City of San Diego
Development Services

Advance Planning &
Engineering Division
(619) 446-5460

FINAL
ENVIRONMENTAL IMPACT REPORT

Project No. 30330/304032
SCH No. 2004651076

SUBJECT: **CITY COUNCIL APPROVAL of a updated Otay Mesa Community Plan, General Plan Amendment**, R**escission of Otay Mesa Development District (OMDD) and Adoption of a Rezone ordinance (to replace the OMDD with citywide zoning and creation of two (2) new Community Plan Implementation Overlay Zones), approval of the Public Facilities Financing Plan (PFFP), and amendments to the City's Land Development Code (LDC) as further described below**. The Otay Mesa Community Plan Update (CPU) is a comprehensive update of the 1981 community plan. Approval of the CPU would establish land use designations and policies to guide future development consistent with the City's General Plan (2008). The CPU is intended to implement the General Plan policies through the provision of community-specific recommendations. The concurrent rezone would rescind the existing OMDD and implement development regulations consistent with citywide zoning classifications. Amendments to the City's LDC are required to create new and revised implementing zones, including two new Community Plan Implementation Overlay Zones (CPIOZ Type A and Type B) for proposed commercial and industrial land use designations under the CPU and for the creation of new zones to implement the new International Business and Trade (IBT 1-1) and Business Park Residential Permitted (~~BRT~~BPRP) land use designations. An updated PFFP would be adopted with the CPU to allow for implementation of the CPU. The CPU would additionally serve as the basis for guiding a variety of other actions, such as parkland acquisitions, transportation improvements and public facilities. The update includes modifications to the various elements of the Plan to incorporate current planning policies and practices in the City of San Diego, as well as to make the Plan reflective of the substantial land use changes (e.g., adopted alignments of SR-905 and SR-125) that have occurred over the last twenty-five years. The Otay Mesa community encompasses approximately 9,300 acres in the southeastern portion of the City of San Diego. The community is bordered by the San Ysidro and Otay Mesa-Nestor communities on the west, the City of Chula Vista and the Otay Valley Regional Park on the north, the County of San Diego on the east and the US/Mexico border and the City of Tijuana on the south.

APPLICANT: City of San Diego - Planning, Neighborhoods and Economic Development Department

The community plan update project components include:

1. **City of San Diego General Plan Amendment**. Adoption of the CPU constitutes an amendment to the Land Use Element of the General Plan.

2. **Rescission of the Otay Mesa Development District (OMDD) and Adoption of a Rezone Ordinance (to replace the OMDD with citywide zoning) to citywide zones contained in**

the Land Development Code (LDC). The concurrent rezone would rescind the existing OMDD and make development regulations consistent with citywide zoning classifications.

3. **Other Land Development Code Amendments.** Amendments to the City's LDC are required to create new and revised implementing zones, including two new Community Plan Implementation Overlay Zones (CPIOZ Type A and Type B) for proposed commercial and industrial land use designations under the CPU and the creation of new zones to implement the new International Business and Trade (IBT 1-1) and Business Park Residential Permitted (~~BRT~~ BPRP) land use designations.

4. **Otay Mesa Community Plan Public Facilities Financing Plan (PFFP) Update.** The PFFP includes the community's boundary, a development forecast and analysis, a capital improvement program, and an updated fee schedule. Both Facilities Benefit Assessments (FBAs) and Development Impact Fees (DIFs) provide funding sources for public facilities projects in Otay Mesa. An updated PFFP would be adopted with the CPU to allow for implementation of the CPU.

The updated Otay Mesa Community Plan would provide a long-range, comprehensive policy framework for growth and development in Otay Mesa over the next 20 to 30 years. Guided by citywide policy direction contained within the General Plan (adopted by the City Council on March 8, 2008), the updated community plan will identify 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, as well as other enhancements to the existing planning area. The Otay Mesa Community Plan Update (Project) will be consistent with and implement the City's General Plan and will include the following ~~8~~ 9 elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Historic Preservation; and Noise. In conformance with CEQA Section 15152, the environmental analyses for the draft PEIR would "tier" from the General Plan Final PEIR (Project No. 104495/ SCH No. 2006091032) and will incorporate by reference the general discussions disclosed in this certified environmental document.

The CPU contemplates land use designations that support a fully integrated circulation system which includes, but is not limited to, high frequency transit and/or public transportation. Circulation changes (i.e., roadway deletions, reclassifications, and alignment modifications) would involve primarily Siempre Viva Road, Beyer Boulevard, Otay Mesa Road, Old Otay Mesa Road, Airway Road, Heritage Road (north and south of SR-905), Cactus Road, Britannia Road, La Media Road, Otay Valley Road, and Lonestar Road. Moreover, the CPU takes into account the alignment for the recently opened SR-905, which is different from that assumed in the existing community plan.

The CPU would re-designate land uses to increase the number of allowed residential units and reduce the acreage for industrial uses. New land use designations are proposed to allow the establishment of industrial centers, mixed commercial and residential uses, and, where appropriate, residential uses near industrial uses. Modified industrial and commercial land use designations also are included that are similar to the industrial intensity found in the

adopted community plan. The International Business and Trade (IBT) would be the dominant industrial land use designation. Other features of the CPU include:

- Increasing housing unit yield in the southwestern residential areas
- Creating a village center in an area south of SR-905 and west of Britannia Boulevard
- Designating a corridor of Business Park industrial uses along SR-905
- Seeking to enhance the image of the community along SR-905 with flex space and corporate office users flanking the freeway
- Encouraging outdoor storage and heavy industry uses to shift to the border area

UPDATE 12/18/2013:
Revisions and clarifications have been made to the Final Environmental Impact Report (EIR) when compared to the Draft EIR to address comments received during public review, and to correct text, tables and figures in various sections. These revisions are indicated by ~~strikeout~~ and underline format. Correction of typographical errors, minor edits and other non-substantive revisions which have been made throughout the document are not shown in ~~strikeout~~ and underline format. A copy of the Final EIR showing all ~~strikeout~~ and underline text will be available for inspection in the office of the Development Services Department upon request.

In accordance with California Environmental Quality Act (CEQA) Section 15088.5 the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impacts or with the addition of a new mitigation measure required to avoid a significant environmental impact.

CONCLUSIONS:

Based on the analysis conducted for the project described in the subject block above, the City has prepared the following Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) to inform public agency decision-makers and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines Section 15121). As further described in the attached EIR, the City has determined that the project would have a significant environmental effect in the following areas(s): **Land Use, Air Quality, Biological Resources, Transportation/Circulation, Geology/Soils, Historical Resources, Hydrology/Water Quality, Paleontological Resources, Human Health/Public Safety/Hazardous Materials, Noise, Utilities, and Greenhouse Gas Emissions.**

With the exception of impacts related to **Air Quality (~~RAQS~~ Criteria Pollutants, Stationary Sources/Collocation), Transportation/Circulation, Noise (Traffic/Stationary Sources and Construction), Utilities (Solid Waste), and Greenhouse Gas Emissions**, mitigation measures are proposed (Chapter 11) that would reduce Project impacts to below a level of significance. The attached Environmental Impact Report and Technical Appendices document the reasons to support the above Determination.

MITIGATION, MONITORING AND REPORTING PROGRAM:

A series of mitigation measures are identified within each issue area discussion in the EIR to reduce environmental impacts. The mitigation measures are fully contained in Chapter 11 of the EIR.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS

Based on the requirement that alternatives reduce significant impacts associated with the proposed project, the EIR considers the following Project Alternatives which are further detailed in the Executive Summary and Chapter ~~8~~ 10 of the EIR:

1. No Project
2. Reduced Biological Impacts Alternative
3. Reduced Density Alternative

Under CEQA Guideline Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The EIR identified Alternative 2 as the environmentally superior alternative because it would meet the Project objectives while further reducing and avoiding biological, historical (archaeological) and paleontological impacts when compared to the Project.

PUBLIC REVIEW DISTRIBUTION:

Individuals, organizations, and agencies that received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency is provided below. Copies of the Final EIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the office of the Advanced Planning & Engineering Division, or purchased for the cost of reproduction.

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the Draft Environmental Impact Report (EIR). No response is necessary and the letters are attached at the end of the EIR.

(X) Comments addressing the accuracy or completeness of the Draft Environmental Impact Report (EIR) were received during the public input period. The letters and responses are located immediately after the EIR Distribution List.

Cathy Winterrowd, Interim Deputy Director
Development Services Department

September 10, 2013
Date of Draft Report

Analyst: Myra Herrmann

December 18, 2013
Date of Final Report

DISTRIBUTION OF DRAFT ENVIRONMENTAL IMPACT REPORT:

Copies of the Draft EIR were distributed to the following individuals, organizations, and agencies:

U.S. GOVERNMENT
Federal Aviation Administration (1)
Department of Transportation, Region 9 (2)
Naval Facilities Engineering Command Southwest, Karen Ringel-Director of Real Estate (8)
Naval Facilities Engineering Command Southwest (12)
Army Corps of Engineers (16 & 26)
Environmental Protection Agency (19)
Border Patrol (22)
U. S. Fish and Wildlife Service (23)
USDA Natural Resources Conservation Services (25)

STATE OF CALIFORNIA
State Clearinghouse (46A)
Caltrans Planning, District 11 (31)
Department of Fish and Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
Housing & Community Development (38)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
California Air Resources Board (49)
Office of the Attorney General (50)
Caltrans –Division of Aeronautics (51B)
California Transportation Commission (51A)
Native American Heritage Commission (56)
Office of Planning & Research (57)
Highway Patrol (58)
California Energy Commission – Eileen Allen (59)
Department of Conservation (61)
State Lands Commission (62)

COUNTY OF SAN DIEGO
Air Pollution Control District (65)
Planning and Land Use (68)
Department of Parks and Recreation (69)
Department of Public Works (72)
Water Authority (73)
Hazardous Materials Management Division (75)
Department of Environmental Health – Land and Water Quality Division (76)
Chuck Tucker (232)

CITY OF SAN DIEGO

Mayor's Office (91)
- Interim Mayor, Todd Gloria
- Walt Ekard – Interim Chief Operating Officer
- Scott Chadwick – Assistant Chief Operating Officer Council District 3

Council President Pro Tem Sherri Lightner, District 1
Councilmember Kevin Faulconer, District 2
Council District 3
Councilmember Myrtle Cole, District 4
Councilmember Mark Kersey, District 5
Councilmember Lorie Zapf, District 6
Councilmember Scott Sherman, District 7
Councilmember David Alvarez, District 8
Councilmember Marti Emerald, District 9
Office of the City Attorney – Shannon Thomas
Development Services Department
- Tom Tomlinson, Interim Director
- Cathy Winterrowd, Interim Deputy Director
- Myra Herrmann, Senior Planner - Environmental
- Gary Geiler
- Ann Gonsalves
- Jim Lundquist
- Frank January, Facilities Financing
- Patrick Thomas
- Mehdi Rastakhiz
- Leonard Wilson
- Don Weston

Planning & Neighborhood Restoration Department
- Bill Fulton, Director
- Nancy Bragado, Interim Deputy Director
- Theresa Millette, Senior Planner – Project Manager
- Jeanne Krosch
- Tait Galloway
- Kelley Stanco
- Howard Greenstein
- Maureen Gardiner

Real Estate Assets Department
- James Barwick
- Roy Nail
- Michael Tussey

Park & Recreation Department - Open Space Division
- Chris Zirkle
- Laura Ball

Public Works Department - Engineering and Capital Projects
- Kerry Santoro

Transportation & Storm Water Department
Kris McFadden
Drew Kleis
Ruth Kolb
Linda Marabian
Public Utilities Department
Anne Sasaki
Nicole McGinnis
Fire and Life Safety Services
Larry Trame
Michelle Abella-Shon
Police Department
Kevin Mayer
Library Department – Government Documents (81)
Environmental Services Library (81J)
Otay Mesa-Nestor Branch Library (81W)
San Ysidro Branch Library (81EE)
Historical Resources Board (87)
Lisa Wood - Environmental Services Department (93A)
Wetland Advisory Board (91A/MS 908A)

OTHER AGENCIES
City of Chula Vista (94)
San Diego Association of Governments (108)
San Diego County Regional Airport Authority (110)
San Diego Transit Corporation (112)
San Diego Gas & Electric (114)
Chula Vista School District (118)
San Diego Unified School District (125)
San Ysidro Unified School District (127)
San Diego City Schools (132)
San Diego Community College District (133)
Sweetwater Union High School District
Otay Water District – Robert Scholl

ENVIRONMENTAL/BIOLOGICAL ORGANIZATIONS
Sierra Club, San Diego Chapter (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
Environmental Heath Coalition (169)
California Native Plant Society (170)
San Diego Coast & Baykeeper (173)
Ellen Bauder (175)
EC Allison Research Center (181)
Endangered Habitats League (182/182A)
Vernal Pool Society (185)

HISTORICAL AND ARCHAEOLOGICAL ASSOCIATIONS

South Coastal Information Center (210)
San Diego History Center (211)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
San Diego County Archaeological Society (218)

TRIBAL DISTRIBUTION

Carmen Lucas (206)
Ron Christman (215)
Clint Linton (215B)
Frank Brown (216)
Campo Band of Mission Indians (217)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution – Public Notice Only (225A-S)
- Barona Group of Capitan Grande Band of Mission Indians
- Campo Band of Mission Indians
- Ewiiaapaayp Band of Mission Indians
- Inaja Band of Mission Indians
- Jamul Indian Village
- La Posta Band of Mission Indians
- Manzanita Band of Mission Indians
- Sycuan Band of Mission Indians
- Viejas Group of Capitan Grande Band of Mission Indians
- Mesa Grande Band of Mission Indians
- San Pasqual Band of Mission Indians
- Ipai Nation of Santa Ysabel
- La Jolla Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Mission Indians
- Pechanga Band of Mission Indians
- Rincon Band of Luiseno Indians
- San Luis Rey Band of Luiseno Indians
- Los Coyotes Band of Mission Indians

CIVIC/PLANNING ORGANIZATIONS

Citizen's Coordinate for Century III (179)
San Diego Chamber of Commerce (157)
Building Industry Association (158)
Convis (159)
Local 30 (191)
League of Women Voters (192)
Industrial Environmental Association – Jack Monger
Otay Valley Regional Park CAC (227)
Otay Mesa Nestor Planning Committee (228)
Otay Mesa Chamber of Commerce (231A)

OVRP – San Diego County Parks (232)
Marilyn Ponseggi –City of Chula Vista, Planning Department (234)
Otay Mesa Planning Committee (235)
San Ysidro Planning and Development Group (433)
United Border Community Town Council (434)
Chula Vista Chamber of Commerce
San Diego County Hispanic Chamber of Commerce
San Ysidro Chamber of Commerce
Tijuana Chamber of Commerce
Tijuana Economic Development Corporation
South County Economic Development Corporation
Regional Economic Development Corporation

OTHER GROUPS AND/OR INDIVIDUALS
Union-Tribune City Desk (140)
Metro News (141)
Southwestern College
Theresa Acerro (230)
Janay Kruger (233)
Janet Vadakkumcherry (236)
Kaiser Permanente
Jean Cameron
Jimmy Ayala, Pardee Homes
John Ponder, Shephard Mullin
Mark Rowson, Land Development Strategies
Nicola Boon, Metro Airpark, LLC
Jack Gorzeman, ESA
Stephanie Morgan Whitmore - RECON (Consultant)

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OTAY MESA COMMUNITY PLAN UPDATE
Letters of Comment and Responses

Letters of comment to the Draft PEIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft PEIR public review period contained accepted revisions that resulted in changes to the final PEIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

A State Clearinghouse RTC-3
B U.S. Army Corps of Engineers RTC-4
C U.S. Fish and Wildlife Service/California Department of Fish and Wildlife. RTC-5
D California Department of Transportation RTC-12
E Native American Heritage Commission RTC-20
F San Diego Association of Governments RTC-25
G Endangered Habitats League RTC-29
H Otay Mesa Chamber of Commerce RTC-32
I Otay Mesa Property Owners Association RTC-44
J Rincon RTC-49
K San Diego County Archaeological Society, Inc. RTC-51
L ColRich (CR Otay Canyon Ranch Associates LLC) RTC-53
M Melvyn Ingalls RTC-55
N National Enterprises Incorporated (NEI) RTC-58
O Sheppard Mullin (Chang) RTC-60
P Sheppard Mullin (Torrey Pines) RTC-88

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Letter A

Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Ken Alex
Director

October 25, 2013

Myra Herrman
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Subject: Otay Mesa Community Plan Update
SCH#: 2004051076

Dear Myra Herrman:

A-1 The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 24, 2013, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1 Comment acknowledged. Please note that comment letters were received directly from the following State agencies before the close of public review on October 25, 2013: Department of Fish & Wildlife (joint letter with U.S. Fish & Wildlife Service), Native American Heritage Commission, and the Department of Transportation. All letters and City responses follow this SCH letter.

Letter B

DEPARTMENT OF THE ARMY
Los Angeles District Corps of Engineers
Regulatory Division-Carlsbad Field Office
5900 La Place Court, Suite 100
Carlsbad, CA 92008

October 31, 2013

REPLY TO
ATTENTION OF
Office of the Chief
Regulatory Division

Ms. Myra Herrmann, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, California 92101

SUBJECT: Information regarding requirement for Department of the Army Permit

Dear Ms. Herrmann:

B-1 This is in response to information received regarding Otay Mesa Community Plan Update. Based on the information you have provided, we are unable to determine if the proposed work would be regulated under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please review your project and determine if you need a permit.

Applications and additional information are available on our website http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx. If you have any questions, please contact Shari Johnson of my staff at 760-602-4829 or via e-mail at Shari.Johnson@usace.army.mil.

Sincerely,

Therese O. Bradford
Chief, South Coast Branch

B-1 The project submitted to the USACOE for review involves a community plan update which is intended to provide guidance for future development in the community. The CPU, in and of itself does not require a Section 404 permit. However, Section 404 permits may be required for future development projects implemented in accordance with the CPU. This will be determined when site-specific biological studies are prepared during project-level environmental review.

Letter C

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624

California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-14B0007-14TA0003

OCT 25 2013

Ms. Myra Herrmann
Environmental Planner
City of San Diego Development Services Center
Planning Division
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Comments on the Public Draft Otay Mesa Community Plan Update and the associated Draft Program Environmental Impact Report, City of San Diego (SCH#2004051076)

Dear Ms. Herrmann:

C-1 The California Department of Fish and Wildlife (Department) and the U.S. Fish and Wildlife Service (Service), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced draft Otay Mesa Community Plan Update (CPU) and Program Environmental Impact Report (PEIR), dated September 10, 2013. The comments provided herein are based on information provided in the draft CPU, PEIR and associated documents, our knowledge of sensitive and declining vegetation communities in the City of San Diego (City), and our participation in the Multiple Species Conservation Program (MSCP) and the City's MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City participates in the NCCP and the Service's HCP programs by implementing its approved SAP.

C-2 The Otay Mesa CPU serves as a comprehensive update to the adopted 1981 Otay Mesa Community Plan (Community Plan) and was undertaken to address substantial land use changes

C-1 Comment noted. This paragraph provides information regarding the content of the letter.

C-2 Comment noted. This paragraph provides information regarding the content of the letter.

