions

All intersections in the Existing Plus Project scenario would operate at acceptable levels. All roadway segments in the Existing Plus Project scenario would operate at LOS D or better with the exception of two roadway segments. The Industrial Alternative would result in significant impacts to the following roadway segments that were also impacted under the Retail Alternative:

- TRA-3: La Media Road between SR-905 eastbound ramps and Airway Road (LOS E)
- TRA-4: Airway Road between La Media Road and Avenida Costa Azul (LOS F)

However, the addition of Existing Plus Project traffic to existing traffic volumes would result in an increase in volume-to-capacity (v/c) ratio that is less than the City's significance thresholds for roadway segment operations (0.02 for LOS E and 0.01 for LOS F). Therefore, the Existing Plus Project's impact on the above-listed roadway segments would be less than significant and no mitigation measures would be required under Existing Plus Project conditions.

All freeway segments in the Existing Plus Project scenario would operate at LOS B or better. Metering equipment is currently installed and HOV lanes are currently provided on several freeway on-ramps along SR-905. However, the ramp meters are currently not activated because existing freeway volumes are not high enough to justify activating the ramp meters. It is not expected that freeway volumes under Existing Plus Project conditions would be high enough to justify activating the ramp meters. Therefore, a ramp metering analysis was not performed under Existing Plus Project conditions.

Opening Year 2020 Plus Project Conditions

All intersections in the Opening Year 2020 Plus Project scenario would operate at acceptable levels with the exception of one intersection. The Industrial Alternative would result in significant direct impacts to the following intersection that was also impacted under the Retail Alternative:

- TRA-2: Caliente Avenue and Airway Road (AM/PM LOS F)

All roadway segments in the Opening Year 2020 Plus Project scenario would operate at LOS D or better with the exception of two roadway segments:

- TRA-3: La Media Road between SR-905 eastbound ramps and Airway Road (LOS F)
- TRA-4: Airway Road between La Media Road and Avenida Costa Azul (LOS F)

However, the addition of the Industrial Alternative traffic to Opening Year 2020 traffic volumes would result in an increase in v/c ratio that is less than the City's significance thresholds for roadway segment operations (0.02 for LOS E and 0.01 for LOS F). Therefore, the Industrial Alternative's impact on the above-listed roadway segments would be less than significant and no mitigation measures would be required under Opening Year 2020 conditions.

All freeway segments in the Opening Year 2020 Plus Project scenario would operate at acceptable levels. Metering equipment is currently installed and HOV lanes are currently provided on several freeway on-ramps along SR-905. However, the ramp meters are currently not activated because existing freeway volumes are not high enough to justify activating the ramp meters. It is not expected that freeway volumes under Opening Year 2020 Plus Project conditions would be high

enough to justify activating the ramp meters. Therefore, a ramp metering analysis was not performed under Opening Year 2020 Plus Project conditions.

Consistent with the OMCPU Final PEIR, the Industrial Alternative would include mitigation measures for impacts in the Opening Year 2020 Plus Project scenario as anticipated under the mitigation framework (see Table 15 below). The Industrial Alternative would include Mitigation Measure MM-TRA-2 that would reduce impacts TRA-2 to a level less than significant. This is the same TRA-2 as for the Retail Alternative.

| Impact | Mitigation | Significance of Impacts After Mitigation |
|---|---|--|
| Impact TRA-2: Existing Plus Project and Opening Year 2020 Plus Project impact at Caliente Avenue and Airway Road Intersection (AM/PM LOS F) | <p>TRA-2: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the construction of a traffic signal at the intersection of Caliente Avenue and Airway Road, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.</p> <p>It is suggested that protected left-turn phasing be provided on all intersection approaches. To provide the optimal lane configuration with the installation of a traffic signal, the southbound and eastbound intersection approaches should be restriped to provide the following lane geometrics:</p> <ul style="list-style-type: none"> • Southbound: 1 left-turn lane, 2 through lanes, 1 right-turn lane • Eastbound: 2 left-turn lanes, 1 shared through/right-turn lane <p>Note: The partially completed Southview development will be funding 50 percent of the signal installation. The approved Candlelight project was conditioned to install the traffic signal as mitigation for the project's direct impacts at the intersection.</p> | Impacts would be mitigated to a level less than significant. |

Horizon Year 2035 Plus Project Conditions

All intersections in the Horizon Year 2035 Plus Project scenario would operate at acceptable levels with the exception of one intersection. The Industrial would result in significant cumulative impacts to the following intersection that was also impacted under the Retail Alternative:

- TRA-7: Heritage Road and Otay Mesa Road (AM/PM: LOS F)

All roadway segments in the Horizon Year 2035 Plus Project scenario would operate at LOS D or better with the exception of four roadway segments:

- TRA-8: Airway Road between Britannia Boulevard and La Media Road (LOS F)
- TRA-9: Airway Road between La Media Road and Avenida Costa Azul (LOS F)
- TRA-10: Airway Road between Piper Ranch Road and Harvest Road (LOS F)
- TRA-11: Heritage Road between Otay Mesa Road and Datsun Street (LOS F)

However, the addition of Industrial Alternative traffic to Horizon Year 2035 traffic volumes would result in an increase in v/c ratio that is less than the City's significance thresholds for roadway segment operations (0.02 for LOS E and 0.01 for LOS F). Therefore, the Industrial Alternative's impact on the above-listed roadway segments would be less than significant and no mitigation measures would be required under Horizon Year 2035 conditions.

All freeway segments in the Horizon Year 2035 Plus Project scenario would operate at LOS D or better. Similarly, all metered freeway on-ramps in the Horizon Year 2035 Plus Project would operate at acceptable levels.

Consistent with the OMCPU Final PEIR, the Industrial Alternative would include mitigation measures for impacts in the Horizon Year 2035 Plus Project scenario as anticipated under the mitigation framework (see Table 16 below). The Industrial Alternative would include Mitigation Measure TRA-7 (see Section VI, MMRP, below) that would reduce impact TRA- 7 to a level less than significant. This is the same TRA-7 as for the retail project, except the Industrial Alternative's fair share contribution would be 1.0 percent (instead of 5.5 percent).

| Impact | Mitigation | Significance of Impacts After Mitigation |
|---|--|--|
| Impact TRA-7: Horizon Year 2035 Plus Project impact at Heritage Road and Otay Mesa Road Intersection (AM/PM: LOS F) | <p>TRA-7: Prior to the issuance of any building permit, the Owner/Permittee shall pay 1.0 percent fair share of funding needed to construct the following intersection improvements to be completed in conjunction with PFFP Projects OM T-16.5 and OM T-16.6, satisfactory to the City Engineer:</p> <ul style="list-style-type: none"> • Northbound: Widen to Construct second through lane and 1 right-turn lane • Southbound: widen to Construct second left-turn lane and restripe to convert 1 right-turn lane to a second through lane • Eastbound: No changes • Westbound: Modify signal to install right-turn overlap | Impacts would be mitigated to a level less than significant. |

As shown in Tables 15 and 16 above, the Industrial Alternative would implement mitigation measures MM-TRA-2 and MM-TRA-7 presented in Section VI, MMRP to reduce impacts related to transportation/circulation to a level less than significant. These are the same as the mitigation measures required for the Retail Alternative (except for the fair share percentage for TRA-7), and the

Industrial Alternative would not require the nine other mitigation measures that are required for the Retail Alternative.

Alternative Transportation

The Industrial Alternative would also provide new non-contiguous sidewalks along Avenida Costa Azul, Otay Mesa Road, and La Media Road that would provide pedestrian access to the project site. The Industrial Alternative's frontage improvements along northbound La Media Road would also include a Class II buffered bike lane and a Class II buffered bike lane with the frontage improvements along eastbound Otay Mesa Road. The Industrial Alternative would not impact any of the existing bus stops near the project site. Therefore, the Industrial Alternative would not impact transit service.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR occur.

Public Services

OMCPU Final Program EIR

Section 5.13 of the OMCPU Final PEIR provides an analysis of public service impacts associated with the OMCPU. The OMCPU would increase demand for fire protection services and would contribute to the need for new or altered facilities. The OMCPU anticipated construction of a planned 10,500 sf fire station (Fire Station No. 49) in addition to a 10,500 sf 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 OMCPU area. The construction of new facilities would take place within the development footprint of the OMCPU 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 OMCPU would result in additional demand for police service in Beat 713. The San Diego Police Department currently utilizes a five-level priority calls dispatch system, which includes Priority E (Emergency), One, Two, Three and Four. As stated in the OMCPU Final PEIR, the average response times for Beat 713 exceed both the citywide average and police department goals for all calls, except Priority Four. Police response times would continue to increase with the buildout of the OMCPU and the increase of traffic generated by new growth, requiring construction of new facilities. A 10,000 sf collocated police/fire-rescue facility is contemplated by the PFFP for the OMCPU. The construction of this facility would be within the development footprint of the OMCPU 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 OMCPU 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 OMCPU buildout. As discussed in the OMCPU Final PEIR, the construction of these facilities would take place within the development footprint of the OMCPU and would 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 OMCPU 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 Public Facilities Financing Plan (PFFP) for the OMCPU; 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 OMCPU 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 OMCPU 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 OMCPU area upon buildout. The OMCPU Final PEIR stated that the construction of a new facility was specifically contemplated by the current PFFP for the OMCPU, 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 OMCPU 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 OMCPU area would be less than significant.

