



THE CITY OF SAN DIEGO

ADDENDUM

Project No. 667298
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: La Media Road Improvement: A SITE DEVELOPMENT PERMIT to widen La Media Road from State Route 905 (SR-905) to Siempre Viva Road, widen the segment of Airway Road that crosses La Media Road, and implement drainage improvements at the intersection of La Media Road and Airway Road. The La Media Road Improvement Project (project) would widen a segment of the existing two-lane La Media Road to a six-lane Primary Arterial from SR-905 to Airway Road and to a five-lane Major between Airway Road and Siempre Viva Road with three southbound lanes and two northbound lanes. The project would also widen the segment of the existing two-lane Airway Road that crosses La Media Road to a four-lane Major. Widening of these segments of La Media Road and Airway Road would be consistent with the roadway classification in the Mobility Element of the Otay Mesa Community Plan. The project would introduce Class II Bike Lanes within La Media Road from SR-905 to Avenida de la Fuente, and along Airway Road. The City of San Diego would complete the remaining portion of the Class II Bike Lane on La Media Road from Avenida de la Fuente to Siempre Viva Road through future roadway improvements and associated partial property acquisitions. The project would also replace two culverts that cross beneath La Media Road at the intersection with Airway Road to improve stormwater flow through the project vicinity. Additional improvements would include the sidewalks, Americans with Disability Act (ADA) compliance, green street elements, streetlight relocations, and new signage and striping. Mitigation land acquisition located immediately southwest of the intersection of La Media Road and Airway Road would be required and utilized as the mitigation site for impacts to wetlands. Right-of-way acquisition would be required on the west side of La Media Road, as well as the northeast parcel of the La Media Road and Airway Road intersection. Acquisitions include irrevocable offers to dedicate, slope easements, drainage easements, and temporary construction easements. The project site is located immediately south of SR-905 and immediately north of Siempre Viva Road, in the Otay Mesa Community Plan area. The project site would be located in the Airport Land Use Compatibility Overlay Zone (Brown Field Airport), Airport Influence Area (Review Areas 1 and 2 - Brown Field Airport), Airports Safety Zones (Safety Zone 6 - Brown Field Airport), Overflight Notification Area, Federal Aviation Administration Part 77 Notification Area (Brown Field Airport). Applicant: City of San Diego, Engineering & Capital Projects Department.

I. SUMMARY OF ORIGINAL PROJECT

The project site is within the plan boundaries of Otay Mesa Community Plan (OMCP). The Otay Mesa Community Plan Update (OMCPU) Final Program Environmental Impact Report (PEIR) (Project No. 30330/304032; SCH No. 2004651076) (hereinafter referred to as the OMCPU Final PEIR) was certified by the San Diego City Council on March 11, 2014, Resolution No. R-308810. The OMCPU involved an update to the 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 Community Plan Implementation Overlay Zones (CPIOZs), amendments to the City of San Diego's (City's) Land Development Code (LDC), and an update of the Otay Mesa Community Plan Public Facilities Financing Plan (PFFP). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168, the OMCPU Final PEIR examined the environmental impacts of the OMCP.

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

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

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

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

As it pertains to the OMCP, the project site is identified as roadway uses associated with La Media Road and Airway Road, as well as portions of adjacent parcels that would be acquired through partial property acquisitions into City right-of-way (ROW).

II. SUMMARY OF PROPOSED PROJECT

A request for a SITE DEVELOPMENT PERMIT to widen La Media Road from State Route 905 (SR-905) to Siempre Viva Road, widen the segment of Airway Road that crosses La Media Road, and implement drainage improvements at the intersection of La Media Road and Airway Road. The project would widen a segment of the existing two-lane La Media Road to a six-lane Primary Arterial from SR-905 to Airway Road and to a five-lane Major Arterial between Airway Road and Siempre Viva Road with three southbound lanes and two northbound lanes. The project would also widen the segment of the existing two-lane Airway Road that crosses La Media Road to a four-lane Major. Widening of these segments of La Media Road and Airway Road would be consistent with the roadway classification in the Mobility Element of the OMCP.

The project would introduce Class II Bike Lanes within La Media Road from SR-905 to Avenida de la Fuente, and along Airway Road. The City would complete the remaining portion of the Class II Bike Lane on La Media Road from Avenida de la Fuente to Siempre Viva Road through future roadway improvements and associated partial property acquisitions.

Two culverts that cross beneath La Media Road at the intersection with Airway Road would also be replaced to improve stormwater flow through the project vicinity. These improvements would increase the storm water retention capacity in order to prevent flooding on Airway Road. Additional improvements would include the addition of sidewalks, Americans with Disability Act (ADA) compliance, green street elements, streetlight relocations, and new signage and striping. Mitigation Land acquisition located immediately southwest of the intersection of La Media Road and Airway Road would be required and utilized as the mitigation site for impacts to wetlands. Right-of-way acquisition would be required on the west side of La Media Road, as well as the northeast parcel of the La Media Road and Airway Road intersection. Acquisitions include irrevocable offers to dedicate, slope easements, drainage easements, and temporary construction easements.

Project construction would require 60,000 cubic yards of cut and 25,000 cubic yards of fill, resulting in a net export of 35,000 cubic yards of soil. All graded areas within the project footprint not permanently paved would be revegetated consistent with the requirements of the City's LDC Landscape Regulations Chapter 14, Article 2, Division 4. Figures 1 and 2 present the regional and project locations. Figure 3 presents the proposed site plan.

III. ENVIRONMENTAL SETTING

The project site consists of segments of La Media Road and Airway Road and portions of adjacent parcels that would be acquired through partial property acquisitions into City ROW. The project site is surrounded by existing industrial uses along the eastern project boundary south of the intersection with Airway Road, while land on the along the eastern project boundary north of the intersection with Airway Road is undeveloped. Land along the western project boundary is primarily undeveloped with a small number of industrial uses. The project site is relatively flat, with elevations ranging from 466 feet above mean sea level in the southern portion of the project site, to 482 feet above mean sea level along Airway Road in the eastern portion of the project site. Brown Field Municipal Airport is located approximately 0.25-mile north of the project site. The western project boundary along La Media Road is located within and adjacent to habitat preserved within the City's Multi-Habitat Planning Area (MHPA).

IV. ENVIRONMENTAL DETERMINATION

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

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous environmental document;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

V. IMPACT ANALYSIS

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

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

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

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

Table 1 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	Mitigated to a Level Less Than Significant
Historical Resources	Significant, but mitigated	Yes	No new impacts	Yes	Mitigated to a Level Less than Significant
Human Health/Public Safety/Hazardous Materials	Significant, but mitigated	Yes	No new impacts	No	Less than Significant
Hydrology/Water Quality	Significant but mitigated	Yes	No new impacts	No	Less than Significant

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

Land Use

OMCPU Final PEIR

Land Use is discussed in Section 5.1 of the OMCPU Final PEIR that concluded that implementation of the OMCPU 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. The OMCPU would require the conversion of industrial and agricultural lands to residential and other mixed uses. The environmental effects that would result include the increased potential for exposure of sensitive receptors to hazardous materials. Through implementation of the mitigation framework, 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 environmentally sensitive land (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 OMCP 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 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.

Project

The project is limited to widening of segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU. The project would not construct any structures, and the widened roadway segments would serve future growth that is already anticipated in the OMCPU. The City is currently in the process of making partial property acquisitions from adjacent properties that would be included in the expanded roadway footprints. Upon completion of these acquisitions, these property segments would be re-designated as City ROW, thereby ensuring consistency with land use and zoning designations within the General Plan and Community Plan. These partial property acquisitions would be limited to small strips of land at the parcel boundaries that would not affect existing uses on these properties, or otherwise affect the overall land use pattern. The City is also currently in the process of acquiring land immediately southwest of the intersection of La Media Road and Airway Road that would be utilized as a mitigation site for impacts to wetlands (see MM-BIO-7 and MM-BIO-8 below). The mitigation site is situated almost entirely within, as well as adjacent to, habitat preserved within the City's MHPA. Once acquired and after successful completion of the wetland mitigation effort, this mitigation site would be transferred to the City's Department of Parks and Recreation to be managed as open space. This property acquisition would not affect existing uses on adjacent properties, or otherwise affect the overall land use pattern. Therefore, the project would not divide an established community, and impacts would be less than significant.

The purpose of the ESL Regulations (LDC Sections 143.0101 – 143.0160) is to protect, preserve, and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The project site does not include steep hillsides, or coastal bluffs, and is not located within the 100-year floodplain. However, the project site does contain ESL due to the presence of sensitive biological resources, including land within the MHPA. The Biological Resources Report completed for the project included an MSCP Planning Policies and Design Guidelines consistency analysis that is presented below.

Roads and Utilities

1. *All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA.*

The project is not a utility line. Impacts were designed to create the minimum impact within the MHPA necessary to achieve the goals of improving traffic circulation and drainage within the project area.

2. *All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located and constructed to minimize environmental impacts.*

The project consists of widening of an existing road. Therefore, MHPA impacts would occur immediately adjacent to the existing roadway and would only extend into the MHPA to the minimum extent feasible.

3. *Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable.*

The project does not include any temporary roads or staging areas outside the assessed permanent and temporary impact footprints. Impacts within the MHPA are the minimum area feasible for construction, and all temporary impact areas, including within the MHPA, would be revegetated following construction.

4. *Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage.*

The project does not occur within a wildlife corridor and therefore would not disrupt corridor usage.

5. *Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads.*

The project consists of the widening of the existing La Media Road and Airway Road. Both La Media Road and Airway Road are identified in the Otay Mesa Community Plan as Community Corridors, and La Media Road is identified as a designated truck route for heavy trucks servicing the international Port of Entry (City of San Diego 2014). Therefore, while project impacts would occur in the MHPA, expansion of existing roadways is considered a compatible use within the MHPA and is consistent with the Otay Mesa Community Plan.

6. *Development of roads in canyon bottoms should be avoided whenever feasible.*

The project is not situated in a canyon bottom and therefore, avoids development of such roads.

7. *Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas.*

The project would widen existing roads, resulting in impacts to the MHPA. It would not be feasible to improve traffic circulation at the intersection of La Media Road and Airway Road without such widening. This impact would not cause habitat fragmentation or disruption of wildlife movement and impacts to potential wildlife breeding areas would be minimized.

8. *For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained.*

As the project consists of widening of existing roads, it would be considered a compatible use within the MHPA. La Media Road and Airway Road are existing roadways and are shown in the Otay Mesa Community Plan as Community Corridors and truck routes servicing the international Port of Entry (City of San Diego 2014). While this project would widen the roads and result in impacts to the MHPA, the project is consistent with the Community Plan and MSCP, and would thus be a compatible use within the MHPA.

Fencing, Lighting, and Signage

1. *Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent land uses compatible with the MHPA.*

Existing fencing is present along a portion of the west side of La Media Road adjacent to the MHPA. This fencing would be removed during construction, and no new permanent fencing would be installed. Overall, the proposed project is not expected to increase human or domestic animal access to the adjacent MHPA. Temporary orange fencing and silt fencing would be installed during construction to prevent unauthorized encroachment into the adjacent MHPA. Following construction, temporary fencing would be removed.

2. *Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife.*

Construction activities are expected to occur during the day and not require nighttime lighting. If night work is required, lighting would be shielded and directed away from the MHPA. There are existing streetlights on developed private properties east of La Media Road between Airway Road and Avenida de la Fuente. The project includes new street lighting along both sides of La Media Road and Airway Road, including adjacent to the MHPA. The streetlights would be directed down and shaded to prevent spillover into the MHPA.

3. *Signage will be limited to access and litter control and educational purposes.*

The project would not include any additional signage beyond that required for access control and/or educational purposes.

The Biological Resources Report completed for the project also included an MHPA Land Use Adjacency Guidelines (LUAG) consistency analysis that is presented below:

Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.