C-2 con

that have occurred since that time. The CPU is intended to refine and implement the general vision and goals of the 2008 City of San Diego General Plan Update as it relates to land use and circulation within the approximately 9,300-acre Otay Mesa community. The CPU will also require the adoption of two Community Plan Implementation Overlay Zones (CPIOZs) that will be used to determine whether subsequent projects will be processed ministerially (CPIOZ Type A) or require discretionary approval through a Site Development Permit (CPIOZ Type B). Projects processed under the CPIOZ Type B application will require preparation of an initial study in accordance with CEQA to determine whether the project can rely on the Otay Mesa CPU PEIR or will require subsequent CEQA documentation and review (e.g., mitigated negative declaration or PEIR addendum).

C-3

We have been meeting regularly with City staff on both the CPU and the City's proposed Vernal Pool HCP (VPHCP), and it has always been our recommendation that these two documents move forward concurrently given their inter-relatedness. Otay Mesa encompasses the majority of vernal pool resources in the City that have not already been addressed (conserved or impacted) within the City's SAP; therefore, the CPU is critical to the success of the VPHCP. We are concerned that the alternative evaluated in the CPU does not match the City's preferred alternative being developed for the VPHCP.

C-4

The Wildlife Agencies and the City signed a Planning Agreement in October 2009 regarding the VPHCP. The Planning Agreement included a commitment by the City to follow an Interim Project Review Process (Exhibit C to the Planning Agreement) to ensure that projects or activities that were approved or initiated in the Planning Area before completion of the VPHCP are consistent with the preliminary conservation objectives and do not compromise successful completion and implementation of the VPHCP. To help ensure this commitment is met, the PEIR should include an analysis of the consistency of each alternative with the goals and objectives of the VPHCP, and consistency with the VPHCP should be used to determine what alternative is selected. Although the CPU (CPU Plan Policy 8.1.8) proposes to amend the community plan upon completion of the VPHCP, we recommend that the CPU not be finalized until the VPHCP is completed to help ensure that the City's commitments in the Planning Agreement are met.

C-5

The Reduced Biological Impacts Alternative included in the draft PEIR (page 10-18) is the most consistent with the City's preferred alternative for the VPHCP. It would result in increased preservation of vernal pool, coastal sage scrub, maritime succulent scrub, and non-native grassland habitat while providing for improved/expanded local wildlife corridors. This alternative would also lessen impacts to burrowing owl (*Athene cunicularia*). If the City finalizes the CPU prior to completing the VPHCP, we recommend that the City adopt the Reduced Biological Impacts Alternative for the CPU. Even if the Reduced Biological Impacts Alternative is adopted, further modification to the Community Plan may be necessary to ensure consistency with the VPHCP.

C-3 Comment noted. The City acknowledges the significant role that Otay Mesa has in the comprehensive City-wide planning efforts for vernal pools as part of the VPHCP. The CPU and VPHCP projects have been closely coordinated; however, they are two separate and distinct projects with different processing schedules. It is anticipated that the draft VPHCP and associated environmental document will be distributed for public review and then followed by the public hearing process in 2014.

The CPU Reduced Biological Impacts Alternative is similar to the proposed vernal pool preserve mapping for the VPHCP project, however, it also includes increased preservation of upland habitats (i.e., coastal sage scrub and maritime succulent scrub) that do not contain vernal pools resources. As discussed above, in addition to the planning for the VPHCP, subsequent to adoption of the CPU, a specific plan will be prepared for the Southwest Village area which contains a significant number of vernal pools. Neither one of these plans have been through the discretionary review and hearing process.

C-4 The CPU is a planning document which guides development within the community plan area but it does not entitle any development or ground disturbance that would impact vernal pool resources. Therefore, per the definition of interim projects in Exhibit C of the Planning Agreement, the CPU is not considered to be an interim project since it would not adversely impact vernal pool species and habitat. All future projects implemented in accordance with the CPU would require subsequent environmental review. As discussed in Response to Comment C-3, the CPU includes specific policies and recommendations for the protection of vernal pools which currently do not exist in the adopted community plan. In addition, Conservation Element Policies 8.1.-1 through 8.1-6 include direction to implement the Environmentally Sensitive Lands Regulations, the MSCP SAP, and the Biology Guidelines.

C-5 Comment noted. The Reduced Biological Impact Alternative correctly identifies biological impacts, including those to vernal pool resources that would be reduced if this alternative were adopted.

C-6

Our specific comments on the draft Otay Mesa CPU and PEIR are enclosed. We appreciate the opportunity to comment on the two documents. If you have any question regarding this letter or would like to schedule a meeting to discuss the CPU and PEIR, please contact Kyle Dutro of the Department at 858-467-4267 or Patrick Gower of the Service at 760-431-9440, extension 352.

Sincerely,

for
Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

for
Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

C-6 Comment noted. Please see responses to General Comments provided below.

Ms. Myra Herrmann (FWS/CDFW-14B0007-14TA0003) Enclosure, page 1

GENERAL COMMENTS

C-7 1. The Wildlife Agencies are concerned with the City's proposed procedure for processing subsequent development projects within Otay Mesa. Based on our interpretation of information provided in the PEIR, the City will process some future projects ministerially and others could potentially rely on the CEQA analysis provided in the PEIR. In the absence of project specific public review, how will the City implement the Interim Project Review Process that is included in the VPHCP Planning Agreement? In addition, we rely on the CEQA public review process to fulfill our oversight responsibilities under the MSCP. Please provide more detailed information in the PEIR regarding how future projects will be processed and, if future projects may rely entirely on the CEQA analysis provided in the PEIR, how the City will coordinate with the Wildlife Agencies to ensure projects are consistent with MSCP and the VPHCP Planning Agreement.

C-8 2. Please revise any references to "State Fish and Wildlife Code" in the PEIR to read "Fish and Game Code". Although the Department's name has changed to Fish and Wildlife, the legal code under which the Department operates continues under the former name.

SPECIFIC COMMENTS ON THE CPU

C-9 1. Section 2.0 (Land Use Element) should be updated to include a goal that addresses the preservation, management, and monitoring of open space within the MHPA consistent with the City's SAP and the VPHCP. Table 2-3 (Community Plan Land Use Designations) includes a table of the community plan land use designations. Please clarify what the difference is between "open space" and "resource based parks." Which designation would be used for MHPA lands that are being conserved under the City's SAP and VPHCP?

C-10 2. Section 2.1 (Specific Plan Areas) should be updated to include a reference to the City's SAP and VPHCP. In addition it should include policies and recommendations that address preserve design, minimization of edge effects, maintenance of corridors, and the requirements of the MHPA Guidelines for Otay Mesa and River Valley (pages 8 to 10), section 1.4.2 (General Planning Policies and Design Guidelines) and Table 3-5 (Conditions of Coverage) in the City's SAP.

C-11 3. Section 2.6 (Open Space and Parks) should be updated to emphasize the importance of the vernal pool resources as well as the grasslands for raptors, including the burrowing owl. It should differentiate between lands to be conserved as part of the City's SAP and VPHCP and active park lands and include specific policies and recommendations for both types of open space.

C-12 4. Section 3 (Mobility Element) includes a discussion of all forms of transportation, including a network of streets and freeways, many of which will cross the MHPA. This section should but updated to include a discussion regarding how roads will be designed to be consistent with the MHPA Guidelines for Otay Mesa and River Valley (pages 8 to

RESPONSE TO GENERAL COMMENTS:

C-7 See Response to Comment C-3. In addition, all industrial and commercial development implemented in accordance with the CPU will be subject to review under CPIOZ. The village areas require specific plans which are discretionary projects requiring City Council approval prior to any development, and will be subject to further review and analysis.

C-8 This revision has been made to the Final EIR.

C-9 Goals for preservation, management, and monitoring of open space are contained in the Conservation Element (specifically, Policies 8.1.-4 through 6). See Table RE-2 of the General Plan for definitions of resource-based parks and open space. MHPA lands that are conserved have an Open Space land use designation.

C-10 Land Use Policy 2.1-2 b states that a subsequent specific plan provide a land use map consistent with a future VPHCP. The policy has been updated to include a reference to the MSCP Subarea Plan.

C-11 The Conservation Element addresses the City's resources (see CE-6 & CE-7, including vernal pools and burrowing owls. The Recreation Element addresses park lands and includes specific policies related to active and passive park uses.

C-12 Per the TIS for the CPU, all roads are necessary for access and circulation within the CPU area, regardless of which alternative is approved. The existing circulation plan, adopted November 23, 1999 by Resolution R-292480, was evaluated under the City's SAP. The existing circulation plan includes Siempre Viva Road connecting with Camino de la Plaza in San Ysidro, as well as a rail line connecting the San Ysidro rail to Siempre Viva Road across Spring Canyon. The proposed CPU's circulation plan removes the rail line and the Siempre Viva Road-Camino de la Plaza connection, which reduces impacts in the southwest quadrant of the community planning area. As future alignments are submitted, a biological analysis will be required when applicable and each project will be subject to subsequent review in accordance with CEQA, as well as review for consistency with City's MSCP SAP and Biology Guidelines.

Siempre Viva Road across Spring Canyon was not modeled or considered as an option for the CPU.

C-12 cont.

10), section 1.4.2 (General Planning Policies and Design Guidelines) and Table 3-5 (Conditions of Coverage) in the City's SAP. To the extent feasible, we recommend road easements occur outside of the MHPA, be designed to cross the shortest length of MHPA as possible, and provide for fully functional wildlife movement through use of bridges or culverts and fencing. We also recommend that the final PEIR include a figure clearly depicting these roads and any other proposed encroachment into the MHPA (e.g. utilities, trails) so we can better understand the overall proposed impact to the MHPA. Although the City's SAP does allow for infrastructure to cross the MHPA under certain circumstances, we are very concerned with several of the proposed roadways and the potential impacts to both the City's SAP and VPHCP. Of particular concern are the proposed extensions of Beyer Road, Airway Road and Siempre Viva Road across Spring Canyon, and the proposed reclassifications of Lonestar Road, Aviator Road, Heritage Road, and Caliente Avenue as these have the potential for increased impacts to biological resources when compared to the adopted community plan evaluated under the City's SAP.

C-13

5. Section 3.4 (Bicycles) includes a recommendations (3.4-1) to connect bikeways within the village areas to trail heads with access to the canyon system trails and pathways, and (3.4-2) to provide multi-use trails. Recommendation 3.4-2 does include a reference to being consistent with City's SAP, but then references a figure of proposed trails (Figure 7.1) that we have had no discussion or input on. Prior to designating any trails within the MHPA, a natural resource management plan (NRMP) should be completed for the area that identifies the biological goals and objectives for this section of the MHPA and includes Area Specific Management Directives (ASMDs) for those species requiring them as a condition of coverage. The NRMP can then be used to determine whether trails and mountain bike riding are compatible with those biological goals and objectives.

C-14

6. Section 7.2 (Open Space Lands and Resource Based Parks) focuses on the canyons, but does not discuss the mesa top areas that support vernal pools and burrowing owls. This section should include a discussion of these valuable resources and how they will be protected.

SPECIFIC COMMENTS ON THE PEIR

C-15

1. Section 3.3 (CPU Objectives) should reference the City's SAP and VPHCP. The Open Space Objective should be reworded to state: Protect the canyon lands, adjacent mesa tops supporting vernal pool habitat, and sensitive biological resources consistent with the goals and objectives of the City's SAP and VPHCP. We recommend that recreational goals be addressed in a separate objective from the biological goals of the City's SAP and VPHCP.

C-16

2. Section 3.4.2.7 (Conservation Element) references preserving biological resources, including vernal pools, however it does not reference the City's SAP or VPHCP. This section should reference implementing the goals and objectives of the City's SAP and VPHCP. The Conservation Element includes goals regarding water supply and local

C-13 Large portions of the open space and MHPA lands are privately owned. Specific Plans prepared for the village sites would provide further analysis and design for any trails and when applicable, would include input from the Wildlife Agencies. As part of the subsequent review process for the Specific Plans and trail plan, ASMDs would be identified. Otherwise, at such time that the City begins the process for acquisition of lands for the MHPA and open space, an NRMP, which would include ASMDs, would be completed.

C-14 Language has been added to Section 7.2 of the CPU.

C-15 As recommended, the following language has been added to the CPU objectives and to Conservation Element Policy 8.1-2: "and adjacent mesa tops." The Conservation Element of the CPU (Section 8.1) discusses and provides policies related to the City's MSCP SAP, VPHCP, and biological resources, including vernal pools.

C-16 Section 3.4-2.7 includes a reference to the City's MSCP SAP and draft VPHCP. Community farms and gardens are anticipated to be located outside of any MHPA lands. However, if this use were proposed within the MHPA, it would be a future project requiring subsequent review for consistency with the CPU goals and policies, the City's MSCP SAP, and the Biology Guidelines.

C-16 cont. food generation through community farms and gardens. Please clarify how these goals will be met given the absence of any water storage or agricultural land use designations. As an example, community farms and gardens are not an identified compatible use within the MHPA; therefore, is it envisioned that this could be accomplished within the non MHPA park lands?

C-17 3. Section 3.4.3.1 (Specific Plan Areas) includes a list of policies and recommendations for Specific Plans. It would be helpful to reference Figure 3-9 which depicts the two areas proposed for Specific Plans. This section references the VPHCP; however, it should also reference the City's SAP, including policies regarding preserve design, minimization of edge effects, maintenance of corridors, and the requirements of the MHPA Guidelines for Otay Mesa and River Valley (pages 8 to 10), section 1.4.2 (General Planning Policies and Design Guidelines) and Table 3-5 (Conditions of Coverage).

C-18 4. Section 3.4.3.7 (Parks, Open Space, and Recreation). This section should reference the City's SAP and VPHCP. Recreational opportunities should be consistent with goals and objectives of the City's SAP, VPHCP and any NRMPs developed for Otay Mesa. As we stated above, it may be appropriate to separate out recreational goals from the biological goals and objectives of City's SAP and VPHCP.

C-19 5. Section 3.4.4 (Mobility Element Roadways) includes a table of changes to the CPU area circulation network and a reference to Figure 3-6. Figure 3-6 is difficult to read and does not have all the roadways labeled that are included in the table. Please update the figure to make it easier for the reader to locate each of the road segments identified in the table. In addition, it would be helpful to list all of the proposed mobility element roadways, not just the ones being changed.

C-20 6. Related to the uncertain use of a CEQA process, we are especially concerned with those projects that could impact burrowing owl. The draft PEIR (page 5.4-49) concludes that impacts to non-native grassland would affect the preferred habitat of the burrowing owl and would likely reduce population numbers. It also correctly concludes that the loss of agricultural lands and disturbed lands may also negatively affect the conservation of burrowing owls. Table 3-5 of the City's SAP identifies several areas within the Otay Mesa Community Plan area that are important for the conservation of burrowing owls, including Spring Canyon, Otay Mesa, and the Otay River Valley. We have been working with the City to develop a comprehensive conservation strategy for burrowing owls and recommend that the strategy be completed so it can be included in the CPU. Because a strategy for burrowing owl has not been completed, and use of methodologies to actively or passively relocate burrowing owls requires approval by the Wildlife Agencies, we strongly encourage early coordination with the Wildlife Agencies to develop project-specific burrowing owl mitigation plans until a comprehensive strategy is completed. Early coordination should avoid untimely delays to the project applicant, be cost-effective, and result a better outcome for the local owl population.

C-17 A reference to Figure 3-2 has been added, as that figure includes the land use designations for the CPU. This section has also been updated to include a reference to the City's MSCP Subarea Plan.

C-18 As suggested, the following language "and consistency with the City's MSCP Subarea Plan" has been added to Land Use Policy 2.6-1.

C-19 Figure 3-6 provides an illustration of the backbone roadway infrastructure proposed within the CPU area. Due to the size of the exhibit, it is not practical to illustrate every roadway.

C-20 Comment noted. Early coordination with the Wildlife Agencies would be facilitated by the project biologist and City staff during the subsequent project review process.

Ms. Myra Herrmann (FWS/CDFW-14B0007-14TA0003) Enclosure, page 4

C-21 7. The PEIR (pages 5.4-59 and 5.4-62) indicates that several mobility element roads are planned within or adjacent to the MHPA and makes reference to Figure 5.4-8; however, we cannot find this figure. The final PEIR should include a figure showing the locations of these roads relative to the MHPA.

C-22 8. CPU Plan Policy CE 8.1.6 (page 5.4-45 of the PEIR) states that ASMDs will be implemented as part of the CPU and serve to reduce impacts to below a level of significance (page 5.1-64 of the PEIR). Please clarify when/how these ASMDs will be developed and implemented.

C-21 The two references to Figure 5.4-8 have been revised to reference the correct Figure 5.4-5.

C-22 Please see Response to Comment C-13.

Letter D

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October 23, 2013

11-SD-905
PM VAR
Otay Mesa Community Plan Update
Draft PEIR – SCH#2004051076

Ms. Myra Herrmann
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. Herrmann:

D-1 The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Draft Programmatic Environmental Impact Report (PEIR) and Technical Studies for the Otay Mesa Community Plan Update (CPU), specifically the included Transportation Analysis dated June 14, 2012. The Otay Mesa Community is located within the southern region of the City of San Diego (City), bounded on the north by the City of Chula Vista and on the south by the Tijuana River Valley and the San Ysidro Communities. The State highways serving Otay Mesa are Interstate 805 (I-805), State Route 905 (SR-905), State Route 125 (SR-125) and the proposed State Route 11 (SR-11).

Caltrans would like to submit the following comments on these five documents:

1. Otay Mesa CPU Draft PEIR;
2. Otay Mesa CPU Draft PEIR, Appendix I: Noise Analysis;
3. Otay Mesa CPU Draft PEIR, Appendix J: Transportation Analysis;
4. Otay Mesa CPU Public Draft; and
5. Otay Mesa CPU Draft Public Facilities Financing Plan and Facilities Benefit Assessment.

1. Otay Mesa CPU Draft PEIR, September 10, 2013

D-2 One of Caltrans' ongoing responsibilities is to collaborate with local agencies to avoid, eliminate, or reduce to insignificance potential adverse impacts to highway facility operations by local development on State highways. Therefore, Caltrans is concerned that the Draft PEIR states on page 5.12-48, and throughout the document, that:

> *The CPU would significantly impact five segments of SR-905* [between Picador Boulevard and La Media Road]. *Caltrans has designed the SR-905 to allow for the construction of HOV lanes, which would reduce the CPU impacts to below a level of significance at two of the five impacted freeway segments. However, the addition of HOV lanes to SR-905 is not a funded or planned project at this time and improvements to these facilities cannot be guaranteed to be implemented by the City. Additional mitigation such*

D-1 Comment noted. This paragraph provides information regarding the content of the letter.

D-2 Comment noted. Due to the cost of providing additional freeway lanes and interchange improvements on SR-905, the resultant facilities benefit assessment fees that would be required to provide the improvements would make development economically infeasible. In addition there is some uncertainty related to the actual development and associated traffic impacts that will materialize over time. Transportation studies prepared for Specific Plans and subsequent development projects would more accurately identify impacts and provide appropriate mitigation through Public Facilities Financing Plan (PFFP) amendments and project-specific mitigation – either physical improvements or transportation demand management measures which may be more cost effective than alternative infrastructure improvements, or both. The PFFP project descriptions for projects T-11.1, T-11.2, T-16.7, T-21.1, T-21.2, T-25.2, and T-25.3 have been modified to indicate that these additional improvements should be considered based on future specific plan and development project studies.