Retail Alternative

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 fire protection 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 fire protection within the service area. Although, the Retail Alternative could result in increases in service calls due to development of a vacant site, no new facilities or improvements to existing fire protection facilities would be required as a result of the Retail Alternative due to its consistency with future development projections for the OMCPU. Furthermore, Development Impact Fees would be paid prior to building permit issuance, which would be used to maintain as well as fund future fire protection facilities. Therefore, no new or expanded facilities would be required as a result of the Retail Alternative. Impacts would be less than significant.

The Retail Alternative would develop commercial uses consistent with the land use and zoning designations identified in the OMCPU. Therefore, the Retail Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for police protection within the service area. Although the Retail Alternative could result in increases in service calls, no new facilities or improvements to existing facilities would be required as a result of the Retail Alternative due to its consistency with future development projections for the OMCPU. Moreover, ongoing funding for police services is provided by the City General Fund, and

Development Inspection Fees would be paid prior to building permit issuance, which would be used to maintain as well as fund future facilities. Therefore, no new or expanded facilities would be required as a result of the Retail Alternative, and impacts would be less than significant.

The Retail Alternative is limited to commercial development and would not construct any housing that could result in an increase in population beyond that anticipated by the OMCPU. 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 school services, park and recreation facilities, libraries, and other public services that were analyzed in the OMCPU Final PEIR. Therefore, the Retail Alternative would not result in development beyond that anticipated under the OMCPU and would not require construction of additional infrastructure that could induce growth. Therefore, the Retail Alternative 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 Retail Alternative would require a major change to the OMCPU Final PEIR. The Retail Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. This alternative would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Consequently, the Industrial Alternative would be consistent with growth projections that were utilized to forecast demand for future fire and police protection that were analyzed in the OMCPU Final PEIR. Therefore, the Industrial Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for fire protection or police services. The Industrial Alternative is limited to industrial development and would not construct any housing that could result in population growth that could increase demand for school services, park and recreation facilities, libraries, or other public services.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Public Utilities

OMCPU Final Program EIR

Section 5.14 of the OMCPU Final PEIR evaluated potential impacts on utility services that may occur through development of the OMCPU. 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 OMCPU 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 OMCPU 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 OMCPU. All such facilities would be constructed in conjunction with future development projects implemented in accordance with the OMCPU, 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 OMCPU 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 OMCPU would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way.

Retail Alternative

Water

As described in the evaluation of Water Supply below, the Retail Alternative would develop commercial uses consistent with the land use and zoning designations identified in the OMCPU. Therefore, the Retail Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for water supply necessitating construction of new water supply facilities. As described in Section I Summary of Proposed Project above, the Retail Alternative would also install underground connections to existing water supply lines near the project site. These underground connections would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, water supply connections would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant.

Wastewater

A site-specific Preliminary Sewer Study was prepared for the Retail Alternative by Kettler Leweck Engineering (2019). An existing 21-inch sewer VCP traverses Otay Mesa Road, and existing 8-inch and 30-inch VCP sewer pipes traverses La Media Road. The Retail Alternative would construct private 6-inch, 8-inch and 10-inch PVC sewer mains (sizes to be confirmed during final engineering) and 4-inch and 6-inch private sewer laterals. The private mains are proposed in the main private drive aisles that generally traverse the site in the east-west direction, as well as one north-south reach within the right-of-way of La Media Road. The private sewer reach within La Media Road would connect to the existing public 30-inch VCP sewer. The proposed private sewer laterals would collect and convey sewer from the various proposed buildings to the proposed private sewer mains. The Preliminary Sewer Study determined that proposed private sewer system would comply with City requirements.

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 Retail Alternative by RECON (RECON 2017b). The WMP evaluated solid waste impacts associated with four project phases: demolition, grading, construction, and occupancy (post-construction). The WMP determined that the Retail Alternative would require demolition of existing asphalt pavement, berms, spillways, concrete sidewalks, medians, driveways, and curb and gutters within the project site and off-site improvement areas that would generate 700.2 tons of waste that would be fully diverted. Grading for the Retail Alternative would result in a net import 175,000 cy of soil, and therefore would not require disposal of soil. Any vegetation removed during the grading phase would be taken to the Otay Landfill facility for 100 percent diversion. Construction of the Retail Alternative would generate 255.8 tons of waste. 192 tons of this waste would be diverted, leaving 64 tons that would require disposal at a landfill.

Table 17 summarizes the amount of waste estimated to be generated and diverted during the demolition, grading, and construction phases of the Retail Alternative (RECON 2017b). Of the 956.0 tons estimated to be produced, 892.2 tons would be diverted during the demolition and construction phases, primarily through source separation. This would result in 93 percent of waste material diverted from the landfill for reuse.

| Phase | Tons Generated | Tons Diverted | Tons Disposed |
|--------------|----------------|--------------------|------------------|
| Demolition | 700.2 | 700.2 | -- |
| Grading | 0 | -- | -- |
| Construction | 255.8 | 192.0 (75%) | 64.0 (25%) |
| Total | 956.0 | 892.2 (93%) | 64.0 (7%) |

Source: RECON 2017b

The WMP determined that operation of the Retail Alternative would generate 737.3 tons of waste per year. Compliance with the City's Recycling Ordinance is expected to provide a minimum recycling service volume of 40 percent for large complexes. Therefore, waste anticipated to be diverted during the occupancy phase would be approximately 294.2 tons per year. The remaining 443.1 tons per year would exceed the 60.0 ton-per-year threshold of significance of the mitigation framework of the OMCPU EIR. To mitigate for the cumulative impact on solid waste, the applicant would be required to implement the ongoing measures detailed in the WMP to ensure that waste is minimized, operation complies with City ordinances, and achieve maximum diversion from landfills. Compliance with the measures identified in the WMP would reduce solid waste impacts to a level less than significant.

Stormwater Infrastructure

As discussed under the hydrology and water quality section above, the Retail Alternative would maintain the overall existing condition on-site drainage patterns. The majority of on-site and tributary off-site runoff would continue to be conveyed to the Caltrans culverts along the westerly project boundary. Project runoff would enter the Caltrans culverts through the existing storm drain near the southwest corner of the site. The Retail Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain. The Drainage Report documented that Retail Alternative would reduce flow rates under the 5-, 10-, 25-, 50-, and 100-Year storm events as follows:

- Reduce the 5-Year flow rate from 39 cubic feet per second (cfs) in the existing condition to 29 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 47 cfs in the existing condition to 34 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 52 cfs in the existing condition to 37 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 61 cfs in the existing condition to 43 cfs in the post-project condition.
- Reduce the 100-Year flow rate from 66 cfs in the existing condition to 45 cfs in the post-project condition (Chang Consultants 2019a).

Therefore, the Retail Alternative would not require the construction of off-site stormwater infrastructure facilities. The Retail Alternative would implement ten biofiltration basins as pollutant and flow control BMPs at various locations throughout the site. The proposed biofiltration basins would also provide detention for hydromodification requirements and would accommodate the additional runoff generated in the post-project condition. BMPs 1, 2, and 6 would include flood

storage easements to detain runoff during the 100-year storm events. Each biofiltration basin would be sized for the impervious and pervious area within its tributary drainage area and would be designed consistent current pollutant control and flow control requirements per the City's 2018 Storm Water Standards. The proposed site-specific stormwater facilities would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, stormwater infrastructure would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant. As described in the discussion of biological resources above, there are no jurisdictional drainages or wetlands on site. Therefore, the Retail Alternative would not require permits from the RWQCB or ACOE under federal CWA section 401 or 404.

Communications Systems

The project site is located in an urbanized area of the City with existing communication services. 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 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. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative.

Water

As described in the evaluation of Water Supply below, the Industrial Alternative would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Therefore, the Industrial Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for water supply necessitating construction of new water supply facilities. As described in Section I Summary of Proposed Project above, the Industrial Alternative would install underground connections to existing water supply lines near the project site. These underground connections would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, water supply connections would not result in any environmental impacts that have not been evaluated in this EIR Addendum. Impacts would be less than significant.

Wastewater

A site-specific Sewer Study prepared for the Industrial Alternative (Kimley-Horn 2020c) documented that the proposed building that would be located on the western half of the project site would be served by a gravity system that would connect to the public sewer main located in Otay Mesa Road.

The proposed building that would be located on the eastern half of the project site would be served by a gravity system that would connect to the proposed private sewer main that would be constructed within the proposed 4-lane private driveway along the eastern boundary (shown as Landmark Road on Figure 5 Industrial Alternative Site Plan), where it would combine flows with the adjacent property to the east. The sewer study estimated that the Industrial Alternative would yield 12 Equivalent Dwelling Units at full buildout, which is less than the allowable sewer generation for industrially-zoned land, but in-line with expected sewer demand of similar projects. The Industrial Alternative flows to City sewer pump station 23T, which has available capacity for the Industrial Alternative. The Industrial Alternative would pay its fair share and sewer surcharge fees at the time of building permit issuance. Furthermore, the Sewer Study for the Industrial Alternative determined that design of the proposed sewer system is consistent with the design parameters as outlined in the City of San Diego–Sewer Design Guide, May 2015.