The proposed project is designed to improve drainage through the project area, while also widening La Media Road and Airway Road. While this would result in an increase of developed areas, it would improve water flow within the associated drainages. Runoff from the project area would flow through stormwater BMPs to prevent release of toxic toxins and other harmful materials into the MHPA.

Toxics

Land uses, such as recreation, urban landscaping, and agriculture, that use chemicals or generate by-products, such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by application or drainage of such materials into the MHPA.

The proposed project is not expected to cause release of toxics into the MHPA, as it does not propose the use of toxic chemicals or expected to produce harmful byproducts. During construction, the project would implement BMPs (such as use of drip pans and refueling vehicles away from drainages) during construction to prevent construction-related toxins from leaving the immediate project impact area.

Lighting

Lighting of all developed areas within and adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

All project activities will occur during the day and will require no nighttime lighting for construction. There are currently a number of streetlights within the project area, on developed private properties on the east side of La Media Road between Airway Road and Avenida de la Fuente. The project includes new street lighting along both sides of La Media Road and Airway Road, including adjacent to the MHPA. The streetlights would be directed down and shaded to prevent spillover into the MHPA.

Noise

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and other uses that may introduce noises

that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

The project occurs within and adjacent to the MHPA and construction activities have potential to cause noise impacts to western burrowing owl (*Athene cunicularia*; BUOW), which is assumed present in the non-native grassland to the west of La Media Road. The avian protection requirements described in the Mitigation Monitoring and Reporting Program would be implemented to prevent noise impacts to BUOW and any other sensitive bird species in the MHPA.

Barriers

New development within or adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation. Access to the MHPA, if any, should be directed to minimize impacts and reduce impacts associated with domestic pet predation.

Existing fencing is present along a portion of the west side of La Media Road adjacent to the MHPA. This fencing would be removed during construction, and no new permanent fencing would be installed. There is little pedestrian traffic in this area, but a high volume of vehicular traffic. While the project is located within and adjacent to the MHPA, widening the existing roadway is not expected to result in a substantial change to human or domestic animal access to the habitat within the MHPA.

Invasive Plants

No invasive plant species shall be introduced into areas adjacent to the MHPA.

The project would not introduce invasive plant species. Temporary impact areas would be revegetated following construction. Such revegetation would use a native seed mix and/or plant palette and a monitoring program, and no invasive plant species would be introduced.

Brush Management

New development located adjacent to the MHPA must be set back to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located in the MHPA except where narrow wildlife corridors require it to be located outside the MHPA. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible.

The proposed project does not include any new structures that would require brush management within the MHPA.

Grading/Land Development

Manufactured slopes associated with site development shall be included with the development footprint for projects within or adjacent to the MHPA.

All graded areas for the proposed project are included in the project impact footprint and no manufactured slopes would be located within the MHPA.

The project's consistency with the MSCP and MHPA LUAG presented above demonstrates that the project would be consistent with OMCPU Final PEIR mitigation framework measures BIO-1, BIO-2, and BIO-4. Therefore, the project would be consistent with the City's ESL Regulations.

The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. As described in the discussion of potential impact to historical resources below, the Historical Resources Surveys completed for the project site and proposed wetland mitigation site did not recommend a testing program for the portions of either CA-SDI-12,337 or CA-SDI-7208 within the project site, the field surveys did not identify any cultural material, and the Native American Heritage Commission's (NAHC's) records searches of their Sacred Lands File was negative. However, because the ground visibility was limited during the survey of the proposed mitigation site and the number of recorded cultural resources in the vicinity, implementation of project wetland mitigation would have the potential to impact buried unknown archaeological resources. The project would implement mitigation measure MM-HIST-1 Archaeological Monitoring, as detailed in the MMRP, to reduce impacts on historic resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure HIST-1. Additionally, the City's Development Services Department reviewed the project and determined that project site and proposed mitigation site are undeveloped, and neither possess any historic buildings, structures, or objects. Therefore, the project would be consistent with the City's Historical Resources Regulations.

Review of the Brown Field Municipal Airport, Airport Land Use Compatibility Plan (ALUCP) Exhibit III-1 Noise determined that the project site is located outside of the 60 A-weighted decibels [dB(A)] Community Noise Equivalent Level (CNEL) noise contour, and therefore would be exposed to aircraft noise levels less than 60 dB(A) CNEL. Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is located within Zone 6 Traffic Pattern Zone. Additionally, the project site is located within Airport Influence Area - Review Areas 1 and 2 for Brown Field Municipal Airport (the boundary separating both review areas crosses the project site), and within the Federal Aviation Administration (FAA) Part 77 Notification Area for Brown Field Municipal Airport. However, the project is limited to roadway and drainage improvements and would not construct any structures that could create a hazard related to air navigation. Therefore, project land uses would be compatible with the applicable airport compatibility plan, and impacts would be less than significant.

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

Visual Effects and Neighborhood Character

OMCPU Final PEIR

Section 5.2 of the OMCPU Final PEIR provides an analysis of visual effects and neighborhood character impacts associated with the OMCPU. Potential impacts could result to: 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 OMCP policies, as well as inclusion of these project design features, impacts to public views would be less than significant.

The OMCPU Final PEIR determined that impacts associated with compatibility with surrounding neighborhood character would be less than significant, as future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and Community Plan Update (CPU). 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 CPU. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element would be subject to review in accordance with CPIOZ A. Development proposals that do not comply with the CPIOZ A supplemental regulations would be subject to discretionary review in accordance with CPIOZ B. Therefore, impacts would be less than significant.

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

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 CPU. Therefore, impacts were determined to

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

Project

The project site is relatively flat and surrounded by existing industrial uses along the eastern project boundary south of the intersection with Airway Road, while land on the along the eastern project boundary north of the intersection with Airway Road is undeveloped. Land along the western project boundary is primarily undeveloped with a small number of industrial uses. The western project boundary along La Media Road is located within and adjacent to habitat preserved within the City's Multi-Habitat Planning Area (MHPA). 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 View Corridors are located within the project site at the intersections of La Media Road with Airway Road and Siempre Viva Road. However, the project is limited to roadway and drainage improvements, and would not construct any structures that could block views. Additionally, the project would introduce landscaping along all roadway improvements that would improve the visual quality through these view corridors. Therefore, the project would not change the existing character of the view corridor, would not block views through the corridor, and would improve the aesthetic quality of view corridor through project landscaping. The project would be compatible with the scale and design of surrounding development, and impacts would be less than significant.

Review of Figure 3-3 of the OMCPU Final PEIR determined that the project site is primarily located within the "South District," which consists of a mix of industrial, agricultural, and commercial uses. The portion of the project site north of Airway Road is located within the "Central District," which consists of a mix of undeveloped parcels, industrial and commercial uses, and scattered rural residences. The OMCPU Final PEIR determined that implementation of the OMCPU would result in the conversion of vacant parcels and agricultural uses that would result in an intensification of uses within both districts. The OMCPU Final PEIR determined that this intensification of uses would be consistent with the existing character of both districts, and that impacts would be less than significant. The project would be consistent with this conclusion reached in the OMCPU Final PEIR because it would widen segments of existing roadways that would support this anticipated intensification of uses. Additionally, the project would not construct any structures that could alter the existing visual character. Therefore, the project would be consistent with surrounding development, and impacts would be less than significant.

The project site does not contain any unique physical features such as a natural canyon or natural hillside slopes. The 25.58-acre project footprint would require 85,000 cubic yards of earthwork, which would exceed the City threshold of altering more than 2,000 cubic yards of earth per graded acre. However, the project would not meet any of the conditions that would result in a significant impact related to the City's threshold related to landform alteration. There are no steep hillsides on the project site due to the relatively flat elevations ranging from 466 to 482 feet above mean sea level. Similarly, the project would not require mass terracing of natural slopes due to the relatively flat nature of the site. Furthermore, the project would not create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Therefore, the project would not project

result in a substantial change in the existing landform or loss of unique physical features, and impacts would be less than significant.

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

Air Quality

OMCPU Final PEIR

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

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 changes 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 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 OMCP policies would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts associated with criteria pollutant emissions would remain significant and unavoidable.

The OMCPU Final PEIR identified impacts to sensitive receptors associated with carbon monoxide hotspots and diesel particulate matter would be less than significant, as there would be no harmful concentrations of carbon monoxide and localized air quality emissions would not exceed applicable standards, and the chronic risks resulting from diesel exhaust emissions associated with the vehicles operating within and adjacent to the 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 determined that impacts associated with collocation of sensitive receptors with commercial and industrial uses could result in exposure of sensitive receptors to toxic air emissions, resulting in a significant impact. The OMCPU Final PEIR included mitigation measure AQ-4, which requires a health risk assessment to be prepared for any project locating sensitive receptors closer than their recommended buffer distances to toxic air emitters. However, this impact likewise would remain significant and unavoidable.

The OMCPU Final PEIR concluded that there are no known sources of specific, long-term odors within the community plan area, and that none of the identified land uses would typically be associated with the creation of objectionable odors. In addition, the OMCPU Final PEIR concluded that since the 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 residential communities), impacts associated with odors would be less than significant.

Project

Project-specific construction air emissions were calculated using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Road Construction Emissions Model, Version 9.0 (2018) (RECON Environmental [RECON] 2020a) to assess potential air quality impacts consistent with the OMCPU Final PEIR mitigation framework.

The RAQS is the applicable regional air quality plan that sets forth the San Diego Air Pollution Control District's 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 San Diego Air Pollution Control District 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 is limited to widening segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU and associated drainage improvements. The project would not construct any housing or places of employment, and the widened roadway segments would serve future growth that is already anticipated in the OMCPU. Therefore, the project would not conflict with implementation of the RAQS, and impacts would be less than significant.

Construction-related activities generate temporary, short-term sources of air emissions. Sources of construction-related emissions include fugitive dust from grading activities, equipment exhaust, trips, and power consumption. Construction emissions were calculated using the SMAQMD Road Construction Emissions Model, Version 9.0 (2018). This model is applicable for all construction projects that involve construction equipment that is subject to California Air Resources Board (CARB) construction equipment emissions standards. The Roadway Construction Emissions Model is a spreadsheet-based model that is able to use basic project information (e.g., total construction months, project type, total project area) to estimate a construction schedule and quantify exhaust emissions from heavy-duty construction equipment, haul trucks, and worker commute trips associated with linear construction projects such as the proposed roadway widening and improvement project. Table 2 shows the total projected construction maximum daily emission levels for each criteria pollutant (RECON 2020a).

Table 2 compares project construction emissions to the City significance thresholds. As shown in Table 2, maximum daily construction emissions associated with the project are projected to be less

than the applicable thresholds for all criteria pollutants. Additionally, Table 2 shows that the project would not generate 100 pounds or more of particulate matter per day. The project would also implement standard dust control measures during construction that would further reduce emissions below what is presented in Table 2. Therefore, project construction would not exceed the NAAQS or CAAQS, or contribute to existing violations, and impacts would be less than significant.

Table 2 Summary of Worst-case Construction Emissions (pounds per day)						
Construction	Pollutant					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grubbing/Land Clearing	1	27	12	<1	21	5
Grading/Excavation	5	53	45	<1	22	6
Drainage/Utilities/Subgrade	3	27	29	<1	21	5
Paving	1	12	18	<1	1	1
Maximum Daily Emissions	5	53	45	<1	22	6
<i>Significance Threshold</i>	137	250	550	250	100	67
ROG = reactive organic gases; NO _x = oxides of nitrogen; CO = carbon monoxide; SO _x = oxides of sulfur; PM ₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less; PM _{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less						

Once construction is complete, the project would not result in an increase in vehicle trips and, except for periodic repaving activities, would not be a source of emissions. Paving emissions would be equal to or less than those shown in Table 2. Furthermore, the widened roadways would improve traffic flow on La Media Road and Airway Road, which would decrease emissions associated with vehicle congestion and idling. Therefore, project operation would not generate emissions that would exceed the NAAQS or CAAQS, or contribute to existing violations, and impacts would be less than significant.