D-2 cont.

as TDM measures may be identified in the future at the project-level. Thus, at the program-level, CPU impacts to the five SR-905 freeway segments would remain significant and unavoidable.

Where feasible, Caltrans endeavors with any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) standards. Therefore, with the acknowledgement that the SR-905 project, completed in July 2012 as a six-lane freeway from I-805 to the Otay Mesa Port of Entry (POE), was designed "to allow for the construction of HOV lanes, which would reduce the CPU impacts to below a level of significance at two of the five impacted freeway segments," and that "the addition of HOV lanes to SR-905 is not a funded or planned project at this time," Caltrans would appreciate an explanation of why "these facilities cannot be guaranteed to be implemented by the City," and are not included in the Draft Public Facilities Financing Plan (PFFP) and Facilities Benefit Assessment (FBA). This strategy and statement in the PEIR defers the responsibility of the implementation of such improvements to "others."

Accordingly, the Mitigation Framework in the PEIR for traffic impacts to SR-905 states that:

At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact (page S-28).

As a result, the Draft PEIR defers the identification of detailed mitigation recommendations for direct impacts to SR-905 to future discretionary development projects on a case-by-case basis. Instead it is recommended by Caltrans that the inclusion of HOV lanes and/or other improvements to SR-905, such as auxiliary lanes or interchange improvements be considered in the Draft PFFP and FBA to allow future discretionary development projects to better identify and contribute their fair share, as well as identify potential local cost sharing for such improvements.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

D-3 Caltrans appreciates the explanation starting on page 4-1 that:

In accordance with CEQA Guidelines, the baseline for establishing the environmental setting and existing conditions is determined to be the date when the NOP [Notice of Preparation] *is published. ... The baseline for the purpose of this PEIR is, therefore those conditions occurring at the time of the third NOP* [October 1, 2010] *and are the conditions upon which physical changes are examined in the PEIR. It should be noted however, that the baseline for analysis of the Transportation/Circulation Section is different because of changes to the circulation system between when the 2010 NOP was issued and the time this PEIR was made public. This is specifically evident relative to State Route 905, which was under construction in 2010 and is now open for use within the CPU area; as well for the reopening of State Route 125.*

D-3 Pursuant to CEQA Guidelines Section 15126.2(a), "In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published." Although there were multiple changes to the circulation system between issuance of the NOP in 2010 and release of the PEIR for public review, the existing conditions analysis was not updated to reflect the changed conditions due to the fact that updating the analysis would not have any bearing on the identification of significant impacts at buildout of the community plan. Therefore, the 2010 NOP is the appropriate baseline conditions, as further described in Section 5.12.2 of the PEIR and as acknowledged in the comment.

D-4 Please note that in addition to SR-905 and SR-125, exhibits and analyses throughout the Otay Mesa CPU Draft PEIR and Technical Studies referencing SR-11 are not current, and should reflect the preferred alternative for SR-11 from the Caltrans *State Route 11 and the Otay Mesa East POE Final Tier II Environmental Impact Report/Environmental Impact Statement* (EIR/EIS), March 2012, currently available at http://www.dot.ca.gov/dist11/Env_docs/SR11/Final_tech.html

D-5 In addition, please ensure that the exhibits and analyses referencing the South Bay Bus Rapid Transit project should reflect the route alignment and stops as proposed by SANDAG in the project's Final Environmental Impact Report certified in July 2013.

D-6 Caltrans agrees with the "Build-out Recommended Lane Configurations" for the I-805/Palm Avenue interchange as shown in Figure 5.12-4a (page 5.12-40). Please note that the final Caltrans Project Study Report (PSR) for the I-805/Palm Avenue interchange project, approved on July 17, 2013, proposes an Eastbound to Northbound loop on-ramp as the most likely alternative design, with slightly different lane striping than what is shown in the Draft PEIR, and subsequently in the Transportation Analysis (Appendix J).

D-7 The Draft PEIR also states that "The reasons for not recommending the improvements [to 24 roadway segments and 49 intersections] are detailed in the Findings and the Statement of Overriding Considerations. The impacts are considered significant and unavoidable" (pages S-26 and S-27). However, page 1-8 explains that "a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unmitigable will be prepared and compiled as part of the PEIR finalization process," and are therefore not yet available for review. Please provide Caltrans with the Statement of Overriding Considerations as part of the City's response to these comments.

2. Otay Mesa CPU Draft PEIR, Appendix I: Noise Analysis, August 29, 2013

D-8 Page 19 of the Noise Analysis states that:

> *Truck volumes for I-805, SR-905, SR-125, and SR-11 were obtained from California Department of Transportation (Caltrans) truck counts (Caltrans 2009). For I-805, a traffic mix of 95.1 percent cars, 4.2 percent medium trucks, and 2.7 percent heavy trucks was assumed. For SR-905, SR-125, and SR-11, a traffic mix of 91.9 percent cars, 5.5 percent medium trucks, and 2.6 heavy trucks was observed.*

Please note that SR-11 has not yet been constructed, as of both the Draft PEIR baseline of 2010 and the Draft PEIR public review of September-October 2013, therefore actual volumes would not be available.

D-4 Comment noted. Notes have been added to the figures in the Final EIR Transportation/Circulation section that show the future SR-11 and Otay Mesa East Point of Entry to refer readers to the Caltrans SR-11 and Caltrans Final Tier II EIR/EIS, dated March 2012 for the preferred alternative.

D-5 The Mobility Element Transit Route Map has been revised to reflect the interim alignment of the southbound BRT in addition to the ultimate alignment that will be in effect when the SR-905/SR-125 freeway interchange is constructed. In addition to the planned southbound BRT stop at the Port of Entry, the figure shows an additional "potential transit stop" at the future Lone Star interchange which the City understands is not part of the current BRT project, but which may be desired in the future.

D-6 Comment noted.

D-7 Draft CEQA Findings and Statement of Overriding Considerations and City response to comments will be made available to Caltrans, other commenter's and City decision-maker with release of the Final EIR.

D-8 Comment noted.

D-9 3. Otay Mesa CPU Draft PEIR, Appendix J: Transportation Analysis, June 14, 2012 with corrections dated August 30, 2013

Pages 8-4 to 8-5 of the Transportation Analysis state the following regarding significant impacts to the State Highway System:

> *The Adopted SANDAG 2050 Regional Transportation Plan includes two managed lanes on I-805 in each direction north of SR-905. ... These added managed lanes should be considered partial mitigation for regional cumulative traffic impacts. The implementation of Transportation Demand Management Plans for large development projects would also reduce, but not mitigate for, regional cumulative freeway impacts.*
>
> *State Route 905 traffic impacts would be significant and unmitigated for all three scenarios. State Route 905 has been designed so that median High Occupancy Vehicle lanes could be installed in the future, but are not currently planned or funded by Caltrans. The addition of HOV lanes would provide partial mitigation for local and regional cumulative impacts but would not provide acceptable levels of service on segments of SR-905 projected to be at level of service "F", so that SR-905 traffic impacts would remain significant and unmitigated. The City of San Diego requested that HOV lanes on SR-905 be added to the Regional Transportation Plan as part of comments on the Draft 2050 RTP DEIR. The* [Unconstrained] *Network in the 2050 RTP includes 8 freeway lanes on SR-905.*

Caltrans appreciates the coordination between the City and SANDAG on including improvements to the State Highway System in the Regional Transportation Plan (RTP). However, as this analysis guides the impacts and mitigation measures identified in the Draft PEIR, Caltrans would like to reiterate a request for an explanation of why HOV lanes and/or improvements to 8 freeway lanes on SR-905 "cannot be guaranteed to be implemented by the City," and were not included in the Draft PFFP and FBA. Such deferment of improvements to the possible inclusion in future RTP updates is not appropriate. Inclusion of improvements in the PFFP and FBA could instead help facilitate a local cost sharing for improvements to regional transportation facilities, which may also assist in the future consideration of improvements in the RTP.

D-10 Please note that SR-905 has additional phases, as described below:

> Phase 3 – The SR-905/SR-125 freeway-to-freeway interchange will be constructed during this phase. A four-lane local access ramp will be constructed from the SR-905/SR-125 interchange east to the intersection with Enrico Fermi Drive. This project is not funded at this time and has not been scheduled.
>
> Phase 4 – The final phase will construct the Heritage Road interchange ramps. Phase 4 will only be constructed once other parties have made other key improvements to the area, which is not expected to occur prior to 2016. It is anticipated that the City of San

D-9 See Response to Comment D-2.

D-10 Comment noted.

D-10 cont.

Diego will finance the ramps to accommodate the full build-out of the Otay Mesa community plan area.

D-11

As for the SR-905 interchanges with the local road network, Caltrans concurs with the Transportation Analysis that:

> *Improvements are recommended at the interchange ramps for SR-905/Caliente Avenue, SR-905/Future Heritage Road, SR-905/Britannia Boulevard; SR-905/La Media Road; SR-905/Siempre Viva Road. Subsequent design requirements from Caltrans may change the recommended lane configurations* (page ES-71).

However, the Draft PEIR states that for the aforementioned SR-905 interchange ramps, "the following mitigation shall be provided [to reduce impacts]: TRF-1: Intersections shall be improved per the intersection lane designations identified in Figure 5.12.4" (Draft PEIR page S-27). As "Subsequent design requirements from Caltrans may change the recommended lane configurations" per the Transportation Analysis.

Caltrans recommends that the City initiate the process of working with Caltrans to develop and identify improvements for each of the aforementioned SR-905 interchanges, and/or other improvements, in order to determine Caltrans design requirements, cost estimates, and to preserve right-of-way. It is anticipated that all SR-905 ramps will be metered and in operation.

D-12

4. Otay Mesa CPU Public Draft, September 2013

As of January 1, 2011, Assembly Bill 1358 requires that any substantive revision of the circulation element of a general plan include planning for a balanced multi-modal transportation network that meets the needs of all users of streets, roads, and highways in a manner that is suitable to the context of the general plan. The Act defines all users as motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. Caltrans supports Complete Streets policies and continues to implement our own Complete Streets directive, DD-64-R1.

Caltrans supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. As a result, potential transit mitigation for development impacts should also be analyzed, such as improved transit accommodation through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements which can improve mobility and alleviate traffic impacts to State facilities.

Caltrans appreciates the acknowledgement of past and ongoing collaboration between the City and regional stakeholders, as stated on page I-10:

> *Because the Otay Mesa community planning area includes regional impacts and issues, the City works closely with San Diego Association of Governments (SANDAG), the California Department of Transportation (Caltrans), the Airport Authority, the City of*

D-11 Comment noted. The City agrees that further study is needed to develop future freeway and interchange improvements. As specific plans and other discretionary development projects in Otay Mesa are processed, the City will coordinate review of transportation analysis with Caltrans, as appropriate; in order identify recommended improvements or other measures to mitigate impacts. Meanwhile, the Public Facilities Financing Plan projects T-11.1, T-11.2, T-16.7, T-21.1, T-21.2, T-25.2, and T-25.3 have been modified to indicate that additional improvements may be indentified in the future.

D-12 As stated in Section 5.12.6.1 of the PEIR, the CPU includes several alternative transportation policies with which future development projects would be required to comply. These policies promote the future availability of transit, alternative transportation convenience (including connectivity and speed), and the appeal of alternative transportation. Because the transit policies are included as part of the policy framework of the CPU, no impacts related to transit were identified, and therefore, no additional mitigation is required. Potential transit mitigation measures for development project impacts would be analyzed and identified during the development review process and through coordination between the City and SANDAG.

D-12 cont. *Chula Vista and County staff to coordinate a comprehensive approach on planning issues that cross jurisdictional boundaries.*

D-13 Further coordination is needed between Caltrans and the City to properly implement Policy 3.1-1(b) on page ME-2 to "Provide safe, convenient, and attractive pedestrian crossings of SR-905."

D-14 Further coordination is also needed between Caltrans and the City on how to simultaneously implement both Policy 3.5-6 to "Maintain Britannia Boulevard, La Media Road, and the border access road as the truck routes. Work with Caltrans periodically to assess truck movement and needs along the truck routes" (page ME-20), and Policy 2.4-9 to "Provide adequate buffers, such as land uses, landscape, walls, and distance between the residential component of the Business Park-Residential Permitted lands, SR-905, and Britannia Boulevard to minimize negative impacts of air quality, noise, and truck transportation on residents" (page LU-27). The Draft CPU acknowledges that "Multi-family residential uses are allowed [in Business Park-Residential Permitted] at a density range of 15-44 dwelling units per acre," and that "these lands are in close proximity to SR-905, and the designated truck route of Britannia Boulevard." (page LU-26). Caltrans wants to ensure that major goods movement designated truck routes are compatible with surrounding land uses. We recommend that the City consider an implementation strategy for the Heritage/SR-905 interchange to allow for its construction before allowing any residential developments to avoid mixing residential uses with heavy trucks. The California Air Resources Board (ARB) recommends as a guideline a buffer of 500 feet between residential uses and freeways.

D-15 5. Otay Mesa CPU Draft Public Facilities Financing Plan and Facilities Benefit Assessment, Fiscal Year 2014

It is understood that the City of San Diego will coordinate with Caltrans to identify a list of improvement projects for the Otay Mesa CPU Financing Plan. The Otay Mesa CPU as currently devised defers the identification of detailed mitigation recommendations for direct impacts to SR-905 to future discretionary development projects on a case-by-case basis. Again, including improvements to SR-905 in the Draft PFFP and FBA may allow future discretionary development projects to better identify and contribute their fair share, as well as identify local cost sharing for such improvements.

As previously stated, Caltrans also recommends that the City initiate the process of working with Caltrans to develop and identify improvements for each of the aforementioned SR-905 interchanges, and/or other improvements, in order to determine Caltrans design requirements, cost estimates, and to preserve right-of-way. It is anticipated that all SR-905 ramps will be metered and in operation.

Please note that the Draft PFFP and FBA is inaccurate for the I-805/Palm Avenue interchange project, as page 32 shows construction financing is scheduled for Fiscal Years (FYs) 2028 and 2029. The final PSR for the I-805/Palm Avenue project has programmed Caltrans resources for a construction start date of 2017. The Environmental Phase is scheduled to start soon. Caltrans

D-13 Comment noted. It is anticipated that this coordination will occur through the project review process as improvements are planned and implemented.

D-14 Comment noted. It is anticipated that coordination related to Policy 3.5-6 will occur through the Caltrans coordination section in the Transportation and Storm Water Department's – Transportation Engineering Operations Division and coordination related to Policy 2.4-9 will occur through the subsequent development project review process.

D-15 Development of the PFFP project schedule considered many factors including projected demand for facilities and availability of revenues based on development projections. Available funding limits the number of projects that can be implemented in the early years of the schedule. Subsequent development projects implemented in accordance with the CPU will be required to demonstrate compliance with the applicable CPIOZ, CPU and GP policies as well as development standards and guidelines specific to the project type. Also see Response to Comment D-11.

The PFFP has included $5.1 Million of Continuing Appropriation and an additional $0.3 Million in funding during FY 2014 for a total of $5.4 Million available to the I-805/Palm Interchange project as early as FY 2014. (Refer to Otay Mesa PFFP, page 32)

D-15 cont.

expects at least some stage of construction to take place at this interchange once the environmental document is completed.

Pages 102 and 103 of the Draft PFFP and FBA identify $50,000 for design and construction in FY 2025 for SR-905/Caliente Avenue to "WIDEN CALIENTE AVENUE OVERPASS TO PROVIDE TWO NORTHBOUND AND TWO SOUTHBOUND LEFT TURN LANES. THE LENGTH OF TURN LANES IN THIS CASE WOULD BE 300 LINEAL FEET." Meanwhile, page 7-34 of the Transportation Analysis also recommends widening of the Caliente Avenue Overcrossing structure, meaning that the identified $50,000 is inadequate. Since the current SR-905/Caliente Avenue interchange is designed for one-half build-out, extensive construction will be needed to accommodate local development. Also, any Caltrans approved PSR design may have an impact on adjacent future City intersection and roadway segment projects already programmed in the Draft PFFP (e.g., the Otay Mesa Road/Caliente Avenue intersection). A build-out design of the SR-905/Caliente Avenue interchange should occur first to protect R/W before the encroachment of development.

Pages 134 and 135 of the Draft PFFP identify $21,700,000 in FY 2030 and FY 2031 to "PROVIDE FOR THE DESIGN AND CONSTRUCTION OF FOUR RAMPS CONNECTING SR-905 AND HERITAGE ROAD." Please note that Caltrans' most recent engineering estimate for half build-out of the SR-905/Heritage Road interchange is $54.8 million for R/W capital and construction capital costs.

Pages 162 and 163 of the Draft PFFP have identified a project titled "SIEMPRE VIVA ROAD (Otay Center Road to Paseo de las Americas)" for $1,400,000 in FY 2038 for "DESIGN AND CONSTRUCTION OF IMPROVEMENTS TO THIS SECTION OF SIEMPRE VIVA AS A SIX-LANE PRIMARY ARTERIAL. IMPROVEMENTS [that] WILL INCLUDE CONSTRUCTION OF INTERSECTION TURN LANES, LANDSCAPING AND STREET LIGHTING. THIS ROAD SEGMENT IS APPROXIMATELY 2,480 FEET." The SR-905/Siempre Viva Road interchange is within this project segment, yet the listing does not include improvements to the interchange as recommended in the Transportation Analysis, for which $1,400,000 would be inadequate.

Meanwhile, the Draft PFFP has not identified funding for any improvements to the SR-905/Britannia Boulevard nor the SR-905/La Media Road interchanges.

The Draft PFFP has also not identified freeway ramp meter projects, except at I-805/Palm Avenue. Please note that Caltrans is committed to using ramp metering as an effective traffic management strategy to maximize the efficiency of State facilities, per directive DD-35-R1.

D-16 Summary of significant comments:

- The traffic study base line does not include existing SR-905 as it predates its opening. This is a significant change that Caltrans has asked previously to be updated.
- Impacts to SR-905 are significant and unavoidable. The PEIR relies on the RTP and future development on a case-by-case basis to address future impacts.

D-15 cont.

The available funding for the project is sourced from the Otay Mesa FBA. As the project develops and additional funding is needed, the other possible funding source that the Palm/I-805 project may qualify for is TransNet. The project team is also evaluating Federal & State grant opportunities to assist with funding needs. Since a preferred alternative needs to be identified, the total project cost has not yet been determined. At present project costs range from $10 million to $42 million, depending on the project alternative. The I-805/Palm Avenue Interchange Project is currently beginning the Project Report / Environmental Document phase which will assess the viable project alternatives and will aim to identify the preferred alternative. Due to funding limitations, the project team will start the next phase of development by conducting a value engineering/analysis (VA) study of the project. Some considerations in the VA study will be to evaluate phasing of project scope with available funding (present & future) as programmed. In addition, the on/off ramp system is one component that will be evaluated in depth as part of the phasing of work. In addition, the VA study will also evaluate innovative traffic interchange geometry (Diverging Diamond Interchange), a proposal that is reported to be effective in improving LOS and is cost effective. It is understood that the intermediate improvements will provide relief to traffic congestion at the interchange. The City is proposing to fund the remainder of the improvements in FY 28 and FY 29 as indicated.