Reclaimed Water

The Industrial Alternative would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Consequently, the Industrial 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 Industrial 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

An Addendum to the Waste Management Plan for the La Media Retail Project was prepared by RECON (2020b), which determined that the Industrial Alternative would require demolition of the same amount of existing asphalt pavement, berms, spillways, concrete sidewalks, medians, driveways, and curb and gutters within the project site and off-site improvement areas as the Retail Alternative, generating 700.2 tons of waste that would be fully diverted. Grading for the Industrial Alternative would result in a net import 183,440 cubic yards of soil, and therefore would not require disposal of soil during this phase. Any vegetation removed during the grading phase would be taken to the Otay Landfill facility for 100 percent diversion. Construction of the Industrial Alternative would generate 501.46 tons of waste, 376 tons of which would be diverted, leaving 126 tons that would require disposal at a landfill.

Table 18 summarizes the total amount of waste estimated to be generated, diverted, and disposed by each of the above phases of the Industrial Alternative (RECON 2020b). Of the 1,201.2 tons estimated to be produced, 1,076.2 tons would be diverted during the demolition and construction phases, primarily through source separation. This would result in 87 percent of waste material diverted from the landfill for reuse. This is larger than the Retail Alternative's total of 64.0 tons, but it would still be consistent with the City's requirement to divert 75 percent of construction debris to landfills. Therefore, the Industrial Alternative would not result in any new significant impacts related to construction waste that were not identified in the WMP prepared for the Retail Alternative.

| Phase | Tons Generated | Tons Diverted | Tons Disposed |
|----------------------|----------------|----------------------|--------------------|
| Demolition | 700.2 | 700.2 | -- |
| Grading | 0 | -- | -- |
| Construction | 501.0 | 376.0 (75%) | 126.0 (25%) |
| Total | 1,201.2 | 1,076.2 (87%) | 126.0 (13%) |
| Source: RECON 2020b. | | | |

The Addendum to the Waste Management Plan for the La Media Retail Project (RECON 2020b) determined that operation of the Industrial Alternative would generate 1,517.2 tons of waste per year. Compliance with the City's Recycling Ordinance is expected to provide a minimum recycling service volume of 40 percent. Therefore, waste anticipated to be diverted during the occupancy phase would be approximately 606.9 tons per year. The remaining 910.3 tons per year would exceed the 60.0 ton-per-year threshold of significance. To mitigate for the cumulative impact on solid waste, the applicant shall be responsible for implementing the long-term waste management program measures identified in the WMP prepared for the Industrial Alternative. This program shall include recyclables collection services required by and in accordance with the Recycling Ordinance, as well as providing exterior storage space for refuse, recyclable materials, and a means of handling landscaping and green waste materials. Drought tolerant plants would be used to reduce the amount of green waste produced. Collection of organic waste and its disposal at recycling centers that accept organic waste would further reduce the waste generated by the Industrial Alternative during occupancy. An ongoing WMP would include a means for handling landscaping and other organic waste materials. Therefore, the Industrial Alternative would not result in any new significant solid waste impacts that were not identified in the WMP for the Retail Alternative.

Stormwater Infrastructure

As discussed under the hydrology and water quality section above, the site-specific Addendum to the Drainage Report (Kimley-Horn 2020a) determined that the Industrial Alternative would maintain the overall existing condition on-site drainage patterns. The majority of on-site and tributary off-site runoff would continue to be conveyed to the Caltrans culverts along the westerly project boundary. Project runoff would enter the Caltrans culverts through the existing storm drain near the southwest corner of the site. The Industrial Alternative would also introduce a public storm drain system along Otay Mesa Road that would collect the remainder of the runoff for transfer to the existing Caltrans stormwater facility within Otay Mesa Road. Additionally, the Caltrans stormwater easement located in the northwest corner of the project site would remain. The Addendum to the Drainage Report documented that the Industrial Alternative would reduce flow rates under the 5-, 10-, 25-, 50-, and 100-Year storm events as follows:

- Reduce the 5-Year flow rate from 39.0 cubic feet cfs in the existing condition to 13.2 cfs in the post-project condition.
- Reduce the 10-Year flow rate from 47.0 cfs in the existing condition to 15.1 cfs in the post-project condition.
- Reduce the 25-Year flow rate from 52.0 cfs in the existing condition to 16.9 cfs in the post-project condition.
- Reduce the 50-Year flow rate from 61.0 cfs in the existing condition to 19.6 cfs in the post-project condition.

- Reduce the 100-Year flow rate from 66.0 cfs in the existing condition to 21.3 cfs in the post-project condition (Kimley-Horn 2020a).

Therefore, the Industrial Alternative would not require the construction of off-site stormwater infrastructure facilities. The Industrial Alternative would install one biofiltration basin along the southern boundary of the project site, a second biofiltration basin in the southeastern corner of the project site, and vegetated swales with trees along the western and northern project site boundaries. The proposed biofiltration basins would also provide detention for hydromodification requirements and would accommodate the additional runoff generated in the post-project condition. BMPs 1 and 2 would include flood storage easements to detain runoff during the 100-year storm events. The proposed site-specific stormwater facilities would be located within the project footprint evaluated throughout this EIR Addendum. Therefore, stormwater infrastructure would not result in any environmental impacts that have not been evaluated in this EIR Addendum, and impacts would be less than significant. As described in the discussion of biological resources above, there are no jurisdictional drainages or wetlands on site. Therefore, the Industrial Alternative would not require permits from the RWQCB or ACOE under federal CWA section 401 or 404, respectively.

Communications Systems

The project site is located in an urbanized area of the City with existing communication services. The Industrial Alternative would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Consequently, the Industrial Alternative 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. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Water Supply

OMCPU Final Program EIR

Section 5.15 of the OMCPU Final PEIR provides an analysis of water supply impacts associated with the OMCPU. The OMCPU Final PEIR determined that impacts associated with water supply would be less than significant. The Water Supply Assessment (WSA) was prepared by the City PUD for the OMCPU Final PEIR concluded that there is sufficient water supply to serve existing demands, Retail Alternative demands of the OMCPU, 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 OMCPU 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 CPU policies regarding the use of drought-tolerant plantings for Retail Alternative landscape plans. The OMCPU

Final PEIR concluded that adherence to these requirements would prevent excessive water usage for irrigation and other purposes. Impacts would be less than significant.

Retail Alternative

The Retail Alternative did not meet the City's CEQA threshold of shopping centers or businesses employing more than 1,000 people or having more than 500,000 sf of floor space that would require preparation of a WSA. However, 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 OMCPU, 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. The WSA prepared for the OMCPU Final PEIR assessed water supply demands within the City PUD service area based on ultimate buildout of 9,255 multi-family units and 13,758 employees. Based on the water supply unit rate utilized in the 2013 WSA, multi-family development would use 80 gallons per day (gpd) per person, while commercial development would utilize 1,785 gpd per acre or 60 gpd per employee. As discussed in the OMCPU Final PEIR, the projected water demand of the OMCPU 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 OMCPU 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 Retail Alternative would develop commercial uses consistent with the land use and zoning designations identified in the OMCPU. Therefore, the Retail Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for water supply. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be similar to those identified for the Retail Alternative. The Industrial Alternative 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 sf of floor space that would require preparation of a WSA. This alternative would develop industrial uses consistent with the land use and zoning designations identified in the OMCPU. Therefore, the Industrial Alternative would not result in development beyond that anticipated under the OMCPU and would not increase the demand for water supply.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Population and Housing

OMCPU Final Program EIR

Section 5.16 of the OMCPU Final PEIR provides an analysis of population and housing impacts associated with the OMCPU. The OMCPU Final PEIR determined that impacts associated with population growth would be less than significant, as the OMCPU 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 OMCPU 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 OMCPU are intended to foster the development of housing for all income levels. As such, the OMCPU 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.

Retail Alternative

The Retail Alternative is limited to commercial development and would not construct any housing. The Retail Alternative is consistent with the land use and zoning designations identified in the OMCPU, and therefore would not require construction of additional infrastructure that could induce growth. Therefore, no impact would occur.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final PEIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR. Therefore, no impact would occur.

Industrial Alternative

The Industrial Alternative is limited to industrial development and would not construct any housing. The Industrial Alternative is consistent with the land use and zoning designations identified in the OMCPU, and therefore would not require construction of additional infrastructure that could induce growth. Therefore, no impact would occur.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

Agricultural and Mineral Resources

OMCPU Final Program EIR

Section 5.17 of the OMCPU Final PEIR provides an analysis of agricultural and mineral resource impacts associated with the OMCPU. 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 OMCPU 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 OMCPU 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 OMCPU area is intended as an interim, rather than permanent use. The OMCPU 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 OMCPU 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 significant. As such, the ability to extract mineral resources would not be impacted with the adoption of the OMCPU.