Sensitive receptors include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The project is limited to widening of segments of La Media Road and Airway Road and would not introduce any sensitive receptors. Additionally, there are no existing sensitive receptors located within the immediate vicinity of the project site. The closest sensitive receptor is Southwestern College, located approximately 1,500 feet to the west, which would not be affected by project emissions due to the distance from the roadway. The project site is surrounded by a mix of industrial development and open space that does not possess any sensitive receptors. Therefore, the project would not expose sensitive receptors to substantial levels of pollution, and impacts would be less than significant.

The project would not be an operational source of odors. During construction, diesel equipment may generate some temporary nuisance odors. However, there are no sensitive receptors in the immediate vicinity of the project site. Therefore, the project is not expected to generate significant objectionable odors affecting a substantial number of people, and impacts would be less than significant.

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

Biological Resources

OMCPU Final PEIR

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 project level mitigation measures consistent with its mitigation framework measure BIO-1, which requires site-specific biological surveys to determine the potential for sensitive species, along with the provision for the proposal for site-specific mitigation, if necessary, to reduce impacts to sensitive species or habitats. Specifically, BIO-1 requires future projects to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should BUOW habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed. Measures to avoid and minimize impacts to BUOW shall be included in a conceptual BUOW mitigation plan, which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts. Implementation of the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

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

The 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. Measure BIO-1 would reduce impacts to sensitive habitat to a level less than significant. Additionally, compliance with OMCP policies and established development standards and regulations would reduce impacts to sensitive habitats to a level less than significant.

The OMCPU Final PEIR identified potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because any adjustments would be required to meet the equivalency criteria for City and Wildlife Agency approval. The OMCPU Final PEIR determined that MHPA adjacency impacts would be addressed at the project-level, and projects adjacent to MHPA areas would be required to comply with the MHPA Land Use Adjacency Guidelines and implement mitigation measure LU-2, which would reduce MHPA

adjacency impacts to a level less than significant. The OMCPU Final PEIR also determined that the 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 MSCP Subarea Plan policies and design guidelines, including specific Management Directives for Otay Mesa, and no significant impacts relating to MSCP consistency would occur.

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 level less than significant.

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, California Department of Fish and Wildlife, 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 framework measure BIO-4, which would reduce impacts to wetlands to a level less than significant. Additionally, the City approved the Vernal Pool Habitat Conservation Plan (VPHCP) after certification of the OMCPU Final PEIR. Therefore, future projects must also demonstrate consistency with the VPHCP.

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 level less than significant with implementation of mitigation framework measures BIO-1 through BIO-4 and LU-2.

Project

Consistent with the OMCPU Final PEIR mitigation framework for the OMCPU, a site-specific Biological Technical Report was prepared by RECON Environmental, Inc. (RECON 2021a). The Biological Technical Report established a 58.64-acre biological survey area that encompassed the project footprint and a surrounding 100-foot buffer. Table 3 presents the acreages of the vegetation communities and land cover types located within the biological survey area. As detailed in the Biological Technical Report, 13 vernal pools were identified within the survey area, each of which supported one or more vernal pool indicator plants. The vernal pools mapped in the northern portion of the survey area (i.e., northwest of the intersection of La Media Road and Airway Road) are identified in the VPHCP as the Empire Center complex, or complex J 27 (City of San Diego 2017). The vernal pools mapped southwest of this intersection are not a part of a previously recorded vernal pool complex but are located a minimum of 300 feet east of pools within the La Media Swale North complex, or J 28 East (City of San Diego 2017).

Table 3 Vegetation Communities/Land Cover Types			
Community or Type (Holland Code as modified by Oberbauer)	Acres		
	Outside MHPA	Inside MHPA	Total
Wetland Communities			
Vernal pool (44000)	0.15	0.31	0.46
Freshwater marsh (52400)	0.35	1.15	1.50
Emergent wetland (52440)	0.16	0.86	1.02
Mule fat scrub (63310)	0.20	–	0.20
Southern willow scrub (63320)	0.46	0.13	0.59
Subtotal	1.32	2.45	3.77
Tier I – III Communities			
Diegan coastal sage scrub (32500)	0.98	–	0.98
Non-native grassland (42200)	6.69	3.65	10.34
Subtotal	7.67	3.65	11.32
Tier IV and Developed Land			
Disturbed land (11300)	16.99	0.41	17.40
Urban/developed land (12000)	26.03	0.12	26.15
Subtotal	43.02	0.53	43.55
TOTAL	52.01	6.63	58.64
MHPA = Multi-Habitat Planning Area			

Table 4 presents the acreages of temporary and permanent impacts that would occur during project construction. Under the City's ESL regulations, lands designated as Tier IV are not considered to have significant habitat value. Therefore, temporary and permanent impacts to Tier IV disturbed land and urban/developed land would not be considered significant, and no mitigation would be required. However, impacts to land designated as Wetlands Communities or Tier I – III Communities would be considered significant and require mitigation. The project would implement mitigation measures MM-BIO-1 and MM-BIO-2, as detailed in the MMRP, to reduce impacts on vegetation communities to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure BIO-1. Impacts to vernal pools would require mitigation at a minimum 2:1 ratio, for a total of 0.30 acre of mitigation. This mitigation would occur through a combination of vernal pool restoration and enhancement at a vernal pool mitigation site located on eight one-acre City-owned parcels within the MHPA in western Otay Mesa (RECON 2021b).

The impacts to freshwater marsh, emergent wetland, mule fat scrub, and southern willow scrub would be mitigated at a 2:1 ratio through a combination of restoration, enhancement, and preservation within the wetland mitigation site located adjacent to the project footprint south of Airway Road and west of La Media Road (RECON 2021c).

Impacts to Diegan coastal sage scrub and non-native grassland would be mitigated in accordance with the ratios set forth in the Biology Guidelines (City of San Diego 2018). Mitigation to offset impacts to Tier II and III vegetation communities would occur through restoration and preservation of 6.666 acres of maritime succulent scrub at the vernal pool mitigation site described above (RECON 2021b). Any mitigation achieved at the mitigation sites not needed for this project will be available for future City projects.

Table 4 Impacts to Vegetation Communities/Land Cover Types										
Vegetation Community	Survey Area Total			Permanent Impacts			Temporary Impacts			Total Impacts
	Outside MHPA	Inside MHPA	Total	Outside MHPA	Inside MHPA	Total	Outside MHPA	Inside MHPA	Total	
Wetland Communities ^a										
Vernal pools ^b	0.15	0.31	0.46	0.14	0.01	0.15	–	–	0.02	0.15
Freshwater marsh	0.35	1.15	1.50	0.24	0.40	0.64	0.01	0.04	0.05	0.69
Emergent wetland	0.16	0.86	1.02	0.14	0.39	0.53	0.01	0.07	0.08	0.61
Mule fat scrub	0.20	–	0.20	–	–	–	0.01	–	0.01	0.01
Southern willow scrub	0.46	0.13	0.59	0.15	0.06	0.21	0.07	–	0.07	0.28
Subtotal	1.32	2.45	3.77	0.65	0.86	1.51	0.12	0.11	0.23	1.74
Tier I – III Communities										
Diegan coastal sage scrub	0.98	–	0.98	0.28	–	0.28	0.15	–	0.15	0.43
Non-native grassland	6.69	3.65	10.34	2.49	0.85	3.34	0.66	0.35	1.01	4.35
Subtotal	7.67	3.65	11.32	2.77	0.85	3.62	0.81	0.35	1.16	4.78
Tier IV and Developed Land										
Disturbed land	16.99	0.41	17.40	6.17	0.28	6.45	1.72	0.04	1.76	8.21
Urban/developed land ^a	26.03	0.12	26.15	7.70	0.03	7.73	3.11	0.01	3.12	10.85
Subtotal	43.02	0.53	43.55	13.87	0.31	14.18	4.83	0.05	4.88	19.06
TOTAL	52.01	6.63	58.64	17.29	2.02	19.31	5.76	0.51	6.27	25.58
^a Wetlands and urban/developed land have not been assigned a habitat tier per the City's Biology Guidelines (2018).										
^b The project would impact three vernal pools. The majority of the impacts would occur within the permanent impact footprint, with smaller portions in the temporary impact area or outside the impact footprints. Because the function of the impacted pools would be permanently altered by construction, the entire area of all impacted vernal pools is considered permanently impacted.										

San Diego fairy shrimp (*Branchinecta sandiegonensis*) were identified in one ponded basin (identified as Basin 81 in the 2015 fairy shrimp report [Busby Biological Services 2015]) within an area of restored Diegan coastal sage scrub in the northern portion of the survey area. Non-sensitive variable fairy shrimp (*Branchinecta lindahli*) and an unidentified *Branchinecta* believed to be variable fairy shrimp were also identified in two other basins that also lacked vernal pool indicator species (Basin 40 and Basin 8a-c, respectively; Busby Biological Services 2015). Additionally, updated San Diego fairy shrimp surveys were not conducted, so the vernal pools within the survey area are assumed occupied. Although the project was designed to avoid impacts to vernal pools and their watersheds where feasible, project construction would still impact three vernal pools assumed to be occupied by San Diego fairy shrimp that would be considered significant and require mitigation. The project would also reduce wetland buffers, which would be considered significant and require mitigation. Under current conditions, the minimum buffer width for wetland habitats is zero feet where wetlands occur directly adjacent to La Media Road or Airway Road, or where there are culverts directing flows under these roadways. Following completion of the project, there would be no change in the minimum wetland buffer width, as wetlands would continue to occur directly adjacent to the roadways and culverts. As described in the wetland mitigation plan, the existing wetlands and vernal pools on the wetland mitigation site would be enhanced (0.74 acre and 0.24 acre, respectively), additional wetlands would be created (3.01 acres), and the adjacent non-native

grasslands would be enhanced (1.98 acres). This creation and enhancement would improve the quality and biological function of the wetland buffer on the wetland mitigation site.

The current buffer width for vernal pools within the survey area is approximately 50 feet for the J 27 complex and the pools south of Airway Road that are not in an identified complex, and 20 feet for the J 28 E complex. Following project completion, the buffer for the vernal pools would be reduced to approximately 10 to 15 feet for the J 27 complex and 35 feet for the pools south of Airway Road; the pools in the survey area that are part of the J 28 E complex would be impacted. While the buffer width for non-impacted vernal pools would be reduced, the wetland mitigation plan would enhance habitat quality for the vernal pool located in the wetland mitigation site. In addition, indirect impacts to the vernal pools would be minimized, as the project was designed to completely avoid the watersheds of non-impacted pools, and drainage from the project site would be directed into the storm drain system away from the vernal pools.

The VPHCP provides coverage for threatened and endangered vernal pool species, including San Diego fairy shrimp, which do not currently have federal coverage under the City's MSCP Subarea Plan. Per Section 5.2.1 of the VPHCP, implementation of the general Avoidance and Minimization Measures would be required to prevent indirect impacts to vernal pools and associated species. These measures, which would become conditions of project approval, are as follows:

1. Any development adjacent to the MHPA shall be constructed to slope away from the extant pools to be avoided, to ensure that runoff from the project does not flow into the pools.
2. Temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) are required to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include illustrations that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.
3. Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.
4. A qualified monitoring biologist that has been approved by the City shall be on-site during project construction activities to ensure compliance with all mitigation measures identified in the CEQA environmental document. The biologist shall be knowledgeable of vernal pool species biology and ecology. The biologist shall perform the following duties:
 - a. Oversee installation of and inspect the fencing and erosion control measures within or upslope of vernal pool restoration and/or preservation areas a minimum of once per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.
 - b. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.