D-16 Comment noted. The traffic impact study was completed before SR- 905 was completed and updating the existing conditions analysis to reflect the SR-905 opening would not affect the identification of significant transportation related impacts. Also see Response to Comment D-2.

D-16 cont.

- Caltrans suggests undertaking studies to identify interchange and/or other improvements that individual project clearances in the future could use to help mitigate their impacts.
- Caltrans supports buffers between truck routes and residential uses to ensure that major goods movement designated truck routes are compatible with surrounding land uses.

Caltrans appreciates the continued coordination with City staff on this plan. If you have any questions, please contact Connery Cepeda, of the Public Transportation/Grant Administration Branch, at (619) 688-6003 or connery_cepeda@dot.ca.gov.

Sincerely,

JACOB ARMSTRONG, Chief
Development Review Branch

c: State Clearinghouse

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Letter E

STATE OF CALIFORNIA Edmund G. Brown, Jr., *Governor*

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

September 13, 3013

Myra Herrmann, Senior Environmental Consultant
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

RE: SCH#2004051075 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"OTAY MESA COMMUNITY PLAN UPDATE;"** located the Otay Mesa area near the U.S. – Mexico International Boundary; san Diego County, California

Dear Ms. Herrmann:

E-1 The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

E-2 This project may be subject to California Government Code Sections 65040.2, *et seq.*

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

E-3 If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this

E-1 Comment noted. This paragraph provides information regarding the content of the letter.

E-2 A Cultural Resources Report (2013) was prepared for the CPU and is included as Appendix E to the PEIR. A record search was conducted in May 2011 at the South Coastal Information Center, San Diego State University using the California Historical Resources Information System (CHRIS). A total of 262 prehistoric and historic sites/structures have been recorded within the Otay Mesa Community Plan Update boundaries (APE). The recorded resources are listed in Table 2 of the Cultural Resources Report which is included as an Appendix to the EIR.

E-3 Please refer to the Response to Comment E-2. The Cultural Resources Report (2013) prepared for the CPU was submitted to and approved by the City of San Diego Environmental Analysis Section. The City of San Diego recognizes the confidential nature of the NAHC Sacred Lands Inventory as well as the locations of all types of archaeological and Native American sites within our jurisdictional boundaries. All archaeological site information obtained as a result of evaluating the potential for cultural resources within the community plan boundaries are included in a separate confidential appendix to the Cultural Resources Report which was not made available to the public with distribution of the Draft EIR.

E-3 cont. be coordinated with the NAHC, if possible. This area is known to the NAHC to be very culturally sensitive. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

E-4 A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

E-5 Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

E-4 In accordance with Senate Bill 18, letters were distributed to all tribal groups identified by the NAHC with a potential interest in the CPU on February 26, 2007. The City did not receive any requests for consultation from any of the tribal groups or individuals identified by the NAHC within the 90 day period. In addition, all culturally affiliated tribal groups in the San Diego County area and other members of the Native American community (as noted on the public review notice distribution list) were sent a copy of the public notice for the Draft EIR in accordance with the provisions of CEQA, the City's General Plan, and the Land Development Code, CEQA Implementation Procedures. Other than the comment letter received from the NAHC, only one tribal group, the Rincon Band of Luiseno Indians submitted a letter. This letter provided information to the City regarding Kumeyaay Aboriginal Territory for the project and a recommendation to contact the appropriate Kumeyaay tribe to address how to handle discoveries in the project area. In addition, the City is committed to an on-going relationship with the local Native American community through informal meetings and/or regulatory compliance requirements.

E-5 Comment noted. The Mitigation Framework for archaeological resources included in the CPU FEIR includes specific guidance for evaluating the potential for archaeological and Native American resources within the Community Plan boundaries for future development projects. In addition, the City of San Diego's Mitigation Monitoring and Reporting Program (MMRP), which would be implemented during construction-related activities for future development projects includes a subsection which provides specific direction in the event that unanticipated human remains are encountered. The MMRP requires immediate implementation of the provisions explicitly stated in Section 5097.98 of the California Public Resources Code, Section 27491 of the California Government Code, and Section 7050.5 of the California Health and Safety Code for the discovery and subsequent treatment of human remains.

Native American Contacts
San Diego County
September 13, 2013

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
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gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
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PO Box 908 Diegueno/Kumeyaay
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Manzanita Band of Kumeyaay Nation
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PO Box 1302 Diegueno/Kumeyaay
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(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
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San Pasqual Band of Mission Indians
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Campo Band of Mission Indians
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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2004051075; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the OTAY MESA COMMUNITY PLAN UPDATE;located in the southern portion of the city of San Diego; San Diego County, California.

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Native American Contacts
San Diego County
September 13, 2013

Jamul Indian Village
Raymond Hunter, Chairperson
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Jamul , CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
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Santa Ysabel, CA 92070
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(760) 782-9092 Fax

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, cultural Resources
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(619) 445-5337

Kwaaymii Laguna Band of Mission Indians
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Ewiiaapaayp Tribal Office
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Inaja Band of Mission Indians
Rebecca Osuna, Chairman
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(760) 747-8568 Fax

Ipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
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cjlinton73@aol.com

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Native American Contacts
San Diego County
September 13, 2013

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
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(619) 659-1008 - Office
kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council
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Kumeyaay Cultural Repatriation Committee
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(KCRC is a Coalituon of 12
Kumeyaay Governments)
bp@lapostatribe.com

This list is current only as of the date of this document.

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Letter F

SANDAG

October 25, 2013 File Number 3330300

Ms. Theresa Millette
City of San Diego
Planning Division, Community Planning
1222 First Avenue, Mail Stop 413
San Diego, CA 92101

Dear Ms. Millette,

SUBJECT: Otay Mesa Community Plan Update Public Draft and Draft Programmatic Environmental Impact Report

F-1

Thank you for the opportunity to comment on the Otay Mesa Community Plan Update (CPU), draft Programmatic Environmental Impact Report (PEIR), and the Otay Mesa CPU Public Draft.

Our comments are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS), and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination and implementation of smart growth and sustainable development principles. The goal of the regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The San Diego Association of Governments (SANDAG) provides the following comments on the Otay Mesa CPU and associated draft PEIR.

Smart Growth, Land Use, and Transportation

F-2

- SANDAG supports the policies and recommendations throughout the Otay Mesa CPU and as analyzed in the draft PEIR, which encourages the use of business park lands and other uses to buffer residential development and sensitive receptors from traditional industrial uses, as well as impacts from truck and freight transportation in this key goods movement corridor. The collocation of residential development in the Central Village adjacent to the industrial uses, State Route 905, and Britannia Boulevard could result in negative impacts on sensitive uses, and so it is important to consider existing and future transportation developments in the approval of residential uses in this area. SANDAG supports the provision in the proposed plan update that separates potentially conflicting uses in the CPU area through a number of policies regarding buffer uses, separation distances, and the location of sensitive receptors on both sides of the border.

F-1 Comment noted. This paragraph provides information regarding the content of the letter.

F-2 The Central Village will process a Specific Plan, which requires approval by the City Council. The specific plan would determine refined land uses and zoning within the specific planning area, and would be consistent with all CPU policies, including buffer and transitional use policies.

F-3 • SANDAG promotes Smart Growth Principles, which result in higher density development in areas that are near transit, focuses growth near jobs and services, and can increase housing and transportation choices for residents. SANDAG appreciates that the proposed Otay Mesa CPU is generally supportive of these principles and has identified opportunities to contribute to a jobs/housing balance by providing a diversity of employment opportunities within walking distance of residences.

F-4 • The boundaries of the proposed Otay Mesa CPU contain three areas that are identified as potential Smart Growth Areas on the SANDAG Smart Growth Concept Map (SGCM): SD OM-1 - Potential Community Center, SD OM-2 - Potential Urban Center, and SD OM-3 - Potential Special Use Center. Upon adoption of the proposed Otay Mesa CPU, the smart growth designations for this planning area will need to be reevaluated to reflect the changes in land use designations and density requirements. SANDAG is available to coordinate with city staff to update the SGCM once the plan update is completed. Please refer to the SGCM and SGCM Site Descriptions on the SANDAG website.

Transportation Demand Management

F-5 The 2050 RTP/SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the CPU and subsequent specific plans and project approvals consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program.

F-6 • Where potentially significant traffic impacts are expected, please consider implementing TDM programs as mitigation. In support of this, policies ME1 through ME8 of the Mobility Element of the City of San Diego's General Plan encourage TDM to reduce single occupant vehicle travel and to mitigate traffic impacts related to development projects. SANDAG supports policies included in the Otay Mesa CPU Public Draft that promote transit-oriented development, a multimodal transportation network, and efforts to decrease Vehicle Miles Traveled (VMT) through a jobs-housing balance.

F-7 • Given that employment and other development will increase substantially in the Otay Mesa Community Planning Area, consider TDM policies and programs that require or incentivize new developments and employers to provide site designs and/or on site amenities that support alternative modes of transportation. The SANDAG TDM division, iCommute, can assist with efforts to promote and implement TDM measures. Please refer to the SANDAG publication, *Integrating TDM into the Planning and Development Process – A Reference for Cities*, for additional information.

F-8 • Consider parking management strategies that encourage alternative transportation options. In support of this, policies ME-G1 through ME-G5 of the Mobility Element of the City of San Diego's General Plan encourage parking strategies that contribute to a multimodal environment. SANDAG recognizes that the Otay Mesa CPU encourages multimodal transportation options through its policies and recommendations and the SANDAG TDM division can assist with parking management efforts. Please refer to the SANDAG publication, *Parking Strategies for Smart Growth*, and the future parking strategies tool box that SANDAG is in the process of preparing.

2

F-3 Comment noted.

F-4 Upon adoption of the CPU, staff will work with SANDAG to update the Smart Growth Concept Map.

F-5 The General Plan and Otay Mesa CPU Mobility Elements contain goals and policies that consider the needs of motorists, transit riders, pedestrians and bicyclists, and TDM programs. At the specific plan and project level, potential TDM mitigation measures for development project impacts would be analyzed and identified during the development review process and through coordination between the City and SANDAG.

F-6 As indicated in the PEIR in Section 5.12, at the project level, partial-mitigation for roadway segments, intersections, freeways and freeway ramp metering impacts may be possible in the form of transportation demand management (TDM) measures that encourage carpooling and alternate means of transportation. At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

F-7 See Response to Comments F-5 and F-6.

F-8 Comment noted.

F-9 • The SchoolPool program, offered by iCommute, is available to assist residents with commute trips to schools both in and around the community. Carpools, walking, and biking groups assist in reducing traffic congestion on local roads during peak travel times. Given that multiple schools are located within the proposed CPU boundaries, the program may benefit existing and future residents.

Active Transportation

F-10 SANDAG appreciates the policies and recommendations included in the Otay Mesa CPU that emphasize the importance of well-connected bicycle and pedestrian facilities and pathways to link activity centers with residential areas and public facilities.

F-11 • In a robust multimodal network, secure bike parking is important in the decision an individual makes in choosing biking as a viable travel mode. Please consider the establishment of secure bicycle parking, particularly near transit and/or the community village areas.

F-12 • Creation of jobs in and near the community that are also closely compatible with the skills of community residents can help to reduce VMT and the distances travelled for work. Jobs located in close proximity to employees can help to facilitate a more walkable and bike-friendly community. SANDAG acknowledges that residential development is planned in the proposed Central Village with the goal of providing housing in close proximity of employment, which could support multimodal transportation options.

Natural Environment

F-13 A key RCP objective is to preserve and maintain natural areas in urban neighborhoods, such as canyons and creeks, and provide access for the enjoyment of the region's residents. SANDAG appreciates the preservation of canyons as a valuable natural resource and recognizes the policies included in the Otay Mesa CPU that support a comprehensive distribution of well-connected parks and open spaces in the proposed CPU area.

Other Considerations

F-14 Please consider the following State of California laws when developing the draft environmental impact report: Assembly Bill 32 (Nunez, 2006), Senate Bill 375 (Steinberg, 2008), and Senate Bill 97 (Dutton, 2007), which call for the analysis of greenhouse gas emissions. Additionally, it is suggested that consideration be given to the policies included in the SANDAG Regional Energy Strategy, which promote the reduction of energy demand and water consumption.

F-15 We appreciate the opportunity to comment on the Otay Mesa CPU and associated draft PEIR. We also encourage the City of San Diego, where appropriate, to consider the following tools in evaluating this update, future specific plans, and development projects proposed in this area based on the following SANDAG publications, which can be found on our website at: www.sandag.org/igr.

1) *Designing for Smart Growth, Creating Great Places in the San Diego Region*
2) *Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region*
3) *Trip Generation for Smart Growth*

3

F-9 Comment noted.

F-10 Comment noted.

F-11 To supplement General Plan Policy ME-F.4, the Otay Mesa CPU ME Policy 3.2-3.b. has been edited to specify integration of bicycle parking. In addition, ME Policy 3.4-1 f. has been added which states: Provide secure bicycle parking, especially near transit and in the community village areas.

F-12 Comment noted.

F-13 Comment noted.

F-14 The requirements of the noted legislation were considered in the preparation of the technical analyses and EIR (see EIR section 5.18.1.3). AB32 is the basis for the reduction requirements placed on future land uses. Similarly, the analyses of GHG emissions included consideration of regional and state strategies to reduce energy and water demand (see Section 5.18.4, 5.14 and 5.9). However, it should be noted that while SB 375 includes requirements for SANDAG and other metropolitan transportation authority's to work with CARB on development of regional emission reduction targets and develop sustainable community strategies, SB 375 does not require a City's or County's General Plan or other planning policies to be consistent with the sustainable communities strategy.

F-15 Comment acknowledged.

F-15 cont.

4) *Parking Strategies for Smart Growth*

5) *Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in EIRs*

6) *Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities*

7) *Riding to 2050, the San Diego Regional Bike Plan*

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or susan.baldwin@sandag.org.

Sincerely,

SUSAN BALDWIN
Senior Regional Planner

SBA/bga

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Letter G

ENDANGERED HABITATS LEAGUE

Dedicated to Ecosystem Protection and Sustainable Land Use

EHL

BY ELECTRONIC MAIL

October 25, 2013

Myra Herrmann, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: DPEIR for OTAY MESA COMMUNITY PLAN UPDATE (30330/304032)

Dear Ms. Herrmann:

G-1 The Endangered Habitats League (EHL) is a regional conservation organization with members throughout Southern California, including the City of San Diego. EHL submits the following comments on behalf of itself and its members on the proposal to update the Community Plan for the Otay Mesa area ("Project") and the associated Draft Programmatic Environmental Impact Report ("DEIR"). As we explain below, since the Project would result in significant unavoidable impacts, it cannot be approved consistent with CEQA where feasible alternatives that carry out Project purposes exist that would avoid or substantially lessen those impacts. Because such an alternative exists—the Reduced Biological Impact Alternative—CEQA precludes approval of the Project.

G-2 "This 'substantive mandate' of CEQA requires 'public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects.'" (*County of San Diego v. Grossmont-Cuyamaca Cmty. Coll. Dist.* (2006) 141 Cal. App. 4th 86, 98.) Because the Project here would result in significant and unavoidable impacts on traffic, air quality, noise and GHG emissions, the City *must* be able to make two sets of findings. The City must first determine that "specific economic, legal, technological or other considerations . . . make *infeasible* . . . the *project alternatives* identified in the final EIR." (CEQA Guidelines § 15091, subd. (a)(3).) The second set concerns a statement of overriding considerations, permitting an agency to approve a project despite the existence of significant environmental impacts. (CEQA Guidelines, § 15093.) Because the findings requirements implement CEQA's substantive mandate that public agencies refrain from approving projects with significant environmental impacts when there are feasible alternatives or mitigation measures that can lessen or avoid these impacts, *a lead agency is prohibited from reaching the second set until it has properly*

G-1 Comment noted. This paragraph provides information regarding the content of the letter.

G-2 Because the proposed project will result in one or more unavoidable significant environmental effects, the City must make findings with respect to the alternatives to the proposed project considered in the FEIR; evaluating whether these alternatives could feasibly avoid or substantially lessen the proposed project's unavoidable significant environmental effects while achieving most of its objectives as listed in Section 3.3 of the FEIR.

The City, having reviewed and considered the information contained in the FEIR and the Record of Proceedings, and pursuant to Public Resource Code §21081(a)(3) and State CEQA Guidelines §15091(a)(3), will be required as part of a noticed public hearing before the City Council to make specific findings with respect to the alternatives identified in the FEIR as noted below:

Specific economic, legal, social, technological, or other considerations, including considerations of the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the FEIR.

"Feasible" is defined in Section 15364 of the CEQA Guidelines to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The CEQA statute (Section 21081) and Guidelines (Section 15019(a)(3)) also provide that "other" considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project objectives or on related public policy grounds.

A Statement of Overriding Considerations, pursuant to CEQA Guidelines Section 15093, has been prepared for the consideration of the decision-making body (City Council) and, left to its discretion to determine whether project benefits outweigh any significant unavoidable impacts.

G-2 cont.

addressed the first. (See CEQA Guidelines, § 15091, subd. (f), subd. (c); *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal. 4th 105, 134.)

G-3

These findings must be supported by substantial evidence in the record. (Pub. Res. Code § 21081.5; CEQA Guidelines, § 15091, subd. (b).) Any finding that an alternative is infeasible must not only reflect a reasoned analysis, but must be based on specific and concrete evidence. For example, in *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the court rejected a finding of infeasibility of alternatives based on conclusory assertions of unacceptable cost, noting that:

> "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is *evidence* that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (Id. at p. 1181.)

Only if this finding can properly be made may a lead agency rely on a statement of overriding considerations necessary to approve the Project.

Based on the information provided in the DEIR, substantial evidence does not exist to permit the City to make these required findings. The Reduced Biological Impacts Alternative concededly is feasible and will at least "substantially lessen" the significant impacts of the Project while satisfying all project purposes.

G-4

The Reduced Biological Impacts Alternative is feasible because, as the DEIR acknowledges, it is "generally consistent with the policies of the General Plan and the CPU" and "generally meets the CPU objectives." (DEIR at 1-4) Although this alternative "would not accommodate anticipated population growth to the same extent as the CPU," it would still "meet the goals and objectives of the General Plan and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan (RCP)." (Id.)

This alternative will also "substantially lessen" impacts. In the words of the DEIR:

> "the Reduced Biological Impacts Alternative would be considered environmentally superior because it would preserve more open space and, therefore, result in fewer impacts to biological, archaeological and paleontological resources; hydrology/water quality; human health/public safety/hazardous materials, and utilities (including solid waste), resulting from a decrease in developable land that could be graded. It also would reduce (but not avoid) the significant and unavoidable impacts of the CPU (i.e., air quality (RAQS, stationary sources/collocation), noise (traffic, construction and stationary

G-3 Please refer to Response to Comment G-2.