Retail Alternative

The project site is designated as Farmland of Local Importance, as shown on Figure 5.17-1 of the OMCPU Final PEIR. However, the project site is not an active agricultural use, and the site is surrounded by BMA to the northwest and commercial and industrial development to the north, west, and southeast. Although vacant land to the south and east are also designated as Farmland of Local Importance, these parcels are not currently in active agricultural use. Furthermore, the project site is not designated or zoned for agricultural production. Therefore, the Retail Alternative does not propose the conversion of agricultural land to non-agricultural uses. Impacts would be less than significant.

The project site is designated as MRZ-3, as shown on Figure 5.17-3 of the OMCPU Final PEIR. Land designated as MRZ-3 is not considered a significant mineral resource pursuant to the PEIR. Therefore, the Retail Alternative would not result in the loss of availability or prevention of future extraction of sand or gravel, and/or mineral resources. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new

significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

Impacts associated with the Industrial Alternative would be identical to those identified for the Retail Alternative. This alternative would utilize the same development footprint as the commercial retail project and would have the same level of impact related to Agricultural and Mineral Resources.

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR occur.

Greenhouse Gas Emissions

OMCPU Final Program EIR

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.

It should be noted that since preparation of the OMCPU Final PEIR, the California Supreme Court found that using the 28.3 percent statewide emission reduction goal did not adequately show a project's consistency with the Climate Change Scoping Plan.

Retail Alternative

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.

A CAP Consistency Checklist for the Retail Alternative was prepared by Smith Consulting Architects (2019). 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 amendment 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. The Retail Alternative's consistency with the CAP Consistency Checklist is presented below.

Under Step 1 of the CAP Consistency Checklist (Land Use Consistency), the Retail Alternative would be consistent with the existing General Plan and Community Plan Heavy Commercial land use designation and the existing IL-3-1 (Industrial-Light) zoning designation. Therefore, the Retail

Alternative would be consistent with the growth projections used in the development of the CAP per Step 1(A).

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

- Utilizing roofing materials, plumbing fixtures and fittings, and appliances and fittings consistent with the requirements specified in the California Green Building Standards Code for non-residential buildings.
- Introducing 57 electrical vehicle parking spaces, 29 of which would be provided with charging equipment installed ready for use.
- Designating 71 parking spaces for low-emitting, fuel efficient and carpool/vanpool spaces.
- Introducing 42 short-term bicycle parking spaces and 40 long-term bicycle parking spaces.
- Providing three shower stalls, each of which would include two 2-tiered lockers (Smith Consulting Architects 2019).

These project features would be assured as a condition of project approval. Thus, the Retail Alternative is consistent with the CAP.

The Retail Alternative's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable based on the Retail Alternative's consistency with the City's CAP Consistency Checklist. Therefore, the Retail Alternative's direct and cumulative GHG emissions would have a less than significant impact on the environment.

Based on the foregoing analysis and information, there is no evidence that the Retail Alternative would require a major change to the OMCPU Final EIR. The Retail Alternative would not result in any new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final EIR.

Industrial Alternative

A CAP Consistency Checklist for the Industrial Alternative was prepared by Atlantis Group (2020). Impacts associated with the Industrial Alternative would be similar to or less than those identified for the Retail Alternative. Traffic modeling completed for the Industrial Alternative in the TIA determined that it would generate 2,054 ADT, which would be 6,606 ADT less than the cumulative ADT of 8,660 projected for the Retail Alternative (RICK Engineering 2021). Therefore, the Industrial Alternative would generate less GHG emissions than the Retail Alternative. The Industrial Alternative's consistency with the CAP Consistency Checklist is presented below.

Under Step 1 of the CAP Consistency Checklist (Land Use Consistency), the Industrial Alternative would be consistent with the existing General Plan and Community Plan Heavy Commercial land use designation and IL-3-1 (Industrial-Light) zoning designation. Therefore, the Industrial Alternative would be consistent with the growth projections used in the development of the CAP per Step 1(A). The Industrial Alternative would meet the Step 2 CAP requirements by implementing the following design features:

- Utilizing roofing materials, plumbing fixtures and fittings, and appliances and fittings consistent with the requirements specified in the California Green Building Standards Code for non-residential buildings.
- Introducing 18 electrical vehicle parking spaces, 9 of which would be provided with charging equipment installed ready for use.
- Designating 26 parking spaces for low-emitting, fuel efficient and carpool/vanpool spaces.
- Introducing 15 long-term bicycle parking spaces (the industrial uses are exempt from short-term bicycle parking spaces).
- Providing one shower stall in each building, each of which would include two 2-tiered lockers (Atlantis Group 2020).

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

Based on the foregoing analysis and information, there is no evidence that the Industrial Alternative would require a major change to the OMCPU Final PEIR. The Industrial Alternative would not result in a new significant impact or a substantial increase in the severity of impacts from that described in the OMCPU Final PEIR.

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

The project shall be required to comply with the applicable mitigation framework outlined within the 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 (PRECON) 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,
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 No. 334235 and/or Environmental Document No. 334235, 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.

3. **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:

California Department Fish and Wildlife
U.S. Fish and Wildlife Service

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 |
| 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: BIOLOGICAL RESOURCE PROTECTION DURING CONSTRUCTION

I. Prior to Construction

- A. **Biologist Verification** - The owner/permittee shall provide a letter to the City’s MMC section stating that a Project Biologist (Qualified Biologist) as defined in the City’s Biological Guidelines, 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,

MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts (ESAs); and/or other local, state, or federal requirements.

- D. **BCME** - 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 U.S. Fish and Wildlife Service 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 western burrowing owl and any species identified as a listed, candidate, sensitive, or special status species in the MSCP, 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 nesting birds 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 applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting burrowing owl, sensitive, or MSCP covered birds are detected, a letter report or mitigation plan 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 birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan 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 or mitigation plan 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 and fauna species, including nesting birds) 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 (explain the avian 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 (CSV). The CSV 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, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction 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, 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-2: UPLAND VEGETATION COMMUNITIES

Prior to the issuance of a Notice to Proceed for the subdivision, or any construction permits, such as demolition, grading, or building, or beginning any construction-related activity on-site, Mitigation for loss of 17.6 acres of Non-native Grassland (Tier IIIB) shall be satisfied pursuant to the ratios outlined in Tables 19a and 19b.

| Table 19a Mitigation Requirements for Impacts to Sensitive Upland Vegetation Communities with Location of Preservation Inside MHPA (acres) | | | | | |
|--|-----------|--|-------------------------------|--------------------|------------------------|
| Vegetation Community | MSCP Tier | Existing Acreage (On-site Survey Area) | Impact Outside MHPA (On-site) | Mitigation Ratio** | Mitigation Requirement |
| Non-Native Grassland* | III-B | 17.6 | 17.6 | 0.5:1 | 8.8 |
| TOTAL | | 17.6 | 17.6 [^] | | 8.8 |
| * Includes disturbed non-native grassland; **where mitigation occurs in MHPA. [^] Total does not include impacts to 2.3 acres comprised of disturbed land and urban/developed land Source: RECON 2021b | | | | | |

| Table 19b Mitigation Requirements for Impacts to Sensitive Upland Vegetation Communities with Location of Preservation Outside MHPA (acres) | | | | | |
|---|-----------|------------------|---------------------|--------------------|------------------------|
| Vegetation Community | MSCP Tier | Existing Acreage | Impact Outside MHPA | Mitigation Ratio** | Mitigation Requirement |
| Non-Native Grassland* | III-B | 17.6 | 17.6 | 1:1 | 17.6 |
| TOTAL | | 17.6 | 17.6^ | | 17.6 |
| * Includes disturbed non-native grassland; **where mitigation occurs outside of MHPA. ^ Total does not include impacts to 2.3 acres comprised of disturbed land and urban/developed land Source: RECON 2021b | | | | | |

MM-BIO-3: BURROWING OWL

Mitigation Option-1: Conservation of Land Option and Mitigation Bank Credit Allocation

Upon approval of the SDP, the applicant would establish an escrow account with \$1,350,000 (equivalent to 18 acres at \$75,000/acre for Ramona Grassland Conservation Bank credits or towards the acquisition of land in Otay Mesa); however, should the City be unsuccessful in acquiring sufficient land to include the project, on or before June 30, 2021, the City shall direct the applicant to withdraw the funds for the purchase of land identified by the City or purchase of Grassland Credits at the Ramona Grassland Conservation Bank or Lonestar Mitigation Bank.

Prior to the issuance of a NTP for the subdivision, or any construction permits, such as demolition, grading, or building, or beginning any construction-related activity on-site, the applicant shall provide the location of mitigation lands and begin restoration/enhancement activities in accordance with a Habitat Management Plan on these lands prior to project implementation to the satisfaction of EAS, MSCP, and the Wildlife Agencies for impacts to burrowing owl habitat consistent with the ratios stated in Tables 19a and 19b.