- c. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training shall include (1) the purpose for resource protection; (2) a description of the vernal pool species and their habitat(s); (3) the conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing); (4) environmentally responsible construction practices as outlined in measures 5, 6, and 7; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and (6) the general provisions of the project's mitigation monitoring and reporting program, the need to adhere to the provisions of the federal ESA, and the penalties associated with violations.
 - d. Halt work, if necessary, and confer with the City to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to the City within 24 hours of its occurrence.
 - e. Submit regular (e.g., weekly) letter reports to the City during project construction and a final report following completion of construction. The final report shall include as-built construction drawings with an overlay of habitat that was impacted and avoided, photographs of habitat areas that were avoided, and other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with all conservation measures was achieved.
5. The following conditions shall be implemented during project construction:
- a. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint.
 - b. The project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the site.
 - c. Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.
6. All equipment maintenance, staging, parking, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering the vernal pools or their watersheds, and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from the vernal pools or their watersheds. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. A spill kit for each piece of construction equipment shall be on-site and must be used in the event of a spill. "No fueling zones" shall be designated on construction plans.

7. Grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. To achieve this goal, grading adjacent to avoided pools shall comply with the following:
 - a. Grading shall occur only when the soil is dry to the touch both at the surface and 1 inch below. A visual check for color differences (i.e., darker soil indicating moisture) in the soil between the surface and 1 inch below indicates the soil is dry.
 - b. After a rain of greater than 0.2 inch, grading shall occur only after the soil surface has dried sufficiently as described above, and no sooner than 2 days (48 hours) after the rain event ends.
 - c. To prevent erosion and siltation from stormwater runoff due to unexpected rains, BMPs (e.g., silt fences) shall be implemented as needed during grading.
 - d. If rain occurs during grading, work shall stop and resume only after soils are dry, as described above.
 - e. Grading shall be done in a manner to prevent runoff from entering preserved vernal pools.
 - f. If necessary, water spraying will be conducted at a level sufficient to control fugitive dust but not to cause runoff into vernal pools.
 - g. If mechanized grading is necessary, grading will be performed in a manner to minimize soil compaction (i.e., use the smallest type of equipment needed to feasibly accomplish the work).
8. As detailed in the vernal pool mitigation plan (RECON 2021b), no topsoil would be salvaged or transplanted from the impacted pools on-site due to the occurrence of the non-native versatile fairy shrimp.
9. Permanent protective fencing shall be used along any interface with developed areas and/or other measures approved by the City to deter human and pet entrance into on- or off-site habitat shall be installed. Fencing shall be shown on the development plans and should have no gates (accept to allow access for maintenance and monitoring of the biological conservation easement areas) and be designed to prevent intrusion by pets. Signage for the biological conservation easement area shall be posted and maintained at conspicuous locations. The requirement for fencing and/or other preventative measures shall be included in the project's mitigation plan.

Implementation of the conditions of approval described above would serve to reduce impacts to a level less than significant. The project has also developed a mitigation plan consistent with the requirements of the VPHCP. The project would implement mitigation measure MM-BIO-3, as detailed in the MMRP, which would mitigate impacts to San Diego fairy shrimp through inoculation of restored and/or enhanced pools at the vernal pool mitigation site located on eight one-acre City-

owned parcels within the MHPA in western Otay Mesa (RECON 2021b). Due to the presence of the non-native versatile fairy shrimp, salvaged topsoil would not be sourced from the impacted pools on site. The project would also implement mitigation measure MM-BIO-4, as detailed in the MMRP, which would ensure that project would be consistent with the VPHCP General Conditions for Compensatory Mitigation. Implementation of these mitigation measures would reduce impacts on vernal pools and San Diego fairy shrimp to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure BIO-1.

Three sensitive plant species—San Diego button-celery (*Eryngium aristulatum* var. *parishii*), San Diego marsh-elder (*Iva hayesiana*), and southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*)—were observed within the survey area. However, all three sensitive plant species were detected outside the project footprint, and therefore would not be impacted during construction. San Diego button-celery is an MSCP covered species subject to a condition of coverage that requires specific measures to protect against detrimental edge effects. To comply with this condition, the project was designed to minimize impacts to only three vernal pools, none of which contain San Diego button-celery. Therefore, the project is consistent with the MSCP condition of coverage for San Diego button-celery, and no additional mitigation would be required.

San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) was detected in the survey area, and the non-native grassland west of La Media Road is suitable and likely to support the species. However, this is a highly mobile species that is expected to be able to avoid construction equipment. Therefore, no impacts to this species would occur.

Focused breeding season surveys were conducted for BUOW in 2019 that were negative (RECON 2019). Prior to these surveys, focused BUOW surveys within the survey area were conducted in 2011 and 2016 (ESA 2015, ECORP 2018, respectively). The surveys conducted in 2016 identified five occupied burrows were found in the non-native grassland southwest of the intersection of La Media Road and Airway Road¹. All five of these burrows are located outside the project footprint, with the nearest being 200 feet west of the project footprint. However, the non-native grassland and disturbed land within the survey area west of La Media Road and south of Airway Road is considered occupied foraging habitat, but not occupied burrows are present within the survey area. The project would impact 4.16 acres of occupied BUOW foraging habitat, including 1.07 acres within the MHPA and 3.09 acres outside the MHPA. Therefore, the project would impact BUOW foraging habitat, which would be considered significant and require mitigation. The project would implement mitigation measure MM-BIO-5, as detailed in the MMRP, which would implement Western Burrowing Owl Preconstruction Avoidance Measures. The project would also implement MM-BIO-6, which would mitigate impacts to non-native grasslands considered occupied by BUOW by restoring and enhancing the upland areas surrounding the vernal pools to support BUOW owl habitat. Implementation of these mitigation measures would reduce impacts on BUOW to a level less than

¹ The Metropolitan Airpark Project Burrowing Owl Mitigation Plan (ESA 2015) notes that HELIX Environmental Planning conducted BUOW surveys in 2011 within the portion of the current project site west of La Media Road. Seven BUOW were reported southeast of the intersection of Airway Road and La Media Road but were not shown on a map. The locations described were developed prior to 2011, so it is assumed an error was made and the observations were actually made within the area southwest of the intersection that were identified in the 2016 surveys.

significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure BIO-1.

California horned lark (*Eremophila alpestris actia*) has moderate potential to occur in the disturbed land in the southwestern portion of the survey area. This species has potential to be directly impacted if removal of vegetation occurs during the nesting season of February 1 to September 15. Similarly, nesting birds and raptors covered by California Fish and Game Code 3503 and 3503.5 have the potential to be directly impacted if removal of vegetation occurs during the nesting season of February 1 to September 15. Impacts to California horned lark and nesting birds and raptors would be considered significant and require mitigation. The project would implement mitigation measure MM-BIO-1, as detailed in the MMRP, to reduce impacts on California horned lark to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure BIO-2.

The Biological Technical Report included a routine jurisdictional waters/wetland delineation of the survey area consistent with the guidelines set forth by the U.S. Army Corps of Engineers (USACE; 1987, 2008a, 2008b). Table 5 presents the acreage of USACE, California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and City wetlands identified within the survey area.

Table 5 Summary of Jurisdictional Waters	
Jurisdictional Areas	Acres
USACE Waters of the U.S.	
Wetland Waters of the U.S. ^a	3.54
RWQCB Waters of the State	
Wetland Waters of the State ^a	3.57
CDFW Waters of the State	
Wetland Waters of the State ^a	3.57
City of San Diego Wetlands	
Wetlands	3.57
^a RWQCB, CDFW, and City wetlands entirely overlap. USACE wetland waters fall within RWQCB/CDFW wetland but exclude small areas of emergent wetland in the west-central portion of the survey area.	

The project includes improvements to the on-site drainages to improve water flow and prevent flooding of existing roadways. As a result, impacts to wetlands and waters are unavoidable. Table 6 presents the acreage of temporary and permanent impacts to USACE, CDFW, RWQCB, and City jurisdictional wetland and waters. Impacts to these jurisdictional resources would be considered significant and require mitigation. The project would implement mitigation measure MM-BIO-7, as detailed in the MMRP, to mitigate impacts on USACE, CDFW, RWQCB, and City jurisdictional wetland and waters at a 2:1 ratio at the proposed wetland mitigation site located immediately adjacent to the project footprint south of Airway Road and west of La Media Road. The project would implement mitigation measure MM-BIO-8, as detailed in the MMRP, to mitigate 1.52 acres of permanent impacts and 0.22 acre of temporary impacts to City wetlands at a ratio of 2:1 for a total of 3.48 acres of mitigation. Impacts to vernal pools would be mitigated with creation, restoration, and enhancement as described in the vernal pool mitigation plan (RECON 2021b), and impacts to

freshwater marsh, emergent wetland, mule fat scrub, and southern willow scrub would be mitigated with creation, restoration, and enhancement as described in the wetland mitigation plan (RECON 2021c). Any mitigation acreage at the wetland mitigation site not needed for this project will be available for future City projects. Implementation of these mitigation measures would reduce impacts on wetlands to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure BIO-4.

Table 6 Impacts to Jurisdictional Resources ^a			
Jurisdictional Areas	Permanent Impact	Temporary Impact	Total Direct Impacts
USACE Waters of the U.S. – USACE			
Wetland Waters of the U.S.	1.51	0.22	1.73
RWQCB Waters of the State			
Wetland Waters of the state	1.52	0.22	1.74
CDFW Waters of the State			
Wetland Waters of the state	1.52	0.22	1.74
City Wetlands			
Wetlands	1.52	0.22	1.74
^a All areas are presented in acres rounded to the nearest 0.01.			

The survey area consists of a matrix of developed and disturbed, undeveloped areas. A drainage with wetland/riparian vegetation runs north-south along the western side of the survey area, which is heavily constrained by development and would not be considered a wildlife movement corridor. Furthermore, the site is not designated as a MSCP regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. Therefore, the project site would not be considered a significant wildlife movement corridor. No impact would occur.

As described in the Land Use section above, the Biological Resources Report completed for the project included an MSCP Planning Policies and Design Guidelines consistency analysis, as well as an MHPA LUAG consistency analysis. These analyses determined that the project would not conflict with any MSCP Planning Policies and Design Guidelines or MHPA LUAG. Therefore, the project would be consistent with OMCPU Final PEIR mitigation framework measure LU-2.

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

Historical Resources

OMCPU Final PEIR

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 that could result in a potentially significant impact to prehistoric or historic resources and would be required to implement mitigation framework measures HIST-1 and HIST-2.

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

Project

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Historical Resources Survey was prepared for the project site by RECON (RECON 2020b). A records search with a one-half mile radius buffer around the project site was requested from the South Coastal Information Center (SCIC) at San Diego State University, which identified a total of 33 cultural resources. Additionally, RECON reviewed the results of SCIC records search completed within a one-mile search radius that identified an additional 54 cultural resources. Between both record searches, a total of 87 cultural resources were identified within one mile of the project site.

The SCIC identified two prehistoric archaeological sites within the project boundary. CA-SDI-12,337 is mapped in the northeast quarter of the intersection of La Media Road and Airway Road. The site covers over 700 acres and extends north along the east side of La Media Road for approximately 2,000 meters and along the north side of Airway Road for approximately 1,700 meters. Different portions of what is now CA-SDI-12,337 have been tested in the past for various specific development projects, and these tests have determined the site lacks subsurface deposits and is not a significant historical resource under the City's criterion.

CA-SDI-7208 is mapped in the northwest quarter of the intersection of La Media Road and Airway Road. The site extends west to Britannia Boulevard, north to Otay Mesa Road, and south to the international border. The site encompasses approximately 720 acres and consists of a light lithic scatter covering the entire site area with scattered areas of concentrated artifacts. Most of the site was disturbed by farming in the past and several areas have been developed. Portions of the site have been evaluated for significance under the City, CEQA, or National Register of Historic Places guidelines, and none have been determined to be significant.

A letter was sent to the NAHC on March 25, 2019, requesting them to search their Sacred Lands File. A response letter from the NAHC was received on April 23, 2019, indicating the results of the Sacred Lands File search for the project site was negative.