G-4 Comment noted. The Reduced Biological Impacts Alternative generally meets the CPU objectives. Specifically, this alternative preserves more area in open space and in turn reduces the extent of residential development within areas designated for community commercial and industrial/business park development. This would not however preclude this alternative from meeting General Plan and Community Plan goals relative to mixed-use, transit-oriented communities, but would not achieve the level of density and intensity necessary to support the Community Village goals and objectives that are included in the City's General Plan. Further justification to support adoption of the CPU as stated in the Project Description will be included in the Findings and Statement of Overriding Considerations prepared for the consideration of the decision-making body (City Council) as part of the public hearing process for adoption of the CPU.

G-4 cont.

sources), traffic/circulation, utilities (solid waste), and greenhouse gas emissions." (DEIR at 10-9.)

In sum, because this alternative is feasible, fully accomplishes all Project purposes, and is environmentally superior in virtually all respects CEQA *requires* its adoption.

But even apart from the City's legal obligations, adoption of this alternative makes good planning and policy sense. As an initial matter, it would strengthen the City's adopted MSCP and result in a more robust MHPA. As the DEIR notes:

> "By definition the Reduced Biological Impacts Alternative would increase the acreage of biological sensitive habitat and species preserved throughout the CPU area. This alternative would reduce impacts to coastal sage scrub and maritime succulent scrub habitat, nonnative grasslands, vernal pools and vernal pool species, and burrowing owl habitat within the Southwest Village area. Additionally, mulefat scrub, riparian, and non-native grassland would be preserved within the drainage area west of La Media Road. Preservation of the nonnative grasslands would also reduce impacts and preserve vernal pools and their associated watersheds, as well as, habitat for burrowing owl. Wildlife corridors also would be conserved to a greater extent under this alternative. In addition to increased preservation of the biological resources, this alternative would increase available acreage for restoration of vernal pool and burrowing habitat, provide expanded wildlife linkages, and decrease impacts to critical habitat for San Diego fairy shrimp and Navarretia fossalis." (DEIR at 10-11.)

And, because the reduced development footprint would fully meet project purposes, these *substantial* environmental benefits would not require any sacrifice to economic or planning objectives – a win-win solution.

G-5 FHL accordingly urges the City to adopt the Reduced Biological Impacts Alternative. Should you wish to discuss the contents of this letter further, please feel free to contact the undersigned.

Very truly yours,

Dan Silver, M.D.
Executive Director

G-5 Comment noted.

Letter H



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Vice President
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Pardee Homes
Quality Suites
Sanyo North America
SHARP HealthCare
Smurfit Kappa Orange County
Weingarten Realty Investors
KSWT 12 Televisa / Fox XXX

October 22, 2013

Myra Herrmann
Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Otay Mesa Community Plan Update EIR Comments (30330/304032)

Dear Myra,

On behalf of the Otay Mesa Chamber of Commerce, please find our comments related to the environmental impact report for the Otay Mesa Community Plan update.

H-1

H-2

Public Notice

1. Pg. 2 - The notice only identifies actions relating to the City of San Diego Land Use Element of the General Plan, there will also be amendments to the Economic Prosperity Element of the General plan in order to revise the map of Prime Industrial Lands based on the following General Plan Language: "Amend the boundaries of Figure EP-1 if community plan updates or community plan amendments lead to an addition of Prime Industrial Lands."

H-3

Subject

1. Pgs. 3-9 Conclusions: In the last paragraph, the document fails to identify Health and Public Safety as an unmitigated environmental impact. This conflicts with information in the public notice.

H-4

Executive Summary

1. Pg. S-8, last paragraph, again, Health and Public Safety impacts are not addressed. The PEIR also lacks a table of contents.

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H-1 Comment noted. This paragraph provides information regarding the content of the letter.

H-2 Although not explicitly stated in the public notice, actions associated with adoption of the CPU will include amending the General Plan Land Use Element and the Economic Prosperity Element Prime Industrial Map, Figure EP-1.

H-3 Both the Public Notice and the Conclusions identify Human Health/Public Safety/Hazardous Materials as a significant environmental effect of the project. This impact would be less than significant after mitigation, as described in Section 5.6 of the PEIR, and is therefore, not an unmitigated impact as stated in the comment. Page 3 of the Conclusions states: "With the exception of impacts related to Air Quality (RAQS, Stationary Sources/Collocation), Transportation/Circulation, Noise (Traffic/Stationary Sources), Utilities (Solid Waste), and Greenhouse Gas Emissions, mitigation measures are proposed (Chapter 11) that would reduce Project impacts to below a level of significance." This would include Health and Public Safety and, thus, is not in conflict with the public notice.

H-4 See Response to Comment H-3. Page S-8 accurately characterizes the impacts associated with the Environmentally Superior Alternative which include Air Quality (criteria pollutants, sensitive receptors, stationary Sources/Collocation), Transportation/Circulation (capacity), Noise (traffic, construction and stationary sources), Utilities (solid waste), and Greenhouse Gas Emissions.

A Table of Contents was included in the Draft PEIR and can be found after the Executive Summary and title page (See Pages i-xii).

H-5

Project Description, Section 3

1. Pgs. 3-41, "Allow office, research and development, and optional residential uses in the Business Park-Residential Permitted area and allow optional residential uses with proposals that conform to APCD and HAZMAT adjacency guidelines and regulations." The CPIOZ, which directs conformance with APCD/HAZMAT regulations, is a ministerial process. In addition, it is not the burden of residential development to conform to HAZMAT/APCD regulations, since these regulations would apply to industrial development. Since the collocation standards in the General Plan have not been applied, the statement is false.

H-6

2. Pgs. 3-53, The design considerations listed in section 3.6 and specified in the community plan to reduce or avoid impacts is only applied to CPIOZ B. Therefore, the conditions associated with health and safety impacts of industrial uses on residential uses cannot be applied. This is particularly evident in the BPRP area, where the locations of residential uses are not even specified.

A Programmatic-level EIR is not intended to cover off "projects." The PEIR needs to be more specific in its analysis of the impacts of industrial uses on sensitive receptors (residential) and their impacts related to future development of the BPRP. A program EIR analysis assumes that future development is discretionary thereby examining more specific environmental impacts.

Environmental Analysis, Section 5

Land Use, Section 5.1

1. The PEIR incorrectly concludes that there is no significant land use impacts related to the two significant thresholds identified here. CEQA provides for the identification of significant land use impacts if there are secondary indirect environmental impacts. These associated environmental impacts include but are not limited to those impacts identified in the PEIR as significant, unavoidable, and unmitigated, specifically Air Quality, Noise, Public Health and Safety, and Transportation.

2. "Based on the City's Significance Determination Thresholds, a significant land use impact would occur if the CPU would: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project;"

   The proposed CPU conflicts with the General Plan Land Use, Economic Prosperity, and Noise Elements due to the following:

   a) The Land Use Element of the General Plan directs that "As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and

H-5 Implementation of the CPIOZ is a process for streamlining the subsequent development project review process and does not supersede nor supplant regulatory requirements at the federal, state, or regional level, such as air quality and hazardous material regulatory requirements. The CPIOZ does not direct APCD/HAZMAT compliance. Compliance with outside agency regulations are assured at the building permit stage by providing verification from the regulatory agency that any issues have been adequately addressed.

The policy has been revised to clarify as follows: "…area and allow optional residential uses with **industrial** proposals that conform to APCD and HAZMAT adjacency guidelines and regulations." BPRP is an industrial designation that may include optional residential development opportunity.

H-6 The two CPIOZ overlays are required to ensure protection of sensitive resources, construction of the circulation infrastructure, and conformance with the appropriate policies from the Urban Design Element. The first CPIOZ, Otay Mesa CPIOZ, is an overlay on all commercially and industrially designated and zoned properties except for the approximately 26-acre site that is designated Business Park, Residential Permitted (BPRP). The BPRP 26-acre site would have its own BPRP CPIOZ, and will be required to address the maximum area for residential development within the industrial designated and zoned area, and to ensure conformance with the appropriate policies from the Urban Design Element. Subsequent development projects located within the CPIOZ areas would be reviewed by appropriate City staff at the Process 1 or 2 level, which are considered ministerial, and regulated by Municipal Code Chapter 11 Article 2 Division 5. For Subsequent development projects that are consistent with the CPIOZ Type A requirements, ministerial permits would be processed. For subsequent development projects that are not consistent with the CPIOZ Type A requirements, CPIOZ Type B, a discretionary action, would apply.

Project Description, Section 3

1. Pgs. 3-41, "Allow office, research and development, and optional residential uses in the Business Park-Residential Permitted area and allow optional residential uses with proposals that conform to APCD and HAZMAT adjacency guidelines and regulations." The CPIOZ, which directs conformance with APCD/HAZMAT regulations, is a ministerial process. In addition, it is not the burden of residential development to conform to HAZMAT/APCD regulations, since these regulations would apply to industrial development. Since the collocation standards in the General Plan have not been applied, the statement is false.

2. Pgs. 3-53, The design considerations listed in section 3.6 and specified in the community plan to reduce or avoid impacts is only applied to CPIOZ B. Therefore, the conditions associated with health and safety impacts of industrial uses on residential uses cannot be applied. This is particularly evident in the BPRP area, where the locations of residential uses are not even specified.

H-7 A Programmatic-level EIR is not intended to cover off "projects." The PEIR needs to be more specific in its analysis of the impacts of industrial uses on sensitive receptors (residential) and their impacts related to future development of the BPRP. A program EIR analysis assumes that future development is discretionary thereby examining more specific environmental impacts.

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   The proposed CPU conflicts with the General Plan Land Use, Economic Prosperity, and Noise Elements due to the following:

   a) The Land Use Element of the General Plan directs that "As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and

H-7 The PEIR provide a framework for how subsequent development projects will be processed in the future and provides an analysis of the proposed land uses and implementing actions necessary for implementing the CPU (Section 3.0 – Project Description). The PEIR does not provide the level of analysis necessary to allow subsequent development projects to proceed without additional review for compliance with the Land Development Code. The PEIR does however provide a mitigation framework for subsequent development projects that are subject to discretionary and environmental review in accordance with CEQA. Therefore, the PEIR analysis relative to the collocation of industrial and sensitive land uses is adequate at the program-level.

The PEIR addresses the issues related to the OMCPU, including revisions to the existing land use patterns. The CPU also addresses issues required through the City's General Plan which includes the land use adjacency issues such as industrial lands and sensitive receptors. The CPU provides transitional uses between industrial and residential land uses as discussed in the City's General Plan. In this case, the CPU includes a Zoning Ordinance amendment to create two new CPIOZ overlays which includes a process for streamlining the subsequent development project review process and is thoroughly addressed in the PEIR. In addition, a PEIR need not assume that future development is ministerial or discretionary. Pursuant to CEQA Guidelines Section 15183(a), Projects Consistent with a Community Plan or Zoning, "CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects…"

H-8 The Land Use Section of the PEIR included four (4) Issues for analysis, two (2) of which were determined to be less than significant after implementation of the applicable Mitigation Framework. This analysis did not identify any significant land use impacts associated with the air quality, noise, public health and safety or transportation.

Project Description, Section 3

1. Pgs. 3-41, "Allow office, research and development, and optional residential uses in the Business Park-Residential Permitted area and allow optional residential uses with proposals that conform to APCD and HAZMAT adjacency guidelines and regulations." The CPIOZ, which directs conformance with APCD/HAZMAT regulations, is a ministerial process. In addition, it is not the burden of residential development to conform to HAZMAT/APCD regulations, since these regulations would apply to industrial development. Since the collocation standards in the General Plan have not been applied, the statement is false.

2. Pgs. 3-53, The design considerations listed in section 3.6 and specified in the community plan to reduce or avoid impacts is only applied to CPIOZ B. Therefore, the conditions associated with health and safety impacts of industrial uses on residential uses cannot be applied. This is particularly evident in the BPRP area, where the locations of residential uses are not even specified.

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H-9

2. "Based on the City's Significance Determination Thresholds, a significant land use impact would occur if the CPU would: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project;"

   The proposed CPU conflicts with the General Plan Land Use, Economic Prosperity, and Noise Elements due to the following:

   a) The Land Use Element of the General Plan directs that "As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and

H-9 The proposed Otay Mesa CPU addresses land use considerations across the entirety of the community and to the maximum extent feasible, eliminates conflicts between the land use plan, policies, and regulations within the City's jurisdiction, as required. The criteria provided in the General Plan relative to Economic Prosperity, Noise, and Land Use, were carefully considered during the CPU process.

Specifically, the land use plan does not create conflicts between residential and industrial land uses, as transitional uses such as office uses, are provided. Where noise is anticipated to exceed acceptable standards, uses are generally prohibited (site specific noise analysis is required at building permit stage).

The CARB Guidelines were created to provide local jurisdictions with guidance in addressing air quality issues, where warranted. While the guidelines have not been adopted at the local jurisdiction, it should be noted that they, like most of the air quality standards, are evolving into more stringent polices which may become local laws and policies.

While the BPRP CPIOZ does allow for Process One ministerial projects, it is unknown at this time whether a future development project would meet the requirements for CPIOZ Type A, as no project has been submitted. See Response to Comment H-6 for further information on the CPIOZ process.

H-9 cont. toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc." The CARB guidelines are not referenced in the Community Plan. Site-specific analysis cannot be conducted for the BPRP site, since the permit is ministerial.

H-10 b) The Land Use Element of the General Plan states that "Apply zoning designations that separate industrial and sensitive receptor uses as presented on LU Table 4." The BPRP land use designation does not achieve this separation since the site is in very close proximity to the IBT zone, which permits light industrial, wholesale, and distribution uses that have the capacity to generate toxic air contaminants and hazardous substances.

H-11 c) The Economic Prosperity Element of the General Plan provides policies for commercial and industrial development, which are insufficiently analyzed in the PEIR. See below #2a.

H-12 d) The Noise Element of the General Plan requires adherence to the General Plan Noise Guidelines. Since the BPRP is ministerial, these standards cannot be applied.

H-13 3. "Based on the City's Significance Determination Thresholds, a significant land use impact would occur if the CPU would: Result in the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the CPU, create land use incompatibilities or result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development.

a) The Economic Prosperity Element of the General Plan identifies Otay Mesa as a Sub-regional Employment Area in the General Plan, Appendix C, Figure EP. This section emphasizes Otay mesa's role in the entire region to provide base sector employment. The addition of more than 65,000 residents within the plan area conflicts with this policy. In addition, the following is an excerpt from the appendix related to land use designations and permitting: "Support of infrastructure development and preservation of areas for primarily industrial uses that support manufacturing and international trade activities are essential to provide middle-income job opportunities and contribute to the growth of the City's overall economic base." The large amount of residential and their supporting infrastructure and land uses proposed in the CPU conflict with the adopted General Plan for Otay Mesa's role in the City and entire region.

b) The policies in the General Plan Economic Prosperity Element are intended to protect base sector uses that provide quality job opportunities including middle-income jobs; provide for secondary employment and supporting uses; and

H-10 The properties east of the BPRP are currently developed with office and distribution uses and are designated "Other Industrial" on the Prime Industrial Map. The CPU anticipates that should residential units be developed, they would occur closer to the other residential units planned for the village area directly to the west. The PEIR identifies mitigation to address these uses.

H-11 The Economic Prosperity Element is addressed in PEIR Section 5.1.3.1a. The PEIR concluded that the CPU is consistent with its goals and policies; no land use impact would result. In addition, the PEIR properly analyzes the implementation of BPRP relative to the surrounding IBT land use. The CPU anticipates that should residential development occur, it shall be located close to the proposed village area to the west and not abutting Britannia Blvd., or near the existing uses east of the site. Further, the site is separated from the industrial lands north of I-905. It should be noted that implementation of the Otay Mesa CPU will implement the Economic Prosperity Element of the General Plan and apply the proper industrial land use designations to the community, as well as protect approximately 1,990 acres as Prime Industrial Lands.

H-12 Prior to issuance of any Building Permits for development, acoustical analysis must demonstrate that the proposed use complies with State requirements for internal noise attenuation.

H-13 The comment implies that residential land uses will be intermixed across the planning area; however, the residential land uses are generally located in the western half of the community, thereby separated from the industrial lands to the east of Britannia. The southeastern portion of the planning area is almost exclusively designated for industrial development with supportive commercial and no residential uses.

The existing community plan has a total of 12,400 dwelling units at build out with an estimated population of 45,324. The CPU has a total of 18, 774 dwelling units with a population estimate of 67,035 a difference of 21,711. To say there is an addition of more than 65,000 residents is incorrect. The change in land uses amounts to a 3% reduction in Industrial acreage, with 2% changing to Open Space and 1% changing to Village. The CPU maintains 2,528 acres for industrial uses, and has protected 1,990 acres as Prime Industrial Lands. The CPU implements the Economic Prosperity, Land Use and Housing Elements of the General Plan.

toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc." The CARB guidelines are not referenced in the Community Plan. Site-specific analysis cannot be conducted for the BPRP site, since the permit is ministerial.

b) The Land Use Element of the General Plan states that "Apply zoning designations that separate industrial and sensitive receptor uses as presented on LU Table 4." The BPRP land use designation does not achieve this separation since the site is in very close proximity to the IBT zone, which permits light industrial, wholesale, and distribution uses that have the capacity to generate toxic air contaminants and hazardous substances.

c) The Economic Prosperity Element of the General Plan provides policies for commercial and industrial development, which are insufficiently analyzed in the PEIR. See below #2a.

d) The Noise Element of the General Plan requires adherence to the General Plan Noise Guidelines. Since the BPRP is ministerial, these standards cannot be applied.

3. "Based on the City's Significance Determination Thresholds, a significant land use impact would occur if the CPU would: Result in the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the CPU, create land use incompatibilities or result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development.

a) The Economic Prosperity Element of the General Plan identifies Otay Mesa as a Sub-regional Employment Area in the General Plan, Appendix C, Figure EP. This section emphasizes Otay mesa's role in the entire region to provide base sector employment. The addition of more than 65,000 residents within the plan area conflicts with this policy. In addition, the following is an excerpt from the appendix related to land use designations and permitting: "Support of infrastructure development and preservation of areas for primarily industrial uses that support manufacturing and international trade activities are essential to provide middle-income job opportunities and contribute to the growth of the City's overall economic base." The large amount of residential and their supporting infrastructure and land uses proposed in the CPU conflict with the adopted General Plan for Otay Mesa's role in the City and entire region.

H-14

b) The policies in the General Plan Economic Prosperity Element are intended to protect base sector uses that provide quality job opportunities including middle-income jobs; provide for secondary employment and supporting uses; and

H-14 As stated above, the residential land uses are generally located in the western half of the planning area, while the eastern half of the community is designated industrial with some supportive commercial uses. The CPU implements the General Plan's Economic Prosperity Element Policy EP-A.12 by amending the Prime Industrial Lands to include approximately 1,990 acres in Otay Mesa. The CPU goals and policies are based upon many factors, including a comprehensive evaluation of market analysis, housing needs, and resource protection. Through the CPU's separation of residential and industrial land uses, and its fostering of innovative industrial land uses, implementation of the collocation/conversion suitability factors is demonstrated throughout the CPU. According to Appendix C, EP-2 of the General Plan: Transit Availability- present (bus corridor along Airway Road); No Adjacent Prime Industrial lands; Significance of Residential/Employment Component - only 49% of BPRP land use is allowed to be residential, the mix of uses with technology serves to attract a broader employment base to Otay Mesa; Community Village is adjacent to BPRP, which provides for additional retail and residential uses; Public Health - mitigation requirements in place per PEIR; Separation of Uses - see Table 5.6-1 of PEIR indicating no known hazardous uses nearby.