- A Habitat Management Plan shall be prepared outlining initial tasks to include as BUOW restoration/enhancement activities and on-going maintenance unless otherwise agreed to by the City's Park and Recreation Department Open Space Division.
- Dedication of the mitigation properties to the City of San Diego in Fee title via MSCP Grant Deed shall be recorded with the County Recorder upon Park and Recreation Open Space Division acceptance of the land.
- Remainder acreage not secured upon acquisition of conservation land would be satisfied through the purchase of mitigation credits at the Ramona Conservation Bank or the Lonestar Mitigation Bank (located inside City of San Diego jurisdiction) as outlined in Option 2.

Mitigation Option 2 – Mitigation Bank Credits – Western Burrowing Owl Mitigation

- (1) Prior to the issuance of a NTP for the subdivision, or any construction permits, such as demolition, grading or building, or beginning any construction-related activity on-site, to the maximum extent practicable, the applicant shall provide documentation that mitigation for burrowing owl, that mitigates for the loss of 17.6 acres of on-site suitable occupied burrowing owl habitat, will be achieved through the purchase of a minimum 17.6 acres of credits of suitable occupied burrowing owl habitat from an approved mitigation bank. The

mitigation bank must be located within the City of San Diego limits and either within or adjacent to the MHPA (e.g., Lonestar Mitigation Bank). If mitigation bank lands occur outside of the MHPA, then mitigation required would a total a minimum of 17.6 acres. Under this Option, the project proponent proposes to purchase 17.6 acres of non-native grassland occupied by burrowing owl as mitigation credits from the Ramona Grassland Conservation Bank or 8.8 acres of non-native grassland occupied by burrowing owl as mitigation credits from the Lonestar Mitigation Bank (located inside the City's jurisdiction and inside the MHPA subject to 0.5:1 mitigation ratio).

Required Documentation

- a. A copy of the executed purchase or option contract referencing the project name and numbers for which the habitat credits will be purchased.
 - b. If not stated explicitly in the purchase or option contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.
 - c. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
 - d. An accounting of the status of the mitigation bank must be provided that shall include the total amount of credits available at the bank, the amount required by this project, and the amount remaining after utilization by this project.
 - e. That the mitigation bank has the appropriate number and resource type of credits available.
- (2) The mitigation bank credits to be purchased must be occupied by burrowing owl and support fossorial mammals. A conservation easement for the protection of burrowing owl/habitat shall be in place over the mitigation bank land.
- (3) Documentation that the mitigation bank lands purchased are under a Long-term Mitigation Land Management Plan for the on-going maintenance and monitoring shall be provided to the City and Wildlife Agencies. The management plan must be completed prior to the issuance of a grading permit and shall identify the long-term funding mechanism (e.g., an endowment) for the maintenance of the mitigation bank lands for burrowing owl.

Financial Assurance For Mitigation

- (1) Prior to the issuance of a NTP for the subdivision, or any construction permits, such as demolition, grading, or building, or beginning any construction-related activity on-site, surety or performance bonds, letters of credit, investment grade corporate guarantees, set aside letters from a federally insured lending institution or other security acceptable to EAS, MSCP, and the Wildlife Agencies ("Financial Assurances") shall be provided by the applicant to the City in sufficient amounts guaranteeing the implementation of either Mitigation Option 1 or Mitigation Option 2 prior to grading permit issuance and provide proof thereof to EAS, MSCP, and the Wildlife Agencies.
- (2) Within thirty (30) days after implementation of Mitigation Option 2, the City shall release the Financial Assurances.

Western Burrowing Owl Preconstruction Survey Requirements

Prior to Permit or Notice to Proceed Issuance:

1. As this project has been determined to be burrowing owl-occupied or to have burrowing owl occupation potential, the Applicant Department or Permit Holder shall submit evidence to the ADD of Entitlements and MSCP staff verifying that a Biologist possessing qualifications pursuant "Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Wildlife, March 7, 2012 (hereafter referred as CDFW 2012, Staff Report), has been retained to implement a burrowing owl construction impact avoidance program.
2. The qualified burrowing owl biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City's burrowing owl requirements and subsequent survey schedule.

Prior to Start of Construction:

1. The Applicant Department or Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the project site; regardless of the time of the year. "Site" means the project site and the area within a radius of 450 feet of the project site. The report shall be submitted and approved by the Wildlife Agencies and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and burrowing owl locations on aerial photos.
2. The pre-construction survey shall follow the methods described in CDFW 2012, Staff Report - Appendix D
3. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of preconstruction/take avoidance surveys. Verification shall be provided to the City's MMC and MSCP Sections. If results of the preconstruction surveys have changed and burrowing owl are present in areas not previously identified, immediate notification to the City and Wildlife Agencies shall be provided prior to ground disturbing activities.

During Construction:

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

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

A. Post Survey Follow Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are Not Detected During the Initial Pre-Construction Survey -

Monitoring the site for new burrows is required using CDFW Staff Report 2012 Appendix D methods for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete (*NOTE - Using a projected completion date (that is amended if needed) will allow development of a monitoring schedule*).

- 1) If no active burrows are found but burrowing owl are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.
- 2) If no active burrows are found but burrowing owl are observed during follow up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's MMC and MSCP Sections shall be notified and any portion of the site where owls have been sites and that has not been graded or otherwise disturbed shall be avoided until further notice.
- 3) If a burrowing owl begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section B must be followed.
- 4) Any actions other than these require the approval of the City and the Wildlife Agencies.

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

- 1) This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – **all direct and indirect impacts to burrowing owl within the MHPA SHALL be avoided.**
- 2) If one or more burrowing owl are using any burrows (including pipes, culverts, debris piles, etc.) on or within 300 feet of the proposed construction area, the City's MMC and MSCP Sections shall be contacted. The City's MSCP and MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist appropriate City biologist for on-going coordination with the Wildlife Agencies and the qualified consulting burrowing owl biologist. No construction shall occur within

300 feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.

- a) **Outside the Breeding Season** - If the burrowing owl is using a burrow on site outside the breeding season (i.e., September 1 – January 31), the BUOW may be evicted after the qualified burrowing owl biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
- b) **During Breeding Season** - If a burrowing owl is using a burrow on-site during the breeding season (February 1-August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the BUOWs can be evicted. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

Survey Reporting During Construction:

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

Post Construction:

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

Historical Resources (ARCHAEOLOGY AND TRIBAL CULTURAL RESOURCES)

MM-HIST-1: ARCHAEOLOGICAL AND NATIVE AMERICAN 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 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 (1/4 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 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.

Transportation/Circulation

Retail Alternative

MM-TRA-1: La Media Road/Otay Mesa Road: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of Otay Mesa Road at La Media Road to construct a second left-turn lane at the westbound approach of the intersection and shall modify the signal to install a right-turn overlap phase on the northbound approach of the intersection, all satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.

MM-TRA-2: Caliente Avenue/Airway Road: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the construction of a traffic signal at the intersection of Caliente Avenue and Airway Road, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.

It is suggested that protected left-turn phasing be provided on all intersection approaches. To provide the optimal lane configuration with the installation of a traffic signal, the southbound and eastbound intersection approaches should be restriped to provide the following lane geometrics:

- Southbound: 1 left-turn lane, 2 through lanes, 1 right-turn lane
- Eastbound: 2 left-turn lanes, 1 shared through/right-turn lane

Note: The partially completed Southview development will be funding 50 percent of the signal installation. The approved Candlelight project was conditioned to install the traffic signal as mitigation for the project's direct impacts at the intersection.

MM-TRA-3: La Media Road between SR-905 EB Ramps and Airway Road: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of La Media Road to construct a second northbound through lane from Airway Road to approximately 600 feet north of Airway Road, to where the road is already widened to 3 through lanes, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy. Construction of a second northbound through lane would upgrade the roadway segment to a four-lane Collector, and the increase in roadway capacity would be sufficient to mitigate the Retail Alternative's significant impact.

MM-TRA-4: Airway Road between La Media Road and Avenida Costa Azul: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the widening of Airway Road to construct a second westbound lane from La Media Road to approximately 900 feet east of La Media Road, to where the road is already widened to two westbound lanes, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.

The second westbound lane would function as a through lane and transition to a right-turn lane at the westbound approach of the La Media Road/Airway Road intersection. Widening Airway Road to

construct a second westbound through lane would upgrade the roadway segment to a three-lane Collector, and the increase in roadway capacity would be sufficient to mitigate the Retail Alternative's significant direct impact.

MM-TRA-5: La Media Road/Otay Mesa Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 20.8 percent fair share of funding needed to construct the following intersection improvements, satisfactory to the City Engineer:

- Southbound: Widen to construct second through lane
- Eastbound: Widen to construct second left-turn lane

MM-TRA-5 is required in addition to the mitigation measure that is required for the La Media Road and Otay Mesa Road Intersection under Opening Year 2020 conditions (TRA-1).

Note: The fair share contribution for TRA-5 only applies once the Owner/Permittee has constructed the second westbound left-turn lane for Mitigation Measure TRA-1.