The project site was surveyed on March 19, 2019 by RECON archaeologists Harry J. Price and Nathaniel Yerka, accompanied by Shuuluk Linton, a Native American Monitor from Red Tail Environmental. The project area was subsequently revised and extended approximately 186 meters (611 feet) east along Siempre Viva Road in January 2020. Based on review of an aerial photograph, this area has been heavily disturbed and has a low likelihood of containing significant cultural

resources. Therefore, this additional portion of the project site was not surveyed. No previously unrecorded prehistoric historical resources were found during the survey. No evidence of CA-SDI-12,337 or CA-SDI-7208 that were identified in the SCIC record search was observed during the survey. Due to the repeated testing of other portions of both sites that determined they do qualify as significant historical resources, and the lack of observed artifacts in the project site, the Historical Resources Survey did not recommend a testing program for the portions of either CA-SDI-12,337 or CA-SDI-7208 within the project site. Furthermore, the Historical Resources Survey did not recommend additional cultural resources work, such as construction monitoring due to the disturbed nature of the majority of the project site, no previously unrecorded cultural resources were identified during the field survey, and tests of the two previously recorded sites within the project have consistently determined they do qualify as significant historical resources.

Additionally, the City's Development Services Department reviewed the project site and proposed mitigation site and determined that neither possess any historic buildings, structures, or objects. Therefore, OMCPU Final PEIR mitigation framework measure HIST-2 would not apply. No known burial sites or cemeteries exist within the project site, and it is not expected that human remains would be discovered during construction. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and state Health and Safety Code (Section 7050.5) shall be undertaken.

Consistent with the OMCPU Final PEIR mitigation framework, a site-specific Historical Resources Survey was also completed for the land immediately southwest of the intersection of La Media Road and Airway Road that would be utilized as a mitigation site for impacts to wetlands (RECON 2020c). RECON reviewed a records search with a one-mile radius buffer from March 2019 for a project in a similar location. The 2019 search that was requested from the SCIC at San Diego State University identified a total of 38 cultural resources within the one-mile search radius consisting of three historic-period resources, two multi-component resources, and 33 prehistoric resources. None of these resources occur within the proposed mitigation site. The SCIC also identified the two prehistoric archaeological sites (CA-SDI-12,337 and CA-SDI-7208) described above for the project as being located immediately adjacent to the proposed mitigation site. As described above, tests of the two previously recorded prehistoric sites have consistently determined they do qualify as significant historical resources.

The field survey was conducted on August 5, 2020, by RECON archaeologist Harry J. Price, accompanied by Corel Taylor, a Native American Monitor from Red Tail Environmental. No cultural material was noted during the survey. No previously unrecorded prehistoric historical resources were found during the survey. No evidence of CA-SDI-12,337 or CA-SDI-7208 was observed during the survey; therefore, their boundaries likely do not extend into the proposed mitigation site. However, because the ground visibility was limited during the survey, and due to the number of recorded cultural resources in the vicinity, implementation of project wetland mitigation would have the potential to impact buried unknown archaeological resources. The project would implement mitigation measure MM-HIST-1 Archaeological Monitoring, as detailed in the MMRP, to monitor for the potential discovery of unknown buried archaeological resources. Implementation of this mitigation measure would reduce impacts on historic resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure HIST-1.

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

Human Health/Public Safety/Hazardous Materials

OMCPU Final PEIR

Section 5.6 of the OMCPU Final PEIR provides an analysis of health and safety/hazardous materials impacts associated with the 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 level less than significant. In addition, the OMCPU Final PEIR determined that impacts associated with aircraft hazards would be potentially significant at the program level, as future projects developed in accordance with the 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 level less than significant.

The OMCPU Final PEIR concluded that impacts associated with hazardous substances would be less than significant, as future projects within the 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 the California Department of Transportation. 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 residents as a result of transporting hazardous materials. Compliance with existing regulations would ensure impacts associated with health hazards and hazardous substances remain less than significant.

The OMCPU Final PEIR determined that impacts associated with hazardous sites would be potentially significant. 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. In addition, 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 level less than significant.

Project

The project site is located within a designated Very High Fire Hazard Severity Zone, per the City Official Very High Fire Hazard Severity Zone Map. However, the project would not construct any structures that could be subjected to wildfires, and the proposed roadway improvements have been

designed consistent with all brush management and landscaping regulations intended to reduce the risk of wildfires. Furthermore, San Diego Fire-Rescue Department Station 43 is located approximately 0.4-mile north of the northern terminus of the project site, which would provide immediate emergency response in the event of a wildfire. Therefore, the project would not expose people to substantial risk associated with wildfires, and impacts would be less than significant. Review of the Brown Field Municipal Airport ALUCP Exhibit III-2 Safety determined that the project site is located within Zone 6 Traffic Pattern Zone. Additionally, the project site is located within the Airport Influence Area - Review Areas 1 and 2 for Brown Field Municipal Airport (the boundary separating both review areas crosses the project site), and within the FAA Part 77 Notification Area for Brown Field Municipal Airport. However, the project is limited to roadway and drainage improvements and would not construct any structures that could create a hazard related to air navigation. Furthermore, a Notice of Proposed Construction will be filed with the FAA no less than 45 days prior to construction to obtain a Notice of Determination to ensure no objects related to this project present hazards to air navigation. Therefore, the project would not result in a safety hazard for people working within a designated airport influence area, and impacts would be less than significant.

The Southwestern College Higher Education Center is located approximately 0.25 mile west of the northern project terminus. Project construction may require the use of small amounts of common solvents and petroleum products. However, these materials would not be acutely hazardous, and use in small quantities would not result in a significant hazard to the public or environment. The project is limited to roadway and drainage improvements and would not construct any structures that would require the routine transport, use or disposal of hazardous materials. Therefore, the project would not result in hazardous emissions or handle acutely hazardous materials within a quarter-mile of an existing school, and impacts would be less than significant.

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

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

Hydrology and Water Quality

OMCPU Final PEIR

Section 5.7 of the OMCPU Final PEIR provides an analysis of hydrology and water quality impacts associated with the 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 mitigation framework contained in the OMCPU Final PEIR included measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual. Future projects would be

required to implement this measure and would reduce impacts associated with runoff to a level less than significant.

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

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 measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, and would reduce impacts associated with flow alteration to a level less than significant.

The OMCPU Final PEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the 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. 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 level less than significant.

Project

A site-specific Drainage Study was completed that evaluated final engineering design of the project (RICK Engineering 2020). The project would increase the amount of impervious area within the grading footprint, which would increase stormwater flows compared to the existing condition. However, the project would replace two culverts that cross beneath La Media Road at the intersection with Airway Road to improve stormwater flow through the project vicinity. The project would also introduce swales and rock gardens that would allow for stormwater detention and water quality treatment consistent with the requirements of the City's Drainage Design Manual, Storm Water Standards Manual, and Detention Criteria for Watersheds Tributary to the Mexico/U.S.A. The site-specific Drainage Study determined that proposed stormwater improvements would ensure that the project would not generate an increase in flow rates beyond existing conditions, and impacts would be less than significant.

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

Geology/Soils

OMCPU Final PEIR

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 to be 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 level less than significant.

The OMCPU Final PEIR determined that impacts associated with erosion would be potentially significant, due to the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the 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, which requires preparation of a site-specific geotechnical report to ensure that projects adhere to the Grading Regulation and National Pollutant Discharge Elimination System permit requirements. Implementation of this measure would reduce impacts associated with erosion to a level less than significant.

Project

Consistent with the OMCPU Final PEIR mitigation framework measure GEO-1 and City regulations, a site-specific Geotechnical Investigation was prepared for the project by GEOCON, Inc. (GEOCON 2016), followed by a site-specific Update Geotechnical Report (2020). Based on previous observations during mass grading in adjacent areas, recent exploratory borings and trenches, and a review of published geologic maps and reports, the Geotechnical Investigation determined that the project site is not located on any known active, potentially active, or inactive fault traces as defined by the California Geological Survey. Additionally, the Geotechnical Investigation determined that the closest known active faults were the Rose Canyon Fault zone and the Newport-Inglewood Fault Zone located over ten miles west of the project site (GEOCON 2016). Therefore, the risk associated with fault rupture is considered low. The project site is relatively flat, with elevations ranging from 466 feet above mean sea level in the southern portion of the project site, to 482 feet above mean sea level along Airway Road in the eastern portion of the project site. Therefore, the risk associated with landslides is considered low. The Geotechnical Investigation determined that risk associated with liquefaction is considered negligible due to the dense formational material encountered during

boring samples beneath the project site, lack of permanent shallow groundwater, and recommendations that were provided for remedial grading (GEOCON 2016). The subsequently prepared Update Geotechnical Report recommended that compressible surficial deposits, including topsoil and loose portions of undocumented fill present within areas where structural improvements are planned, should be removed to firm ground and properly compacted prior to placing additional fill and/or structural loads (GEOCON 2020). The Update Geotechnical Report also recommended that the upper approximately two feet of undocumented fill and Very Old Parallic Deposits would require remedial grading (GEOCON 2020). Adherence to the recommendations described above would ensure that impacts related to liquefaction, expansive soils, and subsidence would be reduced to an acceptable level of risk; therefore, impacts would be less than significant.

Based on the results of the Geotechnical Investigation and Update Geotechnical Report, the soils and geologic conditions potentially affecting the project site have been adequately addressed and determined that construction on the project site would be feasible. Additionally, the project would be required to comply with the recommended grading specifications and 2019 California Building Code recommendations presented in the Update Geotechnical Report (GEOCON 2020). Implementation of proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential impacts related to geologic hazards would be reduced to an acceptable level of risk, therefore, impacts would be less than significant.

Regarding erosion, the project would 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 approximately 9.75 miles inland from the coast, with elevations ranging from approximately 466 to 482 feet above mean sea level. Therefore, the risk of tsunami is negligible due to the distance from the ocean and elevation. There would be no risk from a seiche, as the site is not located near a large body of water, such as a lake.

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

Energy Conservation

OMCPU Final PEIR

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 (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 operation

San Diego Gas and Electric is the owner and operator of natural gas and electricity transmission and distribution infrastructure in San Diego County. The OMCPU Final PEIR concluded that impacts associated with energy conservation would be less than significant, as implementation of the 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 (Policy 4.9-4), and ensuring development integrates storm water Best Management Practices 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 OMCP policies outlined above. Impacts associated with energy use would be less than significant.

Project

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

The project is limited to widening of segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU. The project would not construct any housing or places of employment, and the widened segment of these roadway segments would serve future growth that is already anticipated in the OMCPU. Therefore, operation of the project would not result in energy consumption beyond what was anticipated in the OMCPU Final PEIR. No impact would occur.

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

Noise

OMCPU Final PEIR

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 N-3 of the General Plan. Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate 805, SR-905, SR-125, Otay Mesa Road, and Airway Road. The OMCPU Final PEIR mitigation framework included measures NOI-1 and NOI-2 that would be required by future projects to demonstrate the exterior and interior noise levels for residential uses would not exceed the compatibility standards of the City's General Plan. These measures required site-specific exterior and interior noise analyses to identify site-specific noise attenuating measures; however, even with implementation of these measures, because the effectiveness of project-level noise reduction measures cannot be known at the program level, the OMCPU Final PEIR determined that traffic noise resulting from implementation of the 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 Brown Field Municipal Airport would be considered conditionally compatible with these noise levels from operations as Brown Field Municipal Airport located 0.25-mile north of the project site and the General Abelardo L. Rodriguez International Airport located approximately 0.5-mile south of the project site in Tijuana, Mexico.