H-14 cont. maintain areas where smaller emerging industrial uses can locate in a multi-tenant setting. "When updating community plans or considering plan amendments, the industrial land use designations contained in the Land Use and Community Planning Element should be appropriately applied to protect viable sites for base sector and related employment uses".

More specific direction is as follows: "Justification for a land use change must be supported by an evaluation of the prime industrial land criteria in Appendix C, EP-1, and the Collocation/Conversion Suitability factors." Although Table 5.1-11 of the PEIR presents the criteria for determining whether a use is suitable for collocation/conversion, PEIR lacks the required analysis. Though, the PEIR states on pg. 5.1-48 that "Preparation of the CPU considered citywide economic prosperity goals and, based upon a comprehensive evaluation of the General Plan's collocation/conversion suitability factors", there is no evidence in the CPU that this occurred.

H-15 "In industrial areas not identified as Prime Industrial Lands on Figure EP-1, the redesignation of industrial lands to non-industrial uses should evaluate the Area Characteristics factor in Appendix C, EP-2 to ensure that other viable industrial areas are protected". No lands were designated as prime industrial in Otay Mesa because the plan update was underway; therefore, this analysis should be included in the PEIR as part of the land use analysis.

H-16 c) This lack of analysis has resulted in the CPU Land Use Plan, which contains an overconcentration of residential uses in close proximity of industrial uses in the IBT area, particularly in the Central Area. The same wholesaling, distribution, and manufacturing uses in the Light Industrial Designations are permitted in the IBT. As such, this designation cannot serve as a gradual transition of uses often referred to in the PEIR as a means reduced land use conflicts in the CPU. The statement on pg. 5.1-47 of the EIR "to avoid or reduce potential impacts associated with the collocation of residential and industrial uses, the CPU generally focuses lighter, more residentially, compatible industrial uses adjacent to multifamily residential areas, while locating heavier, less residentially-compatible categories of industrial uses to the south and southeast" is false.

H-17 d) Pgs. 5.1-48 of the PEIR states: "Additionally, the Otay Mesa CPIOZ would apply to the areas designated for industrial uses. The CPIOZ would ensure consistency of all future development within these areas with CPU direction and policy, including otherwise future ministerial projects. Since the CPIOZ A (ministerial) in the CPU contains no conditions or language to gauge compatibility, this statement is false. A ministerial project by its nature cannot be subject to general policy interpretation contained in a community plan.

H-18 e) The residential entitlements gained in the Central Area through adoption of the OMCPU, are not adequately analyzed in the PEIR, even given the future Specific Plan process. If the required analysis were undertaken, this issue would result in a

H-15 Each of the General Plan's elements were carefully considered and evaluated during the evolution of the plan update as each community plan must be consistent with the applicable policies of each element of the General Plan. One of the actions of the CPU is to amend the Prime Industrial Lands Map to include approximately 1,990 acres in Otay Mesa.

H-16 The Central Village is only adjacent to IBT on the northern portion and is separated from the IBT by the freeway. Land use policies include providing adequate buffers uses and distance between residential and industrial uses. The CPU implements the policies of the Economic Prosperity Element through clustering industrial uses together and providing land use transitions to the residential areas. These policies include EP-A.1 through EP-A.11.

H-17 The assertion that CPIOZ Type A does not include a policy review is incorrect. The CPU states that CPIOZ Type A is applicable where development is consistent with the CPU as related to certain plan policies. However, it also states that projects inconsistent with said policies are subject to CPIOZ Type B. The CPU provides specific text relative to which policies of the plan apply to CPIOZ Type A. Also see Response to Comment H-6.

H-18 No "residential entitlements" will be granted through the CPU process. The CPU has redesignated two areas with the community as Specific Plan Areas. As stated in the CPU, "in order to comprehensively plan the Southwest and Central Village Areas using the General Plan's City of Villages Strategy, one Specific Plan covering each of the village areas will be required prior to consideration of any comprehensive development and rezoning proposals…Specific plans should be privately sponsored and developed in collaboration with the City of San Diego. Both Specific Plans will be considered amendments to the Community Plan, and must adhere to the City's process for plan amendments and any associated rezoning." A project-level CEQA analysis would be required in conjunction with any future Specific Plan applications and associated entitlements (permits). Therefore, at the program-level, the analysis of the CPU is adequate and the impact conclusions in Chapter 5 of the PEIR are supported.

H-18 cont.

significant unmitigated impact.

H-19

f) The BPRP area is located in close proximity to industrial land use designations, which permit manufacturing, wholesaling, and distribution. Appendix C of The General Plan contains a policy suggesting 1,000 feet between the *property lines* of industrial uses and sensitive receptors or a specific study. The CPU incorrectly interprets the 1,000 ft. as between the uses. The requirement is not part of the CPIOZ A standards.

H-20

In sum, we disagree with the determination that collocation and conversion land use impacts are less than significant since the analysis is not provided in the PEIR. In addition, the ministerial nature of the CPIOZ A designated properties (the majority of the CPU area) does not allow for future environmental review, contrary to numerous statements in Section 5.1 of the PEIR to the contrary. To allow residential uses without future environmental review in this area is also contrary to the Environmental Justice Policies contained in the General Plan.

Air Quality, Section 5.3

H-21

1. This section fails to analyze the health impacts of Diesel Particulate Matter (a known carcinogen) on residential uses per the California Air Resource Board Guidelines, particularly on the residential uses in the Central Specific Plan area and the BPRP site both of which are directly adjacent to the future I-905 freeway. Contrary to the conclusion in the PEIR, this risk is significant.

H-22

2. Pg. 5.3-32 correctly states that "Therefore, impacts related to exposure to air toxics would be significant and unavoidable". However, this conclusion is also bears on the significance of the health and safety and land use issues.

Human Health, Public Safety, Hazardous Materials, Section 5.6

1. Pgs. 5.6-21 incorrectly states that Health and Safety Hazards due to exposure to toxic contaminants (related to Sections 5.3, Air Quality and Sections 5.6.4, and 5.6.5) are reduced to below a level of significance due to mitigation contained in 5.6.5.3 requiring a Phase I site assessment and remediation. This does not mitigate significant air quality impacts. In addition, since the majority of development in Otay Mesa will be in CPIOZ-A (ministerial) this assessment cannot be required. Therefore, this impact is significant and unmitigated.

2. Pgs. 5.6 -22 incorrectly states that a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation) expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials is not significant due to the requirement of future environmental review and discretionary approval to ensure appropriate uses reduce the potential for hazards. As stated above, this is not correct except possibly in the Specific Plan Areas, which does not include industrial uses where the mitigation would most likely apply. This CPU assigns land uses, so a more

H-19 Per Appendix C of the General Plan, the 1,000 foot buffer is suggested if there are hazardous uses identified within a ¼ mile of proposed sensitive receptors. According to Section 5.6 of the PEIR, there are no hazardous uses identified within that distance from BPRP site. Accordingly, the provision for 1,000 feet between property lines is not applicable. Mitigation Framework AQ-4 includes a Health Risk Assessment requirement if sensitive receptors are developed in the buffer areas for the land uses identified in Table 5.3-7 of the PEIR.

H-20 The General Plan Economic Prosperity Element EP.A-11 states "Encourage the provision of workforce housing within employment areas not identified as Prime Industrial Land." Further, the Land Use Element LU.I-10 encourages increased housing opportunities near employment opportunities. While the CPIOZ's allow for Process One and Two ministerial reviews, it is unknown at this time whether subsequent development projects would meet the requirements for CPIOZ Type A, as no projects have been submitted. See Response to Comment H-6 for further information on the CPIOZ process.

H-21 As stated in Section 5.3.5.1b of the PEIR the incremental cancer risk and the chronic hazard index related to traffic-generated diesel exhaust emissions are both less than significant at any modeled receptors. Acute hazards due to diesel particulate matter are also less than significant as stated on page 5.3-25. Both are detailed in Appendix C of the PEIR, the Air Quality Study. The PEIR analyses show that residential receptors could be located within the CPU with less than significant health risk impacts from freeway emissions. The PEIR included an assessment of diesel particulate matter and evaluated the impacts from all roadways in the CPU area that qualify for consideration in the California Air Resource Board's *Air Quality And Land Use Handbook: A Community Health Perspective* (i.e., carried the minimum traffic volumes). This analysis included I-805, I-905, SR-125, Otay Mesa Road, and La Media Road as the primary roadways of concern for exposure to diesel particulate matter.

H-22 Section 5.3.5 of the PEIR clearly identifies a significant unavoidable impact related to air toxics "*associated with the potential collocation of incompatible land uses"*. Section 5.6.3(a) Health Hazards, in the PEIR refers the reader to the discussion of toxic air emissions found in Section 5.3.5 of the PEIR. No additional air toxic impact relative to health and safety or land use has been identified, and therefore, the PEIR is adequate in its analysis and disclosure of the impact.

significant unmitigated impact.

f) The BPRP area is located in close proximity to industrial land use designations, which permit manufacturing, wholesaling, and distribution. Appendix C of The General Plan contains a policy suggesting 1,000 feet between the *property lines* of industrial uses and sensitive receptors or a specific study. The CPU incorrectly interprets the 1,000 ft. as between the uses. The requirement is not part of the CPIOZ A standards.

In sum, we disagree with the determination that collocation and conversion land use impacts are less than significant since the analysis is not provided in the PEIR. In addition, the ministerial nature of the CPIOZ A designated properties (the majority of the CPU area) does not allow for future environmental review, contrary to numerous statements in Section 5.1 of the PEIR to the contrary. To allow residential uses without future environmental review in this area is also contrary to the Environmental Justice Policies contained in the General Plan.

Air Quality, Section 5.3

1. This section fails to analyze the health impacts of Diesel Particulate Matter (a known carcinogen) on residential uses per the California Air Resource Board Guidelines, particularly on the residential uses in the Central Specific Plan area and the BPRP site both of which are directly adjacent to the future I-905 freeway. Contrary to the conclusion in the PEIR, this risk is significant.
2. Pg. 5.3-32 correctly states that "Therefore, impacts related to exposure to air toxics would be significant and unavoidable". However, this conclusion is also bears on the significance of the health and safety and land use issues.

Human Health, Public Safety, Hazardous Materials, Section 5.6

H-23

1. Pgs. 5.6-21 incorrectly states that Health and Safety Hazards due to exposure to toxic contaminants (related to Sections 5.3, Air Quality and Sections 5.6.4, and 5.6.5) are reduced to below a level of significance due to mitigation contained in 5.6.5.3 requiring a Phase I site assessment and remediation. This does not mitigate significant air quality impacts. In addition, since the majority of development in Otay Mesa will be in CPIOZ-A (ministerial) this assessment cannot be required. Therefore, this impact is significant and unmitigated.

H-24

2. Pgs. 5.6 -22 incorrectly states that a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation) expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials is not significant due to the requirement of future environmental review and discretionary approval to ensure appropriate uses reduce the potential for hazards. As stated above, this is not correct except possibly in the Specific Plan Areas, which does not include industrial uses where the mitigation would most likely apply. This CPU assigns land uses, so a more

H-23 The commenter fails to acknowledge the state and federal requirements associated with a business operation using toxic or hazardous materials. Use of such materials requires approval from state and federal regulators and compliance with the associated permits. City issuance of a ministerial permit does not waive the state and federal permit requirements to use or handle toxic or hazardous materials. Compliance with all of these requirements is included in the mitigation requirements. Additionally, the Significance after Mitigation discussion in Section 5.6.3.4 of the PEIR has been revised to include a reference to the Mitigation Framework in Air Quality Section 5.3.5. As concluded in Section 5.3.5.4, impacts related to exposure to air toxics would be significant and unavoidable with the mitigation framework.

H-24 The combination of existing federal, state and local regulations along with adopted GP policies and proposed CPU policies together would result in impacts that are less than significant. Section 5.6.4.2 has been revised to include a summary statement that impacts would be less than significant, consistent with the analysis in Section 5.6.4.1. Also see Response to Comments H-5 and H-6.

H-24 cont. detailed analysis of land use conflicts cannot be deferred to a later date. Although the CPU contains some general measures to avoid impacts at the programmatic level, they will not apply to the vast majority of properties in the CPU area. All land uses are being applied in the CPU now. Additionally, these policies, or any safety mitigation measures, are not included in CPIOZ-A. Therefore, this impact is significant and unmitigated.

H-25 3. Pgs. 5.6-25 (Section 5.6.4.2) *Significance of Impacts* states that improved roadway and transportation modifications reduce the risk of exposure due to spills, etc. The PEIR does not specify what these modifications are and the transportation section only specifies city standards. This section lacks adequate facts to support the conclusion of insignificant impacts. Although the EIR clearly states that residents would be subject to exposure, it wrongly concludes that it is not significant, presumably since there are no schools nearby.

H-26 4. Pgs. 5.6-26 *Significance after Mitigation*, incorrectly states that all projects are subject to discretionary review.

H-27 5. Pgs. 5.6-28 (*Hazardous Sites*) mitigation only requires a Phase I site assessment and remediation for discretionary projects, therefore does not qualify as mitigation for the majority of the OMPCU area.

6. In the Central Specific Plan area and the BPRP site, future residents' ability to evacuate a site in the event of a hazardous incident is highly compromised due to the timing of the Heritage Road/I-905 interchange and associated road improvements which are not scheduled to occur for over 10 years. Due to the lack of discretionary review for the BPRP site (to apply phasing and/or improvement requirements) future residents will be forced to use Britannia Rd., a major truck route to the border crossing. The associated health and safety impacts of mixing trucks with residential traffic are not analyzed in the PEIR.

Noise, Section 5.10

1. Pgs. 5.10-16, *Significance of Impacts-Traffic and Stationary Source Noise* states that, even given project-specific noise abatement, it cannot be guaranteed that future land uses and traffic from those uses would not expose existing and future uses to noise levels in excess of City standards. Therefore, impacts related to noise impacts (exterior and potentially interior) to new residences would be significant and unavoidable.

Even with the proposed mitigation to reduce noise levels such as site-specific acoustical analysis with mitigation measures and adherence to the CPU Acoustical report, it is still significant. However, even these mitigation measures cannot be required unless there is future discretionary review.

Traffic/Circulation, Section 5.12

H-25 The existing roadway system lacks adequate improvements which include unpaved and narrow roads. The planned transportation system includes fully improved and widened roadways that reduce the risk of collisions and spills. The backbone roadway system includes widening the major roadways to four and six lanes. These roadways include Airway, Britannia, and La Media Roads which will provide safer routes for truck traffic and passenger vehicles. Furthermore, the majority of residential development is located in the western half of the community while the industrial area is located in the eastern half of the community. Additionally, Section 5.6.4.2 of the PEIR has been revised to clarify the "modifications" related to the designation of truck routes in Otay Mesa. Also see Response to Comments H-23 and H-24.

H-26 While the BPRP CPIOZ allows for Process One review, and the Otay Mesa CPIOZ allows for Process One and Two ministerial reviews, it is unknown at this time whether subsequent development projects would meet the requirements for CPIOZ Type A, as no projects have been submitted. The Significance after Mitigation (Section 5.6.4.4) has been revised to clarify the process for determining which future development projects are subject to discretionary review. Also see Response to Comment H-6.

H-27 Mitigation Framework Section 5.6.5.3 has been revised to clarify that the process for determining which future development projects are subject to discretionary review, Furthermore; all projects are required to comply with state, federal, and county requirements relative to hazardous sites and materials, regardless of the City review process.

detailed analysis of land use conflicts cannot be deferred to a later date. Although the CPU contains some general measures to avoid impacts at the programmatic level, they will not apply to the vast majority of properties in the CPU area. All land uses are being applied in the CPU now. Additionally, these policies, or any safety mitigation measures, are not included in CPIOZ-A. Therefore, this impact is significant and unmitigated.

3. Pgs. 5.6-25 (Section 5.6.4.2) *Significance of Impacts* states that improved roadway and transportation modifications reduce the risk of exposure due to spills, etc. The PEIR does not specify what these modifications are and the transportation section only specifies city standards. This section lacks adequate facts to support the conclusion of insignificant impacts. Although the EIR clearly states that residents would be subject to exposure, it wrongly concludes that it is not significant, presumably since there are no schools nearby.

4. Pgs. 5.6-26 *Significance after Mitigation*, incorrectly states that all projects are subject to discretionary review.

5. Pgs. 5.6-28 (*Hazardous Sites*) mitigation only requires a Phase I site assessment and remediation for discretionary projects, therefore does not qualify as mitigation for the majority of the OMPCU area.

H-28

6. In the Central Specific Plan area and the BPRP site, future residents' ability to evacuate a site in the event of a hazardous incident is highly compromised due to the timing of the Heritage Road/I-905 interchange and associated road improvements which are not scheduled to occur for over 10 years. Due to the lack of discretionary review for the BPRP site (to apply phasing and/or improvement requirements) future residents will be forced to use Britannia Rd., a major truck route to the border crossing. The associated health and safety impacts of mixing trucks with residential traffic are not analyzed in the PEIR.

H-29

Noise, Section 5.10

1. Pgs. 5.10-16, *Significance of Impacts-Traffic and Stationary Source Noise* states that, even given project-specific noise abatement, it cannot be guaranteed that future land uses and traffic from those uses would not expose existing and future uses to noise levels in excess of City standards. Therefore, impacts related to noise impacts (exterior and potentially interior) to new residences would be significant and unavoidable.

Even with the proposed mitigation to reduce noise levels such as site-specific acoustical analysis with mitigation measures and adherence to the CPU Acoustical report, it is still significant. However, even these mitigation measures cannot be required unless there is future discretionary review.

H-30

Traffic/Circulation, Section 5.12

H-28 As detailed in Section 5.6.1.5, the County Office of Emergency Services (OES) is responsible for: notifying appropriate agencies when a disaster occurs; coordinating all responding agencies; ensuring that resources are available and mobilized; developing plans and procedures for response to and recovery from disasters. Additionally, the City's Emergency Operations Center (EOC), is responsible for maintaining the EOC in a continued state of readiness and coordinating EOC operations when activated in response to an emergency or major event/incident. If an incident involving hazardous materials were to occur in the near-term (until completion of the Heritage Road interchange) evacuation will affect all parties in the area, rather than just residents and the mixing of truck traffic and vehicular traffic on Britannia Boulevard would be short-term and temporary in nature (during evacuation). No health risks would be anticipated from a short-term, temporary condition as noted above. In addition, the specific route of evacuation cannot be determined at this time as each property will be developed independently based on market conditions at the time of application. Also see Response to Comments H-5 and H-6.

H-29 All projects are subject to compliance with the City's noise abatement requirements prior to the issuance of building permits, regardless of whether a ministerial or discretionary permit is required or processed. Therefore, all future buildings will be required to comply with the City's General Plan standards and Municipal Code requirements. While the CPIOZ's allow for Process One and Two ministerial reviews, it is unknown at this time whether subsequent development projects would meet the requirements for CPIOZ Type A, as no projects have been submitted. See Response to Comments H-5 and H-6 for further information on the CPIOZ process.

H-30 Within the CPU, policies 2.4-2, 2.4-7, 2.4-9, and 4.1-17 provide direction for transitional uses for the separation of sensitive receptors to the freeway, truck routes, and industrial uses.