MM-TRA-6: Britannia Boulevard/Airway Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 2.3 percent fair share of funding needed to construct the following intersection improvements at the intersection of Britannia Blvd and Airway Rd to be completed in conjunction with PFFP Projects OM T-21.2, OM T-21.3, OM T-10.4, and OM T-10.5, satisfactory to the City Engineer:

- Northbound: Widen to Construct 1 right-turn lane
- Southbound: Restripe to provide second left-turn lane and second through lane at intersection approach. Widen to Construct second southbound through lane on south leg for 300 feet south of Airway Road plus transition taper.
- Eastbound: Widen to Construct second left-turn lane and 1 right-turn lane
- Westbound: Modify signal to install right-turn overlap

MM-TRA-7: Heritage Road/Otay Mesa Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 5.5 percent fair share of funding needed to construct the following intersection improvements to be completed in conjunction with PFFP Projects OM T-16.5 and OM T-16.6, satisfactory to the City Engineer:

- Northbound: Widen to Construct second through lane and 1 right-turn lane
- Southbound: widen to Construct second left-turn lane and restripe to convert 1 right-turn lane to a second through lane
- Eastbound: No changes
- Westbound: Modify signal to install right-turn overlap

MM-TRA-8: Airway Road between Britannia Boulevard and La Media Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 5.0 percent fair share of funding needed to complete PFFP Project OM T-10.5, which would widen and improve the segment of Airway Road between Britannia Blvd and La Media Road to a 4-lane Major Arterial, satisfactory to the City Engineer.

MM-TRA-9: Airway Road between La Media Road and Avenida Costa Azul: Prior to the issuance of any building permit, the Owner/Permittee shall pay 7.3 percent fair share of funding needed to

complete PFFP Project OM T-10.6, which would widen and improve the segment to a 4-lane Major Arterial, satisfactory to the City Engineer.

MM-TRA-9 is required in addition to the mitigation measure that is required for the segment of Airway Road between La Media Road and Avenida Costa Azul under Opening Year 2020 conditions (TRA-4).

MM-TRA-10: Airway Road between Piper Ranch Road and Harvest Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 2.4 percent fair share of funding needed to complete PFFP Projects OM T-10.7 and OM T-10.8, which would widen and improve the segment of Airway Road between Piper Ranch Road and Harvest Road to a 4-lane Major Arterial, satisfactory to the City Engineer.

MM-TRA-11: Heritage Road between Otay Mesa Road and Datsun Street: Prior to the issuance of any building permit, the Owner/Permittee shall pay 4.9 percent fair share of funding needed to complete PFFP Project OM T-16.5, which would widen and improve the segment to a 6-lane Prime Arterial, satisfactory to the City Engineer.

Industrial Alternative

The mitigation measures presented below are the same as those required for the Retail Alternative (except for the fair share percentage for MM-TRA-7), and the Industrial Alternative would not require the nine other mitigation measures that are required for the Retail Alternative.

MM-TRA-2: Caliente Avenue/Airway Road: Prior to the issuance of any building permit, the Owner/Permittee shall assure by permit and bond the construction of a traffic signal at the intersection of Caliente Avenue and Airway Road, satisfactory to the City Engineer. All improvements shall be installed and operational prior to first occupancy.

It is suggested that protected left-turn phasing be provided on all intersection approaches. To provide the optimal lane configuration with the installation of a traffic signal, the southbound and eastbound intersection approaches should be restriped to provide the following lane geometrics:

- Southbound: 1 left-turn lane, 2 through lanes, 1 right-turn lane
- Eastbound: 2 left-turn lanes, 1 shared through/right-turn lane

Note: The partially completed Southview development will be funding 50 percent of the signal installation. The approved Candlelight project was conditioned to install the traffic signal as mitigation for the project's direct impacts at the intersection.

MM-TRA-7: Heritage Road/Otay Mesa Road: Prior to the issuance of any building permit, the Owner/Permittee shall pay 1.0 percent fair share of funding needed to construct the following intersection improvements to be completed in conjunction with PFFP Projects OM T-16.5 and OM T-16.6, satisfactory to the City Engineer:

- Northbound: Widen to Construct second through lane and 1 right-turn lane
- Southbound: widen to Construct second left-turn lane and restripe to convert 1 right-turn lane to a second through lane
- Eastbound: No changes

- Westbound: Modify signal to install right-turn overlap

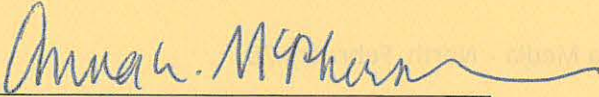
VII. SIGNIFICANT UNMITIGATED IMPACTS

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 OMCPU 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 OMCPU Final PEIR further concluded that significant impacts related to air quality, noise, utilities (solid waste), transportation, 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, traffic/circulation, utilities (solid waste), and greenhouse gas emissions, which would remain significant and unmitigated after implementation of the mitigation framework. Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the 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 Program EIR, 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 Program EIR.

VIII. CERTIFICATION

Copies of the addendum, the OMCPU Final PEIR, the MMRP, and associated project-specific technical appendices may be reviewed by appointment in the office of the Development Services Department or purchased for the cost of reproduction.



Anna L. McPherson, Program Manager, AICP
Development Services Department

May 11, 2021

Date of Final Report

Analyst: R. Benally

Attachments:

- Figure 1: Regional Location
 - Figure 2: Project Location on Aerial Photograph
 - Figure 3: Retail Alternative Site Plan
 - Figure 4: Retail Alternative Proposed Lot Layout
 - Figure 5: Industrial Alternative Site Plan
 - Figure 6: Industrial Alternative Proposed Lot Layout
- Environmental Impact Report No. 30330/304032, SCH No. 2004651076

IX. REFERENCES

Atlantis Group

2020 Climate Action Plan Consistency Checklist for La Media Industrial Alternative.

Chang Consultants

2019a Preliminary Drainage Report for Plaza La Media – North. February 28.

2019b Priority Development Project Storm Water Quality Management Plan, Plaza La Media – North. February 28.

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GEOCON, Inc.

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Jones Sign

2017 Plaza La Media Sign Program. September 18.

Kettler Leweck Engineering (KWE)

2019 Preliminary Sewer Study for Plaza La Media. March 19.

Kimley-Horn and Associates, Inc. (Kimley-Horn)

2020a Drainage Addendum for Preliminary Drainage Report for Plaza La Media North. March 20.

2020b SWQMP Addendum for PDP SWQMP Plaza La Media North. March 26.

2020c Sewer Study Plaza La Media North – Industrial Alternative. July.

RECON Environmental, Inc. (RECON)

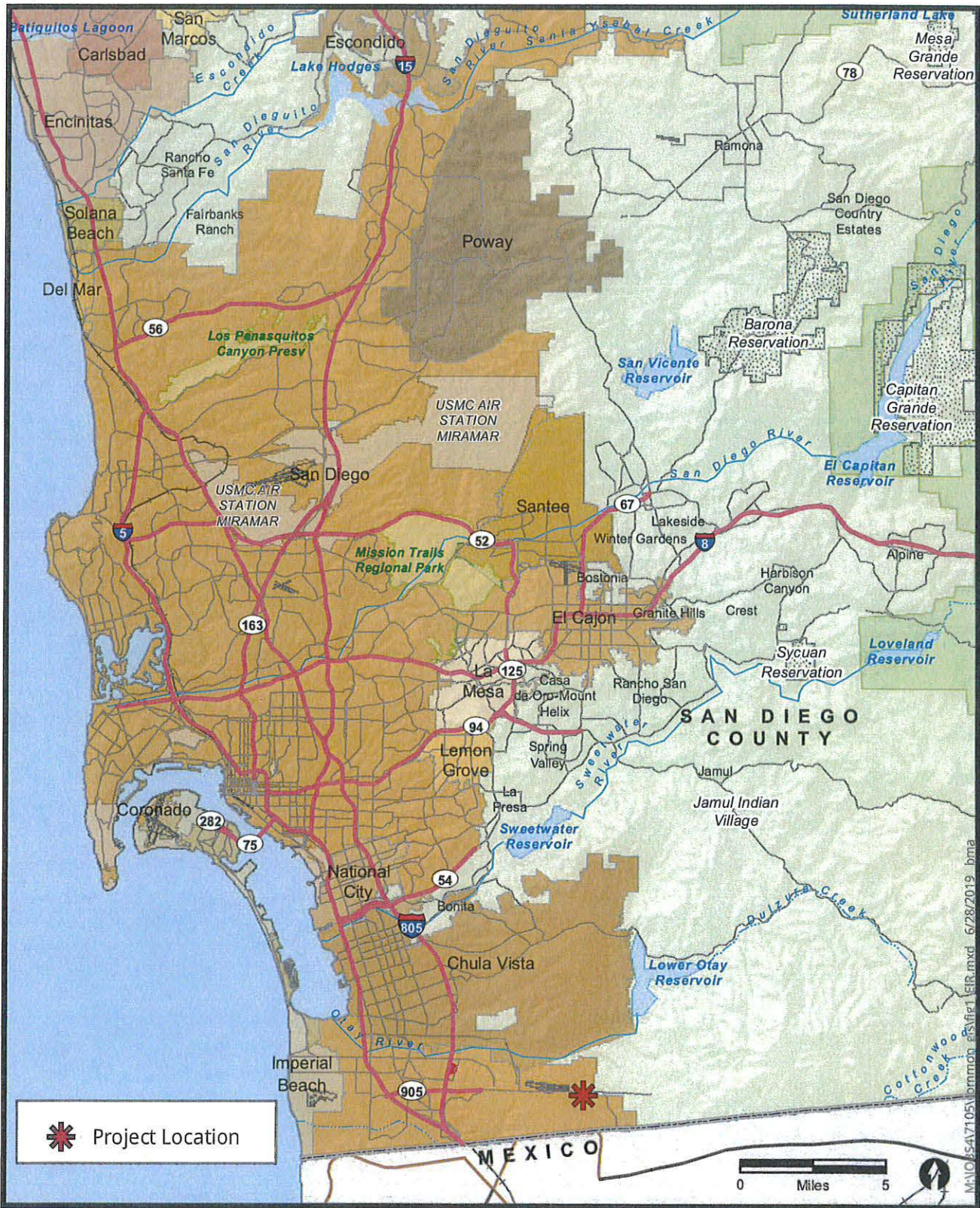
- 2017a Results of Historical Resources Survey of the La Media Retail Project. September.
- 2017b Waste Management Plan for the La Media Retail Project. September.
- 2019a Biological Resources Report for the La Media Retail Project. June.
- 2019b Air Quality CalEEMod Emission Calculation Output for the Retail Alternative. June.
- 2020a Addendum to the Results of Historical Resources Survey of the La Media Retail Project, San Diego, California. April 30.
- 2020b Addendum to the Waste Management Plan for the La Media Retail Project, San Diego, California. April 30.
- 2021a Air Quality CalEEMod Emission Calculation Output for the Industrial Alternative. April.
- 2021b Addendum to the Biological Technical Report for the La Media Retail Project, San Diego, California. January 29.