The OMCPU Final PEIR determined that impacts associated with construction noise would be potentially significant, as construction activities related to implementation of the 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 (*Polioptila californica*), raptors, and other sensitive species within the MHPA. In order to reduce potentially significant impacts associated with construction noise, the OMCPU Final PEIR mitigation framework included measures NOI-4 (and LU-2) requiring the implementation of best

construction management practices, including preparation of a project-specific Construction Noise Management Plan; however, impacts were determined to remain significant and unavoidable.

Project

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

OMCPU Final PEIR mitigation framework measures NOI-1 and NOI-2 would not apply to the project because they are related to noise exposure to residential uses and sensitive receptors. The project is limited to widening of segments of La Media Road and Airway Road and would not construct any housing or other uses associated with sensitive receptors. Additionally, there are no residential uses or sensitive receptors in the vicinity of the project site. The widened roadway segments would serve future growth that is already anticipated in the OMCPU and would not result in an increase in traffic and associated traffic-related noise. Furthermore, the widened roadways would improve traffic flow on La Media Road and Airway Road, which would decrease noise associated with vehicle congestion and idling.

Mitigation framework measure NOI-3 would not apply to the project because it is related to noise-generating commercial and industrial uses sited near noise-sensitive uses (i.e., residential). However, the project would be required to comply with the construction 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 above, ambient noise levels in Otay Mesa ranged from 61.5 to 80.9 dB(A) L_{eq} , and ambient noise levels adjacent to Airway Road were measured to be 72. 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, more than 2,000 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 50 dB(A) L_{eq} at 2,000 feet. Therefore, construction noise levels would not exceed 75 dB(A) $L_{eq(12)}$ at the fire station, and impacts would be less than significant.

Vibration

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

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

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

Paleontological Resources

OMCPU Final PEIR

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

Project

The Geotechnical Investigation determined that the project site is underlain by topsoil/undocumented fill, undocumented artificial fill, and Very Old Paralic deposits (Qvop, formally known as the Lindavista Formation). While topsoil/undocumented fill and undocumented artificial fill do not have a paleontological sensitivity rating, Very Old Paralic deposits has been assigned a moderate paleontological sensitivity rating. Project construction would excavate to depths that would reach Very Old Paralic Deposits that underlay the site. Therefore, the project would have the potential to impact paleontological resources. The project would implement mitigation measure MM-PALEO-1 Paleontological Monitoring, as detailed in the MMRP, monitor for the potential discovery of unknown buried paleontological resources. Implementation of this mitigation measure would reduce impacts on paleontological resources to a level less than significant. This mitigation measure would be consistent with OMCPU Final PEIR mitigation framework measure PALEO-1.

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

Transportation/Circulation

OMCPU Final PEIR

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 associated with capacity of the circulation system would be significant. Specifically, a total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable level of service, resulting in significant roadway segment impacts. A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition, resulting in significant intersection impacts, and 39 intersections would remain significant after mitigation. The OMCPU Final PEIR determined that all Interstate 805 freeway segments studied would be expected to operate at an acceptable level of service in the Horizon Year Plus CPU condition, while five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus

CPU condition, resulting in a significant impact at these five SR-905 freeway segments. In regard to 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 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 at roadway segments throughout the OMCPU area. Even with incorporation 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 a 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, 39 intersections would continue to be significant and unmitigated. The OMCPU Final PEIR proposed mitigations for freeway segment impacts include the construction of high-occupancy vehicle lane in each direction on the SR-905. However, because the affected freeway segments are owned and operated by the California Department of Transportation, mitigation to these segments cannot be guaranteed by the City. Therefore, Additional mitigation such as Transportation Demand Management measures may be identified in the future at the project-level; however, impacts to the SR-905 mainline segments would remain significant and unmitigated.

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

Project

The project would widen a segment of the existing two-lane La Media Road to a six-lane Primary Arterial from SR-905 to Airway Road and to a five-lane Major Arterial between Airway Road and Siempre Viva Road with three southbound lanes and two northbound lanes. The project would also

widen the segment of the existing two-lane Airway Road that crosses La Media Road to a four-lane Major. Widening of these segments of La Media Road and Airway Road would be consistent with the roadway classification in the Mobility Element of the OMCPU. The project would not construct any housing, and the widened segments of La Media Road and Airway Road would serve future growth that is already anticipated in the OMCPU. Therefore, the project would not generate any vehicle trips that were not evaluated in the OMCPU Final PEIR, and impacts related to the traffic operations would be less than significant.

The project has been designed consistent with all City safety standards for roadways, including standards for sight distance, turning radii, and speed limits to the satisfaction of the City Engineer. Therefore, the project would not result in an increase in traffic hazards for motor vehicles, bicyclists or pedestrians, and impacts would be less than significant. Similarly, the project would be consistent with the circulation network presented in the Mobility Element of the OMCPU. Therefore, the project would not create alterations to present circulation movements in the area including existing public access points, and impacts would be less than significant.

Review of Figure 3-5 of the OMCPU Mobility Element determined that a future Class II Bike Lane is proposed along both sides of the project segment of La Media Road. Additionally, a Class II Bike Lane is proposed along the northern side of the project segment of Airway Road and a Class I Bike Path is proposed along the southern side of the project segment of Airway Road. The project would introduce Class II Bike Lanes within La Media Road from SR-905 to Avenida de la Fuente, and along Airway Road. The City would complete the remaining portion of the Class II Bike Lane on La Media Road from Avenida de la Fuente to Siempre Viva Road through future roadway improvements and associated partial property acquisitions. Therefore, the project would be consistent with proposed plans regarding alternative transportation, and impacts would be less than significant.

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

Public Services

OMCPU Final PEIR

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-square-foot fire station (Fire Station No. 49) in addition to a 10,500-square-foot fire station to be collocated with the police facilities near Britannia Boulevard and Airway Road to ensure the department meets established response times, within the 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. As stated in the OMCPU Final PEIR, the average response times for Beat 713 exceed both the citywide average and police department goals for Emergency, Priority One, and Priority Two calls. Police response times would continue to increase with the buildout of CPU and the increase of traffic generated by new growth, requiring construction of new facilities. A 10,000-square-foot collocated police/fire-rescue facility is contemplated by the PFFP for the 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 proposed CPU 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 CPU would mitigate the impact associated with increased demand for schools because of the provision that the statutory fees constitute full and complete mitigation. Impacts 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 proposed CPU. Under the OMCPU, approximately 2,909 acres would be designated for parks and open space. Of this, 161 acres were designated for population-based parks. The remaining 2,748 acres would consist of open space. The construction of additional park facilities is specifically indicated in the PFFP for the 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.

Project

The project is limited to widening of segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU and associated drainage improvements. The project would not construct any structures that would require fire protection services or result in an increase in population that would require police protection,

school, park and recreation facilities, libraries, and other public services. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for future public services that were analyzed in the OMCPU Final PEIR. Therefore, the project would not require any new or altered public services and/or facilities. No impact would occur.

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

Public Utilities

OMCPU Final PEIR

Section 5.14 of the OMCPU Final PEIR evaluated potential impacts on utility services that may occur through development of the 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 WRMP and 2010 WRMP 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 OMCP 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.

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 ROW.

Project

The project is limited to widening of segment of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU. The project would not construct any structures that would require public utility services, and the widened segments of La Media Road and Airway Road would serve future growth that is already anticipated in the OMCPU. Consequently, the project would be consistent with growth projections that were utilized to forecast demand for sewer and water service that was analyzed in the OMCPU Final PEIR. Therefore, the project would not increase demand for sewer and water service within the service area that would necessitate construction of new facilities. No impact would occur.

Project construction would require 60,000 cubic yards of cut and 25,000 cubic yards of fill, resulting in a net export of 35,000 cubic yards of soil that would be recycled using the City Clean Fill Dirt Program or at the Terra Bella Nursery located in Otay Mesa West/Nestor. The project site is primarily undeveloped. Small amounts of pavement exist within the small strips of land at the parcel boundaries that would be acquired to for additional ROW requiring disposal would not affect landfill capacity. Additionally, the project would not introduce any structures that could generate solid waste during construction or operation. Therefore, impacts related to solid waste disposal would be less than significant.

As discussed under the Hydrology and Water Quality section above, the project would replace two culverts that cross beneath La Media Road at the intersection with Airway Road to improve stormwater flow through the project vicinity. The project would also introduce swales and rock gardens that would allow for stormwater detention and water quality treatment consistent with the requirements of the City's Drainage Design Manual, Storm Water Standards Manual, and Detention Criteria for Watersheds Tributary to the Mexico/U.S.A. These storm water facilities would be located within the project footprint. Therefore, potential impacts associated with construction of these storm water facilities have been evaluated throughout this EIR Addendum. The site-specific Drainage Study determined that these stormwater improvements would ensure that the project would not generate an increase in flow rates beyond what was previously identified in the Drainage Study for Metropolitan Airpark. Therefore, the project would not require the construction of new off-site stormwater facilities, and impacts would be less than significant. The project is limited to widening of segment of La Media Road and Airway Road and would not construct any structures that would require natural gas or communication services.

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

Water Supply

OMCPU Final PEIR

Section 5.15 of the OMCPU Final PEIR determined that impacts on water supply associated with buildout of the OMCPU would be less than significant. The City PUD prepared a Water Supply Assessment (WSA) for the OMCPU Final PEIR that determined sufficient water supply would be available to serve existing demands, project demands of the 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 OMCP policies regarding the use of drought-tolerant plantings for project landscape plans. The OMCPU Final PEIR concluded that adherence to these requirements would prevent excessive water usage for irrigation and other purposes, and impacts would be less than significant.

Project

The project did not meet the City's CEQA threshold that would require preparation of a WSA. 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 project would widen segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU. The project would not construct any structures that would require water service, and the widened segment of La Media Road would serve future growth that is already anticipated in the OMCPU. Therefore, the project would not increase demand for water supply beyond what was anticipated in the OMCPU. No impact would occur.

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

Population and Housing

OMCPU Final PEIR

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

Project

The project is limited to widening of segments of La Media Road and Airway Road consistent with the roadway classifications documented in the Mobility Element of the OMCPU. The project would not construct any housing, and the widened segments of La Media Road and Airway Road would serve future growth that is already anticipated in the OMCPU. Infrastructure components of the project are limited to drainage improvements at the intersection with Airway Road to address existing flooding and would not induce growth beyond what was anticipated in the OMCPU. Therefore, the project would not result in substantial population growth or growth inducement. No impact would occur.

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

Agricultural and Mineral Resources

OMCPU Final PEIR

Section 5.17 of the OMCPU Final PEIR provides an analysis of agricultural and mineral resource impacts associated with the 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. MRZ-3 mineral resources are not

considered a significant mineral resource. As such, the ability to extract mineral resources would not be impacted with the adoption of the OMCPU.

Project

Review of Figure 5.17-1 of the OMCPU Final PEIR determined that the project site consists of a mix of Farmland of Local Importance and Urban and Built Up Land. Figure 5.17-1 of the OMCPU Final PEIR identified a strip of land along the western project boundary north of in the intersection of La Media Road and Siempre Viva Road as existing farmland. However, field surveys completed in support of the Biological Technical Report determined that this segment of land is not currently in agricultural production, nor are any areas surrounding the project site designated as Farmland of Local Importance currently in agricultural production. Furthermore, the project site is not designated or zoned for agricultural production. Therefore, the project does not propose the conversion of agricultural land to non-agricultural uses, and impacts would be less than significant.