H-30 cont. 1.Pgs. 5.12-42 and 43, state that Traffic Hazards to vehicles and pedestrians are not significant due to adherence to city standards and the provision of transitional land uses. As stated above in Section 5.1, 3c, this transition does not exist.

Alternatives, Section 10.0

H-31 1. Pgs. 10-33, the PEIR incorrectly states that the health and public safety impacts of both the CPU and Reduced Density Alternative are not significant. Since Section 5.3, Air Quality impacts are included in this determination, this impact is significant.

H-32 2. The Reduced Density Alternative does not go far enough to reduce significant impacts such as land use, traffic, air quality, public health and safety, and noise to below a level of significance as required of an alternative per CEQA. This alternative should include the elimination of the BPRP land use area and relocation of land uses which include residential development in the Central Village away from the impacts of the I-905 to the north and from industrial development to the east and south.

H-33 The PEIR as written inadequately addresses the impacts of the OMPCU. As enumerated above, the PEIR allows the application of land uses without proper analysis and mitigation measures. The conclusions of the PEIR are based on a lack of understanding of how they will be applied to future projects as directed in the CPU. In many cases, significance determinations are based on analysis that is lacking or deferred to a later time, but, in fact, will not occur. The introduction of residential uses to Otay Mesa, in the amounts and locations as proposed by the proposed plan, will have significant negative and costly impacts on the businesses trying to operate in Otay Mesa.

H-34 Due to the magnitude of changes, which will have to take place to the PEIR and CPU to meet CEQA guidelines, the OMCC believes both documents will need to be re-circulated for public review.

Thank you for your consideration of this request.

Sincerely,

Alejandra Mier y Teran
Executive Director

CC:
City Councilmembers
Planning Commissioners
Bill Fulton

H-31 Please refer to Response to Comment H-22.

H-32 CEQA requires that a reasonable range of alternatives that reduce or eliminate the significant effects on the environment be evaluated in an EIR. The PEIR provides an analysis of an adequate range of alternatives in Chapter 10.

H-33 This comment asserts that the PEIR inadequately addresses impacts; specifically with respect to collocation and adjacent land uses. This comment is inconsistent with the facts. A zoning ordinance will be adopted in conjunction with the CPU which will provide the mechanism for review of subsequent development projects implemented in accordance with the CPU. All subsequent projects will be subject to review in accordance with CPIOZ for the specific area where it will be located. The Southwestern and Central Village sites will be required to submit applications which include preparation of a Specific Plan subject to discretionary review in accordance with CEQA and the City's Land Development Code. Also see Response to Comments H-6, H-7, and H-18.

H-34 This comment reflects an opinion regarding the amount of revisions anticipated to the PEIR prior to certification. While the information included in this comment is correct regarding the requirements in accordance with CEQA for recirculation of an environmental document if significant new information is added after public review [Section 15088.5(a)(1) through (4)] of the State CEQA Guidelines]. However, in accordance with Section 15088.5(a), new information added to an EIR is "not significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponents have declined to implement. This section of CEQA further defines what constitutes "Significant new information" requiring recirculation. Based on this guidance, the City has determined that the revisions made in the PEIR prior to certification are intended to clarify or amplify or modify language to assist the decision-makers in review of the CPU, which does not meet the definitions of "Significant new information" requiring recirculation. The Draft EIR has not been modified in a way that recirculation of the document is necessary.

Letter I

OMPOA

Otay Mesa Property Owners Association

October 25, 2013

Ms. Myra Herrmann, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: Otay Mesa Community Plan Update. #30330/304032

Dear Ms. Herrmann,

I-1 The Otay Mesa Property Owners Association ("OMPOA") appreciates the opportunity to comment on the adequacy of the Draft Program Environmental Impact Report ("PEIR") for the Otay Mesa Community Plan Update ("CPU"). As you are aware, the OMPOA represents the interests of property owners in the Otay Mesa area of the City of San Diego and meets at least once a month to discuss issues of common concern. A list of these members is included on the final page for your reference. In summary, we support the CPU as proposed and have concluded that with the exceptions noted below, the PEIR adequately discloses and analyzes all potential significant environmental impacts and proposes appropriate mitigation measures.

I-2 In particular, we note the following:

Purpose and Need (Section 3)

As the PEIR points out, the current plan is out of date and the vision many of us shared with the City in 1981 has not been realized. We agree that the changing characteristics of industry, the need for more housing, the need for more middle income jobs and a better understanding of the transportation – land use connection have created a need for a more integrated land use plan.

We further agree that the selected alternative will increase the number of allowed residential units while achieving a more balanced community through integration of housing and appropriate employment lands.

I-3 **Table 3-1 Community Plan Land Use Designations (page 3-32)**

The maximum FAR for the Designation Business Park-Residential Permitted should be footnoted to reflect the same language that is proposed in the implementing zone (IP-3-1) which provides for a 2.0 FAR with the following language:

> "Within the Otay Mesa Community Planning Area, the maximum *floor area ratio* is 0.50 unless a *final map* has been recorded prior to [INSERT the effective date of this ordinance]. This restriction does not apply to residential development in accordance with Section 131.0623(j)."

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San Diego, CA 92108

I-1 Comment noted. This paragraph provides information regarding the content of the letter.

I-2 Comment noted.

I-3 The Final EIR has been revised to reflect the language of the amended Zoning Ordinance relative to the IP-3-1 Zone.

OMPOA

Otay Mesa Property Owners Association

I-4 **Section 5.0 Environmental Impact Analysis:**

There are several references throughout section 5.0 that make reference to the Community Plan Implementation Overlay Zone (CPIOZ) being discretionary in nature. Other parts of the Draft EIR appropriately reference the distinction between CPIOZ A which is ministerial and CPIOZ B which is discretionary.

> *"Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B."*

The following sections delineated in **bold** should be changed or stricken in order to properly reflect the two types of CPIOZ (Ministerial and Discretionary) which will be used to implement the Community Plan. Specifically, Implementation of the Business Park Residential Permitted Land Use designation does not require discretionary review unless it does not comply with the provisions of CPIOZ A.

I-5 • (page 5.1-54 section 5.1.5.1 a.) *"All future projects located within the 100-year flood hazard area as identified in a project-specific drainage study, would be subject to the CPIOZ, **which would ensure discretionary review of all future development within this area.**"*

I-6 • (page 5.6-22 section 5.6.4.1 Impacts) strike the last sentence: *"**In addition, future development would be subject to environmental review and discretionary approval to ensure appropriate uses reduce the potential for hazards.**"*

I-7 • (page 5.6-26 section 5.6.4.4 Significance after Mitigation) strike or modify the second to last sentence:*"Future development would be subject to **discretionary review with subsequent environmental review** to ensure risks are minimized."*

I-8 The document appropriately recognizes that no significant impact has been identified because there are local policies in place (ministerial) that reduce potential impacts to below a level of significance including the example provided: *"For example, disclosure laws require all users, producers, and transporters of hazardous materials to clearly identify materials they store, use, or transport and to notify the appropriate agency in the event of a violation."* Section 6.3.6 of the PEIR (Human Health/Public Safety/Hazardous Materials) provides additional analysis that compliance with either ministerial or discretionary regulations would ensure that no direct or cumulative impacts related to Human Health/Public Safety/Hazardous Materials would result from implementation of the CPU.

I-9 • (page 5.6-27 section 5.7.5.1 Impacts) strike or modify the following sentence: *"All future projects located within the 100-year flood hazard area along Otay Creek, as identified in the CPU drainage study, **would be subject to the CPIOZ, which would ensure discretionary review** of all future development within this area."*

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I-4 See Response to Comment H-6 which provides further clarification on the CPIOZ process.

I-5 Revisions have been made to the text in Section 5.1.5.1.a to clarify the appropriate review process for subsequent development projects implemented in accordance with the CPU.

I-6 Revisions have been made to the text in Section 5.6.4.1 to clarify the appropriate review process for subsequent development projects implemented in accordance with the CPU.

I-7 Revisions have been made to the text in Section 5.6.4.4 to clarify the appropriate review process for subsequent development projects implemented in accordance with the CPU.

I-8 Comment noted. Please also see Response to Comments H-5, H-23 and H-24.

I-9 Revisions have been made to the text in Section 5.7.5.1 to clarify the appropriate review process for subsequent development projects implemented in accordance with the CPU.

OMPOA

Otay Mesa Property Owners Association

I-10 **Policies Referenced**

There are numerous references within the PEIR to design guidelines from the Community Plan. Some of the policies referenced in the PEIR have been modified or deleted in the current draft of the Community Plan. A comparison should be done of the policies referenced in the PEIR for consistency with those that have been modified or omitted from the current draft of the Community Plan. An example of a policy that has been modified in the CPU:

> (PEIR page 5.6-23) reads: "*a. Apply traffic-calming techniques, such as popouts, raised crosswalks, and parkways at truck route intersections with Airway Road and where the truck routes are adjacent to village and park uses.*"
>
> (CPU page UD-9) reads:"*a. Apply traffic-calming techniques that address vehicular/truck and pedestrian movements where the truck routes are adjacent to village and park uses.*"

I-11 **Impacts: Land Use (Section 5.1)**

We concur that the CPU is consistent with SANDAG's Regional Comprehensive Plan and Regional Transportation Plan as well as with the City's General Plan and related ordinances and policies.

We further agree that various policies contained in the CPU will serve to limit incompatibilities at the interface between residential and industrial uses and will promote both a desirable residential community and opportunities for continued industrial development. Finally, we agree with the conclusion that the impacts of collocation as proposed would be less than significant and that no mitigation should be required.

We support the recommended conversion of some industrial land to residential, mixed residential commercial and institutional uses and agree that the impacts would be less than significant and no mitigation will be required.

I-12 **Impacts: Air Quality (Section 5.3)**

We note that emissions will be less than under the adopted plan, that impacts will be less than significant and that no mitigation will be required (5.3-18).

I-13 We have attached for the record a "Review of the Otay Mesa Community Plan Update PEIR Air Quality Section" prepared by Environ. With regard to planned residential development in the CPU, the review references the following conclusions in the PEIR:

- Risks to residents from freeway emissions (specifically diesel particulate matter emissions) are below significance thresholds.
- If the California Air Resources Board Handbook is followed, there will be a less than significant impact in collocating residential land uses with commercial and industrial land

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San Diego, CA 92108

I-10 The Final EIR has been revised to reflect the correct policy language as written in the CPU.

I-11 Comment acknowledged.

I-12 Comment acknowledged.

I-13 Comment acknowledged.

OMPOA

Otay Mesa Property Owners Association

I-13 cont.

uses. Furthermore, if developments of residential land uses occur within the ARB buffer distances mitigation measures have been incorporated into the document, in particular measure AQ-4.

I-14

Finally the Environ review recommends modifying Mitigation Measure AQ-3 which states that:

> "Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared."

I-15

The review points out that this language goes beyond current ARB and APCD rules and regulations and could create an excessive burden on developers of industrial and commercial lands. Thus Environ recommends the following language replace that included in the PEIR:

> "Prior to the issuance of building permits for any facility that would have the potential to emit toxic air contaminants at levels that would subject it to a health risk assessment under SDAPCD Rule 1200, an emissions inventory and health risk assessment shall be prepared."

I-16

Impacts: Population and Housing (Section 5.16)

We concur that while population growth in the community would be substantial, impacts would be less than significant because the CPU would:

- Implement SANDAG's RCP and Regional Housing Element and the City's General Plan and Housing Element by providing a mix of housing types within mixed-use centers linked to public transportation.
- Increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast.
- Focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the RCP and General Plan goals and policies. (5.16-7)

Sincerely,

Rob Hixson
Chairman, Otay Mesa Property Owners Association

cc: Councilmember David Alvarez

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San Diego, CA 92108

I-14 Comment references the text from the analysis. No additional response is necessary.

I-15 Rule 1200 is a regulatory requirement administered by the SDAPCD which is required when an Authority to Construct or Permit to Operate is required, or for which a Notice of Intention or Application for Certification has been accepted by the California Energy Commission. AQ-3 is designed to be broader to provide protection and disclosure for local residents and other air quality sensitive land uses. Additionally, as AB 2588 is a state level regulation and requirement, it supersedes local air district rules and would be required for all uses included under Rule 1200. This is further supported by SDAPCD Rule 1200's requirement that inventory requirements, HRA requirements, and notification comply with the requirements of AB 2588. As the requirements of AB 2588 are incorporated within Rule 1200, no revision is required.

I-16 Comment noted.

OMPOA

Otay Mesa Property Owners Association

Michael and Kaitlin Murphy, Murphy Development Company

Tom Story, Sunroad Enterprises

Mark Rowson, Otay-TJ Ventures, LLC

John Gibson, Hamann Companies

David Wick, National Enterprises, Inc.

Rita Mahoney, ColRich

Joe and Sarah Street, Street Properties

Mel Ingalls, Ingalls Enterprises

Jeff Huttner, Insurance Auto Auction

Hal Ryan, Davisson Trust

Larry Edwards, NAI

Regan Tully, Grubb & Ellis / BRE Commercial

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Letter J

RINCON BAND OF LUISEÑO INDIANS
Culture Committee
1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2622 or (760) 297-2635 & Fax:(760) 297-2639

September 19, 2013

The City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Otay Mesa Community Plan Update, Project No. 30330/304032/SCH No. 2004651076

Dear Myra Herrmann,

J-1 This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Otay Mesa Community Plan Update, Project No. 30330/304032/SCH No. 2004651076. Rincon is submitting these comments concerning your Project's potential impact on Luiseño cultural resources.

J-2 The Rincon Band has concerns for impacts to historic and cultural resources and findings of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. In fact, your project falls within the boundaries of the Kumeyaay Aboriginal Territory. We recommend that you locate a Tribe within the project area to receive direction on how to handle any inadvertent findings according to their traditions and customs. Also, we recommend a Native American Monitor be present during any and all ground disturbances.

J-3 If you would like information on Tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral. If for some reason you are unable to locate an interested tribe please notify us and we will be happy to assist you in the matter. We also request you update your contact information for Rincon and send any future letters and correspondence to the Rincon Tribal Chairman and the Tribal Historic Preservation Officer in the Cultural Resource Center, 1 W. Tribal Road, Valley Center, CA 92082 (760) 297-2635.

J-4 Note that our address has changed. Please update your records to replace the previous address of PO Box 68, Valley Center, CA 92082 with the following address: 1 W. Tribal Road, Valley Center, CA 92082.

Bo Mazzetti	Stephanie Spencer	Steve Stallings	Laurie E. Gonzalez	Frank Mazzetti III
Tribal Chairman	Vice Chairwoman	Council Member	Council Member	Council Member

J-1 Comment noted. This paragraph provides information regarding the content of the letter.

J-2 Comment noted. The Rincon Band of Luiseño Indians received a copy of the Draft EIR along with all federally recognized and culturally affiliated tribal groups in San Diego County. This list was provided to the City of San Diego by the Native American Heritage Commission in accordance with SB 18. At the close of public review, only two comment letters were received: one from the Native American Heritage Commission and this letter from the Rincon Band of Luiseno Indians indicating that the CPU is not within the Luiseno Aboriginal Territory. No other comment letters or requests for consultation were received from San Diego County Native American tribal groups or individuals as a result of this process.

In accordance with the City of San Diego's General Plan Historic Preservation Element and the City's Historical Resources Guidelines Native American monitors are required on all projects within City jurisdiction when significant archaeological resources have been identified, and during all phases of a project that involve either survey or ground disturbing activities on projects. In addition, the City is committed to an on-going relationship with the local Native American community through informal meetings and/or regulatory compliance requirements.

J-3 As stated in the Cultural Resources Report (2013) for the CPU (Appendix E of PEIR), the Native American Heritage Commission (NAHC) was contacted by the City of San Diego in accordance with Senate Bill 18 requirements for community plan updates. A reply from the NAHC indicated that they had no record of Native American religious or sacred sites within the CPU area boundaries. A Native American contact list was provided by the NAHC, and contact letters were sent by the City to the listed parties on February 26, 2007. The City did not receive comments from any federally recognized or culturally affiliated tribal groups within the 90-day period recommended by the NAHC.

J-4 Comment noted. City staff has verified that the address noted in this comment is correct on City records.

RINCON BAND OF LUISEÑO INDIANS
Culture Committee
1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2622 or (760) 297-2635 & Fax:(760) 297-2639

J-5 Thank you for this opportunity to protect and preserve our cultural assets.

Sincerely,

Rose Duro
Rincon Culture Committee Chairman

Bo Mazzetti, Tribal Chairman · Stephanie Spencer, Vice Chairwoman · Steve Stallings, Council Member · Laurie E. Gonzalez, Council Member · Frank Mazzetti III, Council Member

J-5 Comment noted.

Letter K

San Diego County Archaeological Society, Inc.

Environmental Review Committee

24 September 2013

To: Ms. Myra Herrmann
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Otay Mesa Community Plan Update

Dear Ms. Herrmann:

K-1 I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its historical resources appendix, we have the following comments:

K-2 1. On page S-17 of the DEIR, in the box for Mitigation Framework for Prehistoric/Historical Sites, there are references to DEIR Section 5.4. It should be Section 5.5.

K-3 2. In about the middle of page 5.5-24, and the corresponding location on page 50 of the appendix, reference is made to the "San Diego Archaeology Center". The correct name is San Diego Archaeological Center.

K-4 3. On page 5.5-25 of the DEIR and page 51 of the appendix, the sentence beginning "Resources found to be non-significant..." needs to be revised to make it clear that any collections resulting from "survey and/or assessment" are to be curated. Such collections and their analysis have, in fact, mitigated the impacts to such sites.

K-5 4. Mitigation measure HIST-2 in the DEIR (pages 5.5-27 and 28) and the corresponding text in Section 7.2 of the appendix include "f. Removing industrial pollution at the source of production." It is not clear what the intent of this statement actually is. Please clarify.

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

K-1 Comment noted. This paragraph provides information regarding the content of the letter.

K-2 The revision has been made in the Final PEIR.

K-3 The revision has been made in the Final PEIR.

K-4 In accordance with the City's Historical Resources Guidelines, non-significant resource types are defined as isolates, sparse lithic scatters, isolated bedrock milling stations, and shellfish processing stations. Resources found to be non-significant at the survey level do not require any further action beyond documentation in a report prepared in accordance with the Historical Resources Guidelines. Curation is not required for these resource types because they are not classified as "collections" and are generally limited to one isolated artifact, contain a minimal amount lithics and no subsurface component (in the case of sparse lithic scatters) or have no associated surface or subsurface components. All other phases of archaeological evaluation which result in the recovery of artifacts will require curation in accordance with the General Plan and City Historical resources Guidelines.

K-5 This measure was taken directly from the adopted City of San Diego Historical Resources Guidelines. The measure was intended to provide additional protection for historical buildings or structures located adjacent to industrial areas where exhaust or ash from such uses could have an adverse effect on exterior character defining features of a historical building. While the intent of this measure has good merit, the City recognizes that it would be difficult at best to require an adjacent use to stop such activity, unless of course the industrial pollution affecting the adjacent resource is illegal, at which point the appropriate regulatory agency would be contacted to address any violations. With respect to Otay Mesa, the City has determined that this measure is not applicable and had deleted it from Mitigation Framework Measure HIST-2. The City will also consider removing this measure from the Historical Resources Guidelines during a future update process.