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- 2021 La Media Retail Transportation Impact Study. January 28.

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- 2019 Climate Action Plan Consistency Checklist for La Media Retail Project. June.



Regional Location

La Media Retail North/Project No. 334235

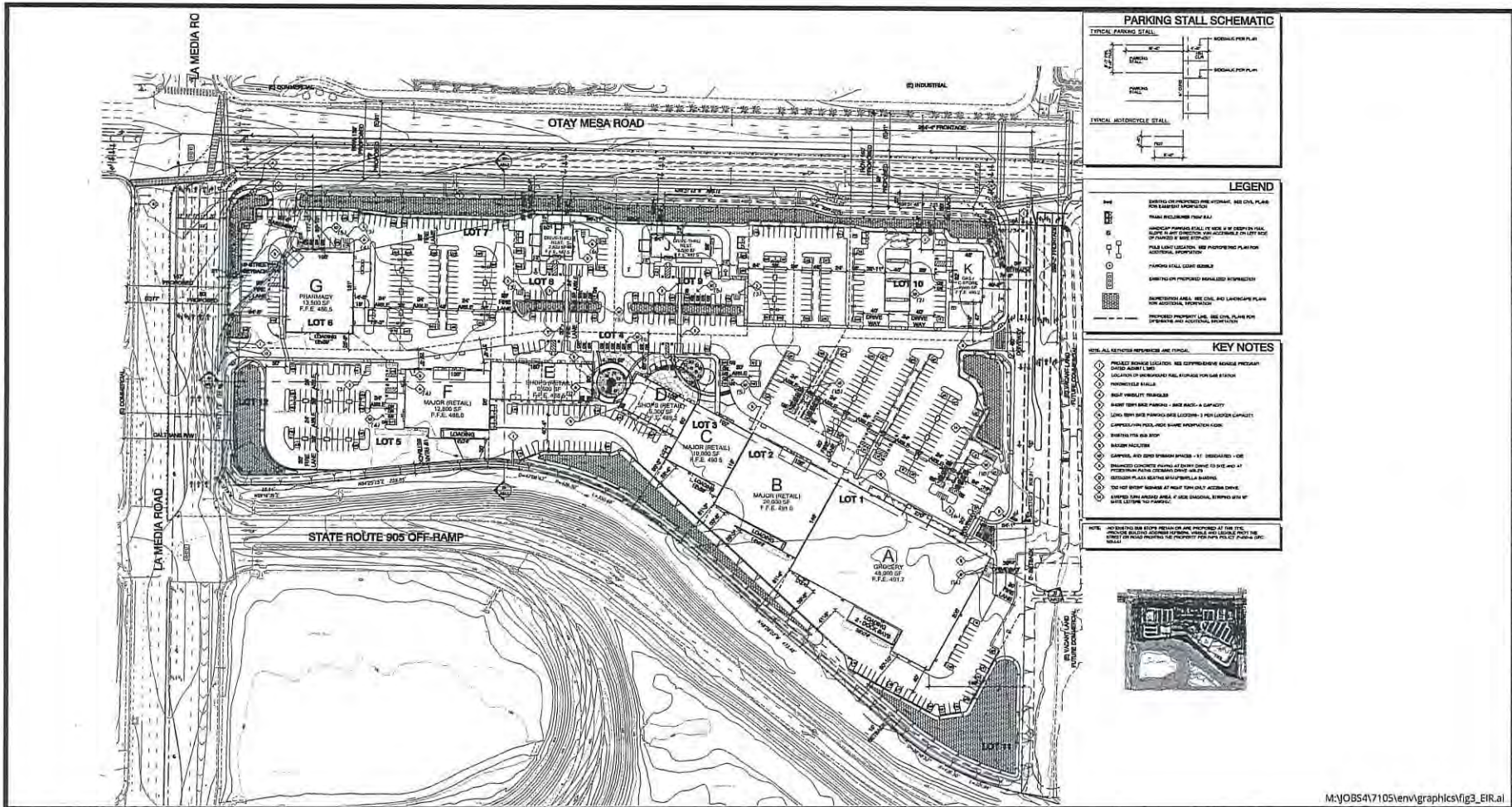
City of San Diego – Development Services Department

FIGURE
No. 1



Project Location on Aerial Photograph
La Media Retail North/Project No. 334235
City of San Diego – Development Services Department