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

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

Greenhouse Gas Emissions

OMCPU Final PEIR

The OMCPU Program Final PEIR determined that impacts associated with GHG emissions and consistency with adopted plans, policies, and regulations would be significant and unmitigated at the program level as if future projects could potentially not meet the necessary reduction goals even with implementation of Mitigation Framework GHG-1. The CPU contains policies that would reduce GHG emissions from transportation and operational building uses and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

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 OMCPU Final PEIR determined that impacts associated with GHG emissions would be significant and unmitigated at the program level. Mitigation framework measure GHG-1 required that future projects implemented in accordance with the OMCP to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to business as usual (BAU), to meet Assembly Bill year 2020 target levels. However, since future projects could potentially not meet the necessary reduction goals even with implementation of mitigation framework

measure GHG-1, it was concluded that impacts would remain significant and unmitigated. The OMCP contains policies that would reduce GHG emissions from transportation and operational building uses and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the OMCPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

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

Project

Following certification of the OMCPU Final PEIR, the City adopted a Climate Action Plan (CAP) in December 2015 that outlines the actions the City will undertake to achieve its proportional share of State GHG emission reductions. 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, and revised June 2017, which is the primary document utilized by the City to ensure a project-by-project consistency with the underlying assumptions in the CAP to ensure that the specified emission reduction targets identified in the CAP are achieved. Based on the most recent CAP Annual Report, total GHG emissions in 2018 were 24 percent below the 2010 baseline (City of San Diego 2019).

The OMCPU Final PEIR Identified various policies and recommendations aimed to reduce GHG emissions 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 OMCPs, the project would be required to comply with the CAP Consistency Checklist. By implementing the measures outlined in the CAP Consistency Checklist, the project would meet the goals and strategies of the CAP.

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

would result in an increased density within a Transit Priority Area. The City's Engineering and Capital Projects Department prepared a CAP Consistency Checklist for the project (City of San Diego 2020), and its consistency is presented below.

Completion of Step 1: Land Use Consistency of the CAP Consistency Checklist determined that the project would be consistent with the existing land use and zoning designations within the General Plan and Community Plan. The widened segments of La Media Road and Airway Road would be consistent with the roadway classifications documented in the Mobility Element of the OMCPU. Therefore, the project would be consistent with the growth projections used in the development of the CAP per Step 1(A).

Step 2: CAP Strategies Consistency of the CAP Consistency Checklist applies to development projects that involve permits that would require a certificate of occupancy from the Building Official or projects comprised of one- and two-family dwellings or townhouses as defined in the California Residential Code and their accessory structures. The project does not meet this criterion as no habitable structures are proposed; therefore, Step 2 measures would not apply.

Step 3: Project CAP Conformance Evaluation would only apply if Step 1 is answered in the affirmative under Option B. As previously disclosed above, the project is consistent with the General Plan and community plan and therefore answered in the affirmative to 1A. Thus, Step 3 does not apply to the project.

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

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

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

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

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

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

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

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

A. GENERAL REQUIREMENTS – PART I Plan Check

1. Prior to Notice to Proceed (NTP) Award 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, specifications, details, etc.) to ensure MMRP requirements have been incorporated.
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: <https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (prior to start of construction)

- 1. PRE-CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The Applicant Department 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 as necessary: **Qualified Biologist and Paleontologist**

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

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division**
858-627-3200
 - b) For clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**
- 2. MMRP COMPLIANCE:** This project, Project Tracking System (PTS) No. 667298, or for subsequent future projects the associated PTS No. 667298 shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's ED, 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, and methodology, etc).
- Note: The Applicant Department'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 that any other agency requirements or permits have been obtained or are in process 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 as applicable:
- California Department Fish and Wildlife: 1602 Streambed Alteration Agreement
 - Regional Water Quality Control Board: 401 State Water Quality Certification
 - United States Army Corp of Engineers: Section 404 Permit
- 4. MONITORING EXHIBITS:** All consultants are required to submit to RE and MMC, a monitoring exhibit on a 11 x 17 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 indicated 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.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Applicant Department'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
Historical Resources	Historical Report	Historical Site Observations
Paleontology	Paleontology Reports	Paleontology Site Observation
Paleontological Resources	Paleontology Reports	Paleontology Site Observation

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIOLOGICAL RESOURCES

MM-BIO-1: Biological Resources – Protection During Construction

Prior to issuance of Notice To Proceed (NTP), the Development Services Department (DSD) Environmental Designee (ED) shall review and approve all construction documents (plans, specifications, details, etc.) to ensure these MMRP requirements are incorporated.

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City's Biological Guidelines (2012), has been retained to implement the proposed project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the proposed 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 submittal of 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. **Biological Construction Monitoring Exhibit:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, the BCME shall include the following: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Administrator Deputy Director (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 California horned lark and Western Burrowing Owl, 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 the California horned lark and Western Burrowing Owl 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 California horned lark and Western Burrowing Owl are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.
- F. **Resource Delineation** - Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting California horned lark and Western Burrowing Owl) 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 the approved

construction area and to protect sensitive flora and fauna (e.g., 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 the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the first day of monitoring, the first 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 on-site (e.g., flag plant specimens for avoidance during access, etc.). If active nests for California horned lark and Western Burrowing Owl or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post-construction

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

MM-BIO-2: Biological Resources – Sensitive Vegetation Communities

UPLANDS: Prior to the issuance of a Notice to Proceed, the Applicant Department shall mitigate Impacts to Diegan coastal sage scrub and non-native grassland in accordance with the ratios set forth in the Biology Guidelines (Biology 2018). Accordingly, the Applicant Department shall mitigate for project impacts to 0.43-acre of Tier II habitat (Diegan coastal sage scrub) at a 1:1 mitigation ratio. The Applicant Department shall mitigate for project impacts to 3.15-acres of impacts to Tier IIIB (Non-Native Grassland) located outside of the MHPA at a 0.5:1 ratio inside the MHPA and shall mitigate for project impacts to 1.20-acres of impacts to Tier IIIB (Non-Native Grassland) located inside of the MHPA at a 1:1 ratio inside the MHPA. All mitigation shall occur inside of the MHPA as detailed in MMRP Table.

- Mitigation to offset impacts to both Tier II and IIIB vegetation communities would occur through restoration and preservation of 6.666 acres of maritime succulent scrub at the vernal pool mitigation site.

JURISDICTIONAL WETLAND: Prior to the issuance of a Notice to Proceed, the Applicant Department shall mitigate Impacts to freshwater marsh, emergent wetland, mule fat scrub, and southern willow scrub in accordance with the ratios set forth in Table 2A of the Biology Guidelines (Biology 2018). Accordingly, the Applicant Department shall mitigate for project impacts to 0.69-acre of freshwater marsh at a 2:1 mitigation ratio, impacts to 0.61-acre of emergent wetland at a 2:1 mitigation ratio, impacts to 0.01 acre of mulefat at a 2:1 mitigation ratio, and impacts to 0.28-acre of southern willow scrub at a 2:1 mitigation ratio. Required mitigation shall be achieved as detailed in MMRP Table. A total of 3.48-acres of jurisdictional wetland mitigation shall be completed in accordance with the Wetland Mitigation Plan for the La Media Road Widening Project (RECON 2021c).

VERNAL POOLS: Prior to the issuance of a Notice to Proceed, the Applicant Department shall mitigate Impacts to three vernal pools in accordance with the ratios set forth in Table 2A of the City's Biology Guidelines (Biology 2018) and Vernal Pool Habitat Conservation Plan. Accordingly, the Applicant Department shall mitigate for project impacts to 0.15-acre of at a 2:1 mitigation ratio as detailed in MMRP Table. A total of 0.30-acre of vernal pool mitigation shall be completed in accordance with Vernal Pool Mitigation Plan for the La Media Road Widening and Fire-Rescue Air Ops Phase II Project (RECON 2021b).

MM-BIO-3: Biological Resources – San Diego Fairy Shrimp

The ponded basin in which San Diego fairy shrimp have been detected would be avoided by the project. However, as updated fairy shrimp surveys were not conducted, the vernal pools within the survey area are considered occupied. Thus, the impacts to vernal pools are also assumed to impact San Diego fairy shrimp. Per the City's Biology Guidelines (City of San Diego 2018), impacts to San Diego fairy shrimp would be mitigated through inoculation of restored and/or enhanced pools at the vernal pool mitigation site located on eight one-acre City-owned parcels within the MHPA in western Otay Mesa (RECON 2021b). Due to the presence of the non-native versatile fairy shrimp, salvaged topsoil would not be sourced from the impacted pools on site.

MM-BIO-4: VPHCP General Conditions for Compensatory Mitigation

Biological Resources – Revegetation/Restoration/Mitigation Plan

Prior to the issuance of a Notice to Proceed (NTP)/Bid Award the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statement is shown on the grading and/or construction plans as a note under the heading *Environmental Requirements*: La Media Road Improvement Project is subject to Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the Biological Resources Report.

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to NTP/Bid Award, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including mitigation of direct impacts to 0.15 acre of vernal pools (three pools total) have been shown and noted on the appropriate landscape construction documents. The

landscape construction documents and specifications must be found to be in conformance with the Vernal Pool Mitigation Plan for the La Media Road Widening & Fire-Rescue Air Operations Phase II Project (RECON 2021b) and Wetland Mitigation Plan for the La Media Road Widening Project (RECON 2021c), the requirements of which are summarized below.

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (July 2018). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:
 - a. The RMC shall be responsible for the maintenance of the vernal pool mitigation area for a minimum period of 120 days. Maintenance visits shall be conducted on a *weekly* basis throughout the plant establishment period.
 - b. At the end of the 120-day period the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
 - c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.

- d. Existing indigenous/native species shall not be pruned, thinned or cleared in the revegetation/mitigation area.
 - e. The revegetation site shall not be fertilized.
 - f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.
 - g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.
 - h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.
4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone and notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.

C. Letters of Qualification Have Been Submitted to ADD

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

Prior to Start of Construction

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

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

During Construction

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

1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, cleaning, grading, excavation, landscape establishment in association with grading, road widening, and stormwater flow improvements which could result in impacts to sensitive biological resources as identified in the LCD and on the RRME. **The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible to notify the CM, LA, RE, BI and MMC of the changes.**
2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVr). The CSVr's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
3. The PQB or QBM shall be responsible for maintaining and submitting the CSVr at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that of associated with biology).
4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats, including vernal pools, freshwater marsh, emergent wetland, mule fat scrub, southern willow scrub, Diegan coastal sage scrub, non-native grassland (including western burrowing owl foraging habitat), as shown on the approved LCD.
6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly
7. The PQB or QBM shall oversee implementation of BMPs, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMPs upon completion of construction activities. Removal of temporary construction BMPs shall be verified in writing on the final construction phase CSVr.
8. PQB shall verify in writing on the CSVr's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These

activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.

9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

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

C. Determination of Significance

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

Post Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period
 - a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
 - b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
 - c. Maintenance activities will include all items described in the LCD.

- d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).

2. Five-Year Biological Monitoring

- a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
- b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
- c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
- d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
- e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and percent cover of non-native/noninvasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.
- f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth-year criteria and the irrigation has been terminated for a period of the last two years.
- g. The PQB or QBM shall oversee implementation of post-construction BMPs, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMPs upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

B. Submittal of Draft Monitoring Report

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

C. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
 - a. This report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years.
 - b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.
 - c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall

take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-BIO-5: Biological Resources – Western Burrowing Owl Preconstruction Avoidance Measures

Prior to issuance of Notice To Proceed (NTP)/Bid Award, the Development Services Department (DSD) Environmental Designee (ED) shall review and approve all construction documents (plans, specifications, details, etc.) to ensure these MMRP requirements are incorporated.

Preconstruction Survey Element

1. Prior to Permit or Notice to Proceed Issuance:

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

2. Prior to Start of Construction:

- A. The Applicant Department and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the project site; regardless of the time of the year. "Site" means the project site and the area within a radius of 450 feet of the project site. The report shall be submitted and approved by the Wildlife Agencies and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and BUOW locations on aerial photos.
- B. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report - Appendix D.
- C. Twenty-four 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 BUOW are present in areas not previously identified, immediate notification to the City and WA's shall be provided prior to ground disturbing activities.

During Construction:

1. **Best Management Practices shall be employed** as BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are BUOW occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.
2. **Ongoing BUOW Detection** - If BUOWs or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "B" shall be followed. Neither the MSCP nor this report allows for any BUOWs to be injured or killed outside or within the MHPA; in addition, impacts to BUOWs within the MHPA must be avoided.