K-6

5. Other than the above, we concur in the impact analysis and mitigation measures as proposed.

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: RECON
SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

K-6 Comment noted.

LETTER

Letter L

ColRich

4747 Morena Blvd. • Suite 360
San Diego • California 92117
(858) 490-2300 • Fax (858) 490-2301

October 24, 2013

Ms. Myra Hermann
City of San Diego
Development Services
1222 First Avenue
San Diego, CA 92101

RE: DRAFT PROGRAM EIR OTAY MESA COMMUNITY PLAN UPDATE, PROJECT NO. 30330/304032/SCH. 2004651076

Dear Ms. Hermann,

L-1 CR Otay Canyon Ranch Associates LLC has conducted a review of the Program Environmental Impact Report (PEIR) prepared in support of the pending Otay Mesa Community Plan Update (CPU). In general, the PEIR is a well-written document that appears to meet all applicable California Environmental Quality Act (CEQA) requirements for analysis at the programmatic level. However, we have identified several issues with the Draft PEIR that we request be resolved prior to certification of the document by the San Diego City Council. Our comments are primarily intended to allow future projects to effectively "tier" off of the PEIR as intended, thereby minimizing subsequent CEQA compliance requirements for future Otay Mesa projects.

L-2 1. PEIR Section 3.7 identifies the land use density and intensity methodology or assumptions used throughout the PEIR for evaluating potential impacts to the environment. Although Section 3.7 indicates that the PEIR assumes that "Village" and "Business Park-Residential Permitted" mixed-use designations were based on approximately 50 percent of the maximum density for residential portions of the gross area within these designations, the discussion does not adequately describe what assumptions were made for the "Village" and "Business Park-Residential Permitted" designations. Section 3.7 of the PEIR should be refined to more clearly articulate the maximum percentage of land area within the "Village" and "Business Park-Residential Permitted" that were assumed for residential, commercial, and/or business park uses. Section 3.7 also should more clearly articulate the density/intensity assumptions made for each of these land use categories within the "Village" and "Business Park-Residential Permitted" designations. This revision is intended to allow future implementing projects within the CPU area to effectively tier off of the PEIR document in accordance with CEQA Guidelines § 15168(c).

L-3 2. Table 3-5, *Future Actions*, should be expanded to indicate that the future actions needed from the City of San Diego also include Community Plan Amendments, Specific Plans, and Zone Changes. These future actions are required pursuant to the CPU policies related to the Southwest and Central Village areas.

L-4 3. Figure 5-2.8, *Proposed View Corridors and Gateways*, does not include a legend identifying what the blue asterisks or yellow circles represent. Please clarify the legend.

L-5 4. PEIR Section 5.6.4.2 is intended to discuss the significance of the CPU's impacts due to hazardous substances; however, the text in this section does not indicate the level of significance. The text in this section should be supplemented with a statement that impacts would be less than significant, as is implied by the subsequent sections.

RESPONSE

L-1 Comment noted. This paragraph provides information regarding the content of the letter.

L-2 The methodology used to calculate the number of dwelling units within a Village area for the purpose of CEQA analysis was based on the following calculation:

- 75% of the density range within the applicable land use designation (i.e., neighborhood village = 15-25 du/ac) resulting in 7.5 du/ac
- 7.5 du/ac was added to the low number of the range (in this case 15) resulting in 23 du/ac

The text in Section 3.7 has been modified to reflect the above methodology used for calculating dwelling units as noted above. Including density/intensity assumptions for each land use category at the program level would be speculative.

Assumptions were made for commercial square footages, residential dwelling units and business/industrial uses for the Village and Business Park-Residential Permitted land use designations. However, for the BPRP, CPIOZ implementation will only allow for 49% of the area to be developed with residential units at 15-44 du/ac as indicated in Table 3-1. While the Village area included both commercial square footages and residential dwelling units' assumptions, Specific Plans will be required to provide more detailed information regarding how land uses are sited within the village and will be subject to discretionary and environmental review.

L-3 The PEIR (Table 3-5) has been revised to include these future actions.

L-4 Figure 5.2-8 has been revised to include a complete legend.

L-5 Section 5.6.4.2 has been revised to include a summary statement that impacts would be less than significant, consistent with the analysis in Section 5.6.4.1.

L-6

5. Figure 5.7-2, *Drainage Areas*, depicts the location of the various drainage areas within the CPU area, which presumably are also intended to be described in Table 5.7-1, *Otay Mesa CPU Drainage Areas*. However, the Drainage Areas depicted on Figure 5.7-2 appear to be inconsistent with the drainage areas listed in Table 5.7-1. For example, Figure 5.7-2 identifies the "San Ysidro" drainage area, but there is no "San Ysidro" drainage area shown in Table 5.7-1. Either Figure 5.7-2 or Table 5.7-1 should be revised to resolve this discrepancy.

L-7

6. PEIR Page 5.12-16 indicates that Class II bike lanes should be 6-foot in width. However, per the *City of San Diego Street Design Manual* (Page 59), Class II bike lands should be between 5 and 6 feet in width, and may be 4 feet in width when abutting a mandatory right-turn lane. Please revise the text on PEIR Page 5.12-16 accordingly.

L-8

7. To allow for more effective tiering, specific modeling assumption utilized in the traffic study should be added to PEIR sections 5.2, 5.12, and/or in Appendix J. In order for the traffic study to be more effectively utilized by implementing projects designations and to allow future implementing projects to provide a direct comparison to the PEIR's assumptions and findings, it would be helpful to identify what land use assumptions were made for the various land uses within the CPU, particularly for the "Village Centers" and "Business Park – Residential Permitted" land use. We would appreciate clarity regarding the assumption for the calculation of trips for purposes of the PFFP. Does the City intend to apply the trip rate values shown in the "Trip Generation Rates for Facility Financing Purposes" published by the City which has a differentiation between projects with residential densities of more or less than 20 units per acre?

L-9

8. PEIR Page 5.13-24 states, "The CPU indicates that it is the intent of the City to collaborate with SUHSD on the location of one additional high school to meet increased demand (Policy 2.6-2.d, City of San Diego 2011a). While siting has not yet been determined, the CPU indicates that this facility would be located within the central portion of the planning area, south of Airway Road (see Figure 5.13-1)." There is no future high school facility identified on Figure 5.13-1. Figure 5.13-1 should be revised to identify the conceptual location for this facility.

If you should have any questions regarding any of these comments, please contact me. I can be reached by phone at (619) 818-3575, or by e-mail at rmahoney@colrich.com.

Sincerely,

Rita Mahoney
Project Manager, Colrich
On Behalf of CR Otay Canyon Ranch Associates LLC

L-6 Section 5.7.1 of the PEIR has been revised to ensure consistency among all text, tables and exhibits.

L-7 Page 5.12-16 has been revised accordingly to be consistent with the City's *Street Design Manual.*

L-8 The Otay Mesa PFFP applies the Trip Generation Manual as augmented on Page 13 of the PFFP for the determination of ADTs applicable to non-residential development. The applicability of ADTs to non-residential fees is reflected on the PFFP on the Fee Schedule (Table 2, page 10) and in the Cashflow (Table 5, page 15).

Regarding residential development, while ADT assumptions were used in the derivation of the single-family and multi-family residential fees, the fees are set at fixed values in the PFFP as reflected on the Fee Schedule (Table 2, Page 10). The fees reflect ADT assumptions for single-family and multi-family dwelling units as determined by City staff based on analysis specific to Otay Mesa during the development of the PFFP. As the residential fees are set at fixed values as established in the PFFP (Table 2, Page 10), they are not related to or dependent on the Trip Generation Manual.

L-9 The SUHSD is amenable to siting a high school within either village area or just outside and, therefore, a future high school site is not specifically identified on Figure 5.13-1. However, as part of the Specific Plan process, the City of San Diego and future developers will coordinate with the SUHSD to determine the appropriate location for an additional high school. As such, the following sentence has been deleted from the paragraph as noted on Page 5.13-24:

"While siting has not yet been determined, the CPU indicates that this facility would be located within the central portion of the planning area, south of Airway Road (see Figure 5.13-l)."

Letter M

October 24, 2013

Ms. Myra Hermann, Environmental Planner, and Ms Theresa Millette, Senior Planner

City of San Diego Development Services Center

1222 First Avenue, MS 501

San Diego, CA 92101

SUBJECT: Otay Mesa Community Plan Update. #30330/304032

Dear Ms. Hermann and Ms Theresa Millette,

M-1 Thank you for the opportunity to review the PEIR. The following are our comments and concerns. The comments included in this letter are comments on the land use analysis of the OMCPU Draft PEIR and the Otay Mesa Community Plan Update.

M-2 Request no. 1: There are many useable lots North of the proposed Airway Road alignment just West of Cactus Road. We would like to request that these parcels be included in the Central Village Specific Plan Area. Additionally, we would like to request that the following parcel that I currently own in the same described area, (APN # 646-093-04-00), be included in the Central Village Specific Plan Area. The parcel is flat and useable, has been farmed and cultivated for years, and has no environmental resources on-site or concerns that would otherwise preclude development as part of this Specific Plan area. Attached are some photos for your reference of parcel # 646-093-04-00. Clearly, as evidenced by these photos, this property should not be designated as open space as presently contemplated by the Plan Update.

M-3 Request no. 2: We are also the owners of Ocean View Village (VTM 314829/SDP 320732), an entitled mixed-use project consisting of 143 multi-family residential units, 40,678 square feet of neighborhood commercial, and 37,850 square feet of industrial development. This project was approved by the City Council on December 1, 2008. This project includes a transportation phasing plan requirement that, in order to exceed 107 multi-family units, the construction of the Heritage Road/SR-905 Interchange must be assured to the satisfaction of the City Engineer.

If the construction of only the 108th residential unit in Ocean View Village triggers the need for this Interchange, it would be reasonable to conclude that this Interchange is a "near term" improvement requirement for the entire Otay Mesa Community. Yet, both the Traffic Impact Analysis and the Community Plan Update are silent as to the imminent need for this Interchange Improvement. This omission, when coupled with the City's recent approvals of two other significant projects, Brown Field's Metropolitan Airpark Project and the Cross Border Airport Terminal Project, neither of which required the assurance of the Heritage Road/SR-905 Interchange in the near term, only reinforces the conclusion that the Heritage Road/SR-905 Interchange is no longer a near term improvement requirement.

M-1 Comment noted. This paragraph provides information regarding the content of the letter.

M-2 While the alignment for Airway Road appears to run along the canyon edge as it approaches Cactus Road, the more specific alignment will occur with the submittal of the Specific Plan. It is anticipated that any properties north of any alignment of Airway Road and south of the canyon would be included in the Central Village Specific Plan.

M-3 At this time, amending the permit condition for the Ocean View Village project is not identified as an action for the CPU.

M-3 con

Consequently, based on the updated, more current traffic analysis documentation as contained in the TIA for the Otay Mesa Community Plan Update, together with the TIA's recently prepared and approved for the above referenced projects, it is requested that, as part of the approval of the Otay Mesa Community Plan Update, those projects, such as Ocean View Village, that have an obligation to assure the construction of the Heritage Road/SR-905 Interchange be excused from this improvement as a near term obligation of their developments. Improvements such as the Heritage Road/SR-905 Interchange are included and funded by the FBA program in Otay Mesa and the payment of FBA fees should be sufficient participation in this project.

M-4

Request no. 3: Additionally, there have been three different California State assembly bills that have passed that extend tentative maps. We have not seen any reference to these three assembly bills in the PEIR. Specifically, we would like to see AB 208, AB 333 and AB 116 be included in the PEIR.

Sincerely,

Melvyn Ingalls



APN # 648-093-04-00 at Southeast corner looking to the West (photo taken 10/24/13)

M-4 The assembly bills referenced in this comment are not part of the regulatory framework for the CPU; therefore, they have not been included in the PEIR. Requests for Extension of Time (EOT) are covered by the Subdivision Map Act and implemented in accordance with the provisions of the City's Municipal Code when an EOT application is submitted for review or when new legislative requirements are enacted.



APN # 646-093-04-00 at Southeast corner looking to the North (photo taken 10/24/13)

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LETTER

Letter N



October 25, 2013

Ms. Myra Herrmann, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Otay Mesa Community Plan Update, Project No. 30330/304032 – DEIR Comments

Dear Ms. Herrmann:

N-1 We are in receipt of your Public Notice of a Draft Environmental Impact Report ("DEIR") for the above-referenced project. This letter is in response to your request for comments on the DEIR to be submitted by October 25, 2013.

National Enterprises, Inc. ("NEI") manages approximately 2,200 acres within the City and County portions of Otay Mesa. While we and other Otay Mesa stakeholders support the Community Plan Update ("CPU"), we need to ensure that the policies laid out in the CPU are consistently applied to all projects.

N-2 As such, we noticed that the ***Otay Mesa Community Plan Implementation Overlay Zone*** CPIOZ A contains certain policies that do not apply to the ***Business Park, Residential Permitted Community Plan Implementation Overlay Zone***. These policies cover the following items:

- Create a visual distance from heavy industrial uses or use a buffer zone;
- Connectivity pathway;
- Lively street signs;
- Pathways linking parks;
- Noise barriers or buffers;
- Focus on pedestrian orientation;
- No cul-de-sacs;
- Alternative parking designs.

NATIONAL ENTERPRISES INCORPORATED
[illegible] Drive • Suite 4000 • San Diego, California 92121 • [illegible]

RESPONSE

N-1 Comment noted. This paragraph provides information regarding the content of the letter.

N-2 The Urban Design Element policies within the Otay Mesa CPIOZ include specific policies for both industrial and commercial uses. As such, the commercially-specific policies are not referenced in the Business Park, Residential Permitted CPIOZ because it is an industrially designated and zoned area. The Otay Mesa CPIOZ and the BPRP CPIOZ address the bullet points as follows:

1. Visual distance: With reference to UDE 4.1-9, the BPRP implementing zone allows limited office and research and development uses by right, and is a mixed use designation that would allow for vertical and horizontal mixed use. Any proposal beyond what is allowed by right would trigger discretionary review.
2. Connectivity pathway: UDE policies 4.2-1, 4.2-2 a-c and 4.5-1 apply within both CPIOZ areas.
3. Lively street signs: The CPIOZs do not address street signs.
4. Pathways linking parks: UDE policies 4.2-1, 4.2-2 a-c and 4.5-1 apply within both CPIOZ areas.
5. Noise barriers: The CPIOZs do not address noise barriers.
6. Pedestrian orientation: UDE policies 4.2-1, 4.2-2 a-c and 4.5-1 apply within both CPIOZ areas.

N-2 cont.

- Non-sensitive design;
- Public view opportunities;
- Neighborhood identity required; and,
- No building walls

N-3 Therefore, please ensure that the policies required of CPIOZ A under the ***Otay Mesa Community Plan Implementation Overlay Zone*** are updated to reflect the same policies under the ***Business Park, Residential Permitted Community Plan Implementation Overlay Zone***.

Please let us know if you have any questions.

Sincerely,

David Wick
President
National Enterprises, Inc.
(858) 623-9000, ext. 700
dwick@nalent.com

N-2 cont.

7. No cul-de-sacs: UDE policy 4.2-4 was not applied to the BPRP CPIOZ as the site is currently mapped. Should the owner desire to reconfigure the lots and local streets, that would trigger discretionary action, and CPIOZ B would then apply.
8. Alternative parking designs: UDE 4.2-7 applies to the village areas and specific plans, not the CPIOZ areas. UDE 4.2-8 b and 4.2-9 are applied in both CPIOZ areas.
9. Non-sensitive design: UDE 4.3-1 applies to properties adjacent to canyons and open space. The BPRP property is not adjacent to canyons or open space.
10. Public view opportunities: UDE 4.2-5 applies to both CPIOZ areas.
11. Neighborhood identity required: UDE 4.3-5 applies within both CPIOZ areas.
12. No building walls: The CPIOZs do not address building walls.

N-3 The minor differences between the two CPIOZ areas have been addressed in Response to Comment N-2.

Letter O

SheppardMullin

Sheppard Mullin Richter & Hampton LLP
501 West Broadway, 19th Floor
San Diego, CA 92101-3598
619.338.6500 main
619.234.3815 main fax
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File Number: 0100-092221

October 29, 2013

VIA E-MAIL AND U.S. MAIL

Theresa Millette
Senior Planner
Planning Division
City of San Diego
1222 First Ave, MS 413
San Diego, CA 92101
E-Mail: otaymesaplanupdate@sandiego.gov

Myra Herrmann
Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
E-Mail: dsdeas@sandiego.gov

Re: Comments on Otay Mesa Community Plan Update EIR (Project No. 30330/304032)

Dear Ms. Millette and Ms. Herrmann:

O-1 This firm represents Richard and Margaret Chang (the "Changs"), owners of a thirty-eight (38) acre piece of property along the south side of Airway Road between Britannia Boulevard and Cactus Road (the "Property"). The Changs have been actively involved in monitoring of the Otay Mesa Community Plan Update ("CPU"). We appreciate this opportunity to comment on the CPU and the corresponding program environmental impact report ("PEIR") as these documents relate to the Property. This letter constitutes comments on the land use and other section of the PEIR and attached as Exhibit A are our full comments on the PEIR.

Please note this letter was initially sent on Friday, October 25, 2013. Since then, we have discovered two factual errors: (i) a misstatement of acreage in the third bullet point in the subsequent paragraph, and (ii) a misstatement of the current land use designation in the conclusion. This letter supersedes the letter dated October 25, 2013 and is the operative letter.

O-2 To better serve the City of San Diego ("City") and to be in compliance with the goals and policies articulated in the City General Plan ("General Plan"), instead of the designations proposed under the CPU, described in more detail below, the Property should be designated to incorporate the following possible uses in the various Property areas:

1. Retail uses at the northwest corner (approximately 4.5 acres).
2. Senior Care Facilities or Independent Senior Living at the northeast corner (approximately 10.3 acres).
3. Community Facilities or Public Use Facilities in the middle of the Property along Airway Road (approximately 4.5 acres).
4. Business Park, Hotel and/or Self Storage Facility at the east end of the property (approximately 12 acres).

O-1 Comment acknowledged. This letter supersedes that of the one submitted on October 25, 2013. No additional response is necessary.

O-2 The CPU represents a comprehensive planning effort by evaluating and coordinating a multi-modal transportation network, balancing economic prosperity with housing needs, and coordinating infrastructure financing and phasing with complex land use decisions. The land uses were determined in a public process through the community planning group.

SheppardMullin

Theresa Millette and Myra Herrmann
October 29, 2013
Page 2

O-2 cont.

5. Retail Uses at the corner of Britannia Boulevard and Airway Road (approximately 8.7 acres).

The remainder of the Property, along Britannia Boulevard and Siempre Viva Road, shall be developed as business park and office to maintain consistency with the surrounding areas.

O-3

I. **Surrounding CPU Land Use Designations**

To the south of the Property is seventy-seven (77) acres designated for operational business, as well as six (6) separately owned parcels (ranging from 2.07 acres to 17.37 acres). To the west of the Property is approximately eighty (80) acres proposed for mixed-use development. To the northwest of Property is vacant, unentitled land; while to the northeast are