FIGURE
No. 2



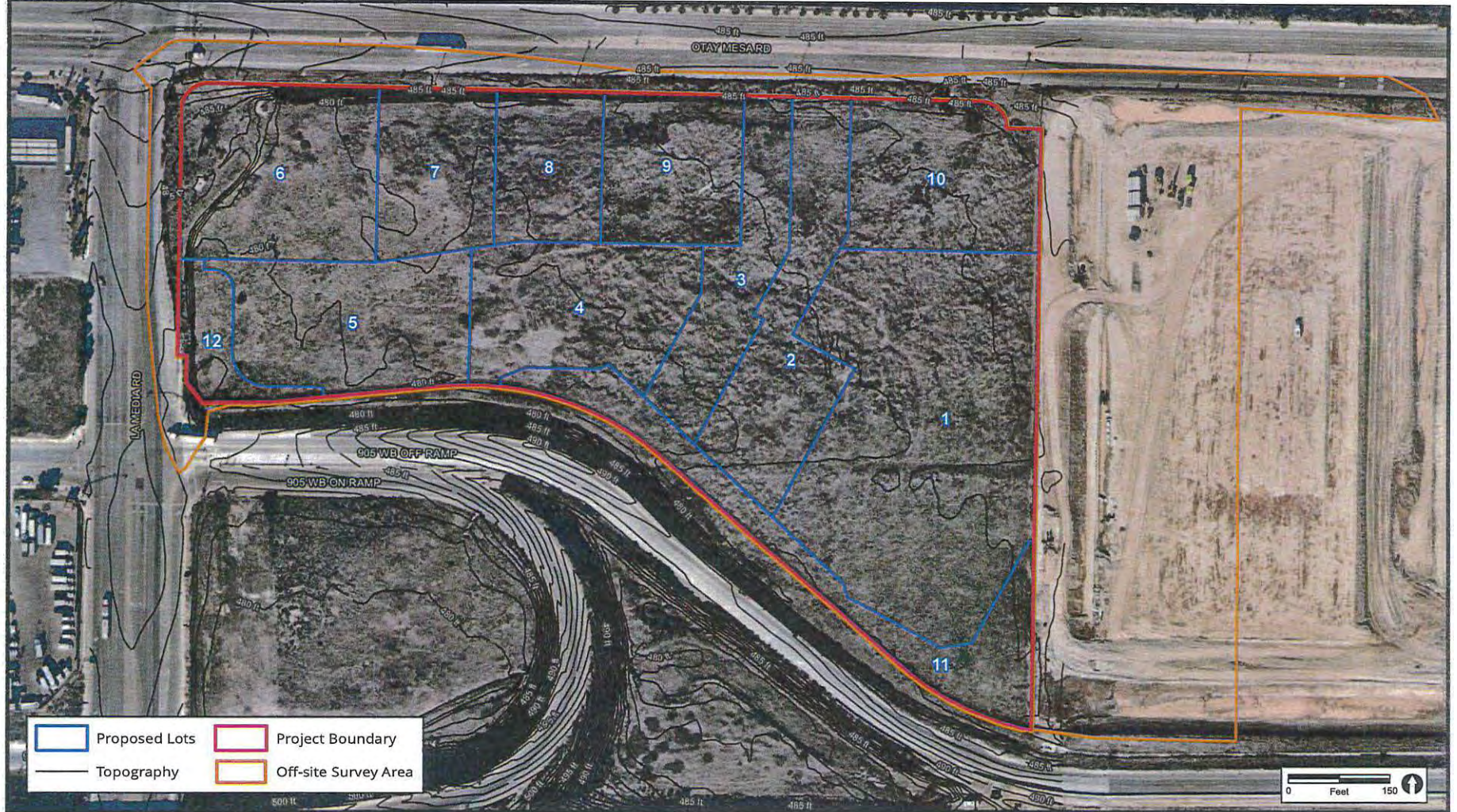
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Retail Alternative Site Plan
 La Media Retail North/Project No. 334235
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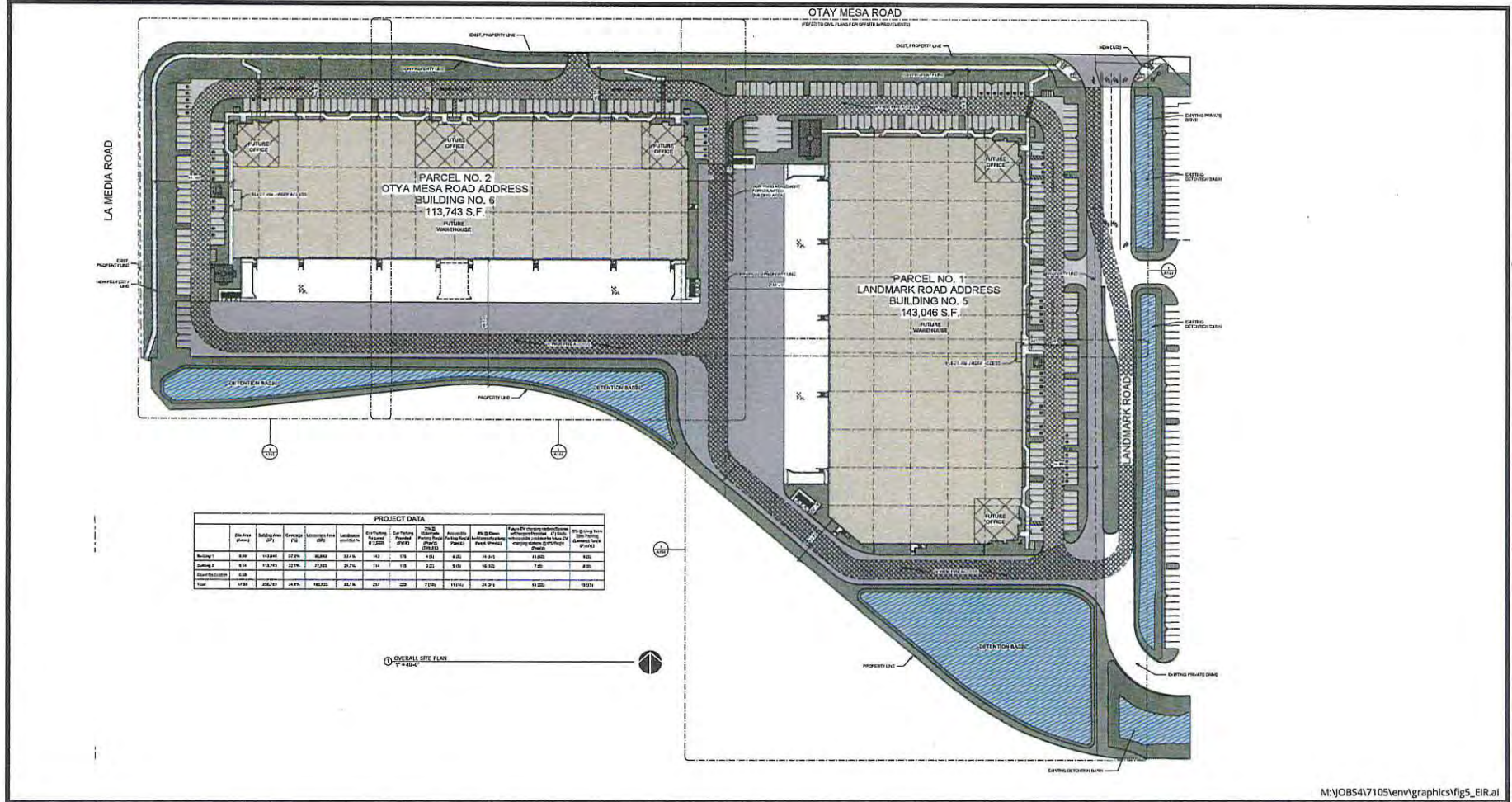
FIGURE
No. 3

Image Source: Nearmap (flown January 2021)



Retail Alternative Proposed Lot Layout
La Media Retail North/Project No. 334235
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**FIGURE
No. 4**

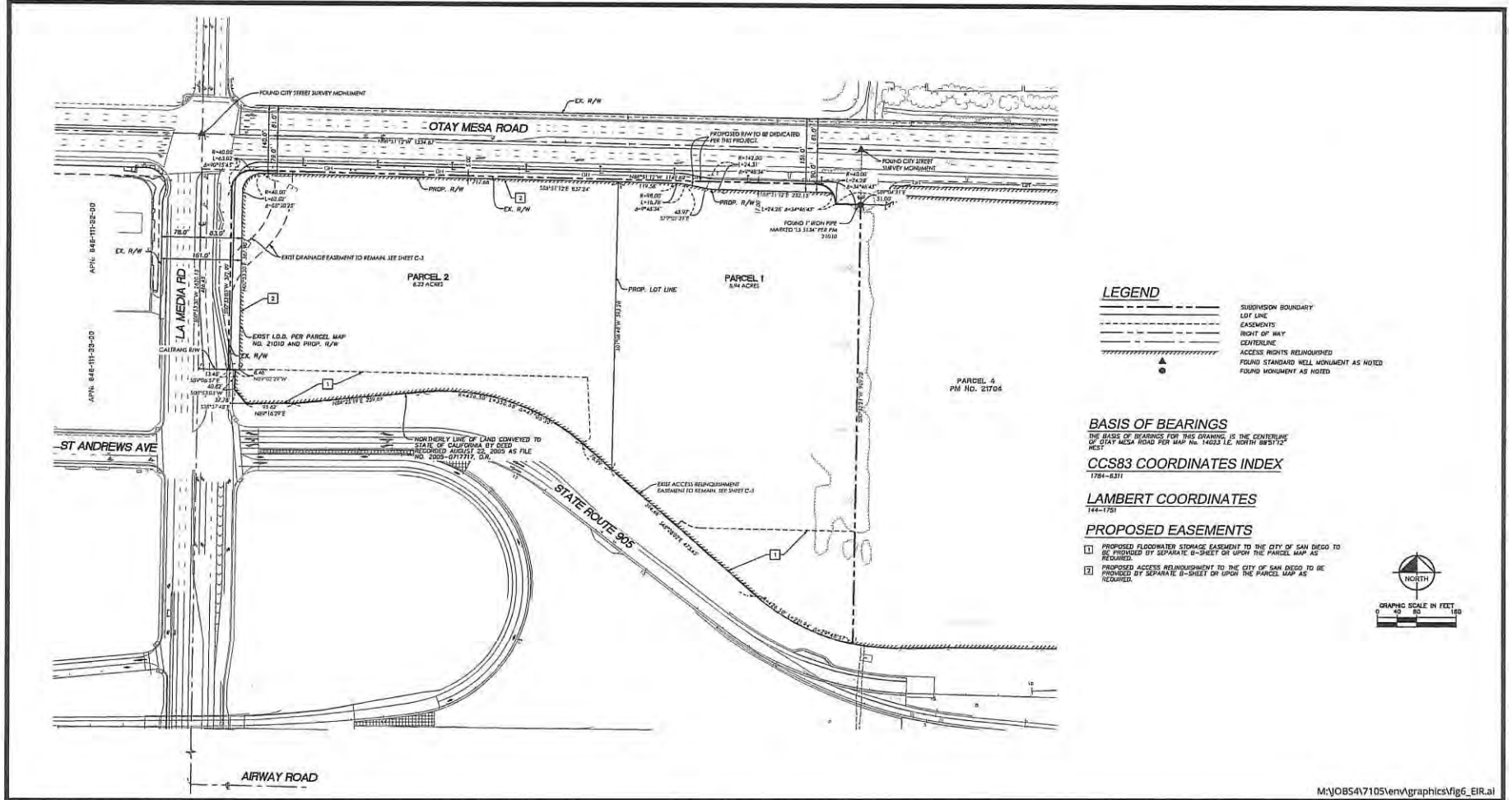


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Industrial Alternative Site Plan
 La Media Retail North/Project No. 334235
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**FIGURE
No. 5**



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Industrial Alternative Proposed Lot Layout

La Media Retail North/Project No. 334235

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**FIGURE
No. 6**