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

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

- 1) This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – all direct and indirect impacts to BUOWs within the MHPA shall be avoided.
- 2) If one or more BUOWs are using any burrows (including pipes, culverts, debris piles etc.) on or within 300 feet of the proposed construction area, the City's MMC and MSCP Sections shall be contacted. The City's MSCP and MMC Section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist appropriate City biologist for on-going coordination with the Wildlife Agencies and the qualified consulting BUOW biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.
 - a) **Outside the Breeding Season** - If the BUOW is using a burrow on site outside the breeding season (i.e. September 1 – January 31), the BUOW may be evicted after the qualified BUOW biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
 - b) **During Breeding Season** - If a BUOW is using a burrow on-site during the breeding season (Feb 1-Aug 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the BUOWs can be evicted. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix E (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.
3. **Survey Reporting During Construction** - Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's MMC, and MSCP Sections and the Wildlife Agencies and must be provided in writing (as by e-mail) and acknowledged to have been received by the required Agencies and DSD Staff member(s).

Post Construction:

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

MM-BIO-6: Biological Resources – Occupied Western Burrowing Owl Habitat

The project would cause permanent and temporary impacts to non-native grassland considered occupied by western burrowing owl. The City's Biology Guidelines state that "mitigation for impacts to occupied burrowing owl habitat must be through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management and enhancement of burrowing owl nesting and foraging requirements" (City of San Diego 2018). Similarly, the Staff Report on Burrowing Owl Mitigation states that "mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat areas for breeding, foraging, wintering, [and] dispersal..." (CDFW 2012). Mitigation to meet these requirements would occur at the on-site wetland mitigation site, in accordance with the Wetland Mitigation Plan for the La Media Road Widening Project (RECON 2021c). The upland areas surrounding the vernal pools would be restored and enhanced to support burrowing owl habitat.

MM-BIO-7: USACE, CDFW, and RWQCB Wetlands and Waters

Impacts to jurisdictional waters would require permit authorizations from the USACE through the Section 404 Permit Program, from the CDFW through a 1602 Streambed Alteration Agreement, and from the RWQCB through a 401 State Water Quality Certification. It is anticipated that the project would be permitted through a USACE Nationwide Permit. Compensatory mitigation for impacts to jurisdictional waters would be addressed in a mitigation plan to be submitted for approval with the permit application packages.

Impacts to jurisdictional waters would require in-kind mitigation, including a minimum 1:1 creation element, with the remainder consisting of habitat creation, enhancement, or preservation, such that the project achieves no-net-loss of jurisdictional waters. Mitigation would occur at ratios consistent with Table 2A of the City's Biology Guidelines at a wetland mitigation site located within the MHPA immediately adjacent to the project footprint south of Airway Road and west of La Media Road. Anticipated mitigation is presented below in Table 7. Any additional mitigation achieved on the wetland mitigation site not needed for this project will be available for future City projects.

Table 7 Mitigation for Impacts to Jurisdictional Resources ^a					
Jurisdictional Areas	Impact			Mitigation ^b	
	Permanent	Temporary	Total	Ratio	Acreage
USACE Jurisdictional Areas (404)					
Wetland Waters of the U.S.	1.51	0.22	1.73	2:1	3.46
CDFW Jurisdictional Areas (1602)					
Wetland Waters of the state	1.52	0.22	1.74	2:1	3.48
RWQCB Jurisdictional Areas (401)					
Wetland Waters of the state ^d	1.52	0.22	1.74	2:1	3.48
^a All areas are presented in acres rounded to the nearest 0.01.					
^b Mitigation would occur in-kind with a minimum 1:1 creation component, and the remainder consisting of restoration or enhancement. Mitigation ratio assumes mitigation site would occur within the same watershed. Final mitigation ratios will be determined in consultation with USACE, RWQCB, and CDFW.					

MM-BIO-8: City Wetlands

The project would result in 1.52 acres of permanent impacts and 0.22 acre of temporary impacts to City wetlands. Impacts to City wetlands would qualify for a deviation from the ESL wetland regulations under the Essential Public Projects Option. The vegetation communities within the survey area that are considered City wetlands include vernal pools with indicator plants, freshwater marsh, emergent wetland, mule fat scrub, and southern willow scrub. As required per Table 2A of the City's Biology Guidelines, each of these would require mitigation at a ratio of 2:1, for a total of 3.48 acres of mitigation. Impacts to vernal pools would be mitigated with creation, restoration, and enhancement as described in the vernal pool mitigation plan (RECON 2021b), and impacts to freshwater marsh, emergent wetland, mule fat scrub, and southern willow scrub would be mitigated with creation, restoration, and enhancement as described in the wetland mitigation plan (RECON 2021c).

HISTORICAL RESOURCES

MM-HIST-1: Archaeological Monitoring

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the 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 Hazardous Waste Operations and Emergency Response 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 CM 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 Occupational Safety and Health Administration 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 (CSV). The CSV'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 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 surface disturbance, THEN,
 - c. In order 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 on the site;
 - (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.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional

conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

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 CSV and submit to MMC via fax by 8AM of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.

- d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.**
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 4. MMC shall provide written verification to the PI of the approved report.
 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

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

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

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

PALEONTOLOGICAL RESOURCES

MM-PALEO-1: Paleontological Monitoring

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check

1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for

Paleontological Monitoring have been noted on the appropriate construction documents.

- B. Letters of Qualification have been submitted to ADD
- 1. Prior to Bid Award, the applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
- 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
- 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

- 1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

- 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
- 2. Acknowledgement of Responsibility for Curation (CIP or Other Public Projects)

The applicant shall submit a letter to MMC acknowledging their responsibility for the cost of curation associated with all phases of the paleontological monitoring program.

- 3. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC for approval identifying the areas to be monitored including the delineation of grading/excavation limits. Monitoring shall begin at depths below 10 feet from existing grade or as determined by the PI in consultation with MMC. The determination shall be based on site specific records search data which supports monitoring at depths less than ten feet.
 - b. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 - c. MMC shall notify the PI that the PME has been approved.
4. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.
5. Approval of PME and Construction Schedule

After approval of the PME by MMC, the PI shall submit to MMC written authorization of the PME and Construction Schedule from the CM.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 1. The monitor shall be present full-time during grading/excavation/trenching activities including, but not limited to mainline, laterals, jacking and receiving pits, services and all other appurtenances associated with underground utilities as identified on the PME that could result in impacts to formations with high and/or moderate resource sensitivity.
The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.
 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

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

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval of the program from MMC, MC and/or RE. PRP and any mitigation must be approved by MMC, RE and/or CM before ground disturbing activities in the area of discovery will be allowed to resume.
 - (1). Note: For pipeline trenching projects only, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under "D."
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
 - (1). Note: For Pipeline Trenching Projects Only. If the fossil discovery is limited in size, both in length and depth; the information value is limited and there are no unique fossil features associated with the discovery area, then the discovery should be considered not significant.

- (2). Note, for Pipeline Trenching Projects Only: If significance cannot be determined, the Final Monitoring Report and Site Record shall identify the discovery as Potentially Significant.

D. Discovery Process for Significant Resources - Pipeline Trenching Projects

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance.

1. Procedures for documentation, curation and reporting
 - a. One hundred percent of the fossil resources within the trench alignment and width shall be documented in-situ photographically, drawn in plan view (trench and profiles of side walls), recovered from the trench and photographed after cleaning, then analyzed and curated consistent with Society of Invertebrate Paleontology Standards. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact and so documented.
 - b. The PI shall prepare a Draft Monitoring Report and submit to MMC via the RE as indicated in Section VI-A.
 - c. The PI shall be responsible for recording (on the appropriate forms for the San Diego Natural History Museum) the resource(s) encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines. The forms shall be submitted to the San Diego Natural History Museum and included in the Final Monitoring Report.
 - d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVr and submit to MMC via the RE via fax by 8AM on the next business day.

b. Discoveries

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

c. Potentially Significant Discoveries

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

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

B. If night 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.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

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

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

b. Recording Sites with the San Diego Natural History Museum

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

2. MMC shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC via the RE for approval.

4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

C. Curation of artifacts: Deed of Gift and Acceptance Verification

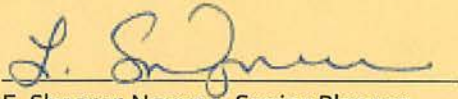
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall submit the Deed of Gift and catalogue record(s) to the RE or BI, as appropriate for donor signature with a copy submitted to MMC.
3. The RE or BI, as appropriate shall obtain signature on the Deed of Gift and shall return to PI with copy submitted to MMC.
4. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

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

IX. CERTIFICATION

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



E. Shearer-Nguyen, Senior Planner
Development Services Department

March 29, 2021

Date of Final Report

Attachments:

Figure 1: Regional Location

Figure 2: Project Location on Aerial Photograph

Figure 3: Site Plan

X. REFERENCES

Busby Biological Services

- 2015 Focused, Protocol-Level Wet Season Fairy Shrimp Survey Summary Report for the La Media Road Improvements Project, City of San Diego, San Diego County, California. September 29.

California Department of Transportation (Caltrans)

- 2013 Technical Noise Supplement. November.

ECORP Consulting, Inc.

- 2018 La Media Road Data Submittal – Burrowing Owl and Rare Plant. Review Draft. June 5.

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- 2015 Metropolitan Airpark Project Burrowing Owl Mitigation Plan. May 18.

GEOCON, Inc. (GECON)

- 2016 Metropolitan Airpark Phases 1a and 1b Off-Site Roadway Improvements. December 21.
- 2020 Update Geotechnical Report, La Media Road and Truck Route Improvements. May 8, Revised October 19.

RECON Environmental, Inc. (RECON)

- 2019 Western Burrowing Owl Focused Survey Results for the La Media Road Widening Project. August 30.
- 2020a Road Construction Emissions Model Output. October 22.
- 2020b Results of the Historical Resources Survey of the La Media Road Improvement Project. October 23.
- 2020c Results of the Historical Resources Survey of the Wetland Mitigation Area for the La Media Road Improvement Project. October 23.
- 2021a Biological Technical Report for the La Media Road Improvement Project. February 25.
- 2021b Vernal Pool Mitigation Plan for the La Media Road Widening & Fire-Rescue Air Operations Phase II Project San Diego, California. February 25.
- 2021c Wetland Mitigation Plan for the La Media Road Widening Project San Diego, California. February 25.

RICK Engineering

- 2020 Drainage Study for Grading Improvement Plans for La Media Road and Airway Road. Revised February 21.

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- 2018 Road Construction Emissions Model, Version 9.0.

San Diego, City of

- 2017 Final City of San Diego Vernal Pool Habitat Conservation Plan. October.
- 2018 San Diego Municipal Code. Land Development Manual. Biology Guidelines. Adopted September 28, 1999. Amended February.
- 2019 2019 Annual Report, Climate Action Plan. Available at https://www.sandiego.gov/sites/default/files/2019_cap_digital_version.pdf.
- 2020 Climate Action Plan Consistency Checklist. Prepared by Engineering and Capital Projects Department

U.S. Army Corps of Engineers (USACE)

- 1987 Corps of Engineers Wetlands Delineation Manual. Wetlands Research Program, Technical Report Y-87-1. Department of the Army, Washington, DC.
- 2008a A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States. August.
- 2008b Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region. Prepared by U.S. Army Engineer Research and Development Center. September.



Regional Location

La Media Road Improvement/Project No. 667298

City of San Diego – Development Services Department

FIGURE
No. 1



Project Location on Aerial Photograph

La Media Road Improvement/Project No. 667298
City of San Diego – Development Services Department

FIGURE
No. 2



LA MEDIA ROAD ROADWAY IMPROVEMENTS



Site Plan

La Media Road Improvement/667298

City of San Diego - Development Services Department

**FIGURE
No. 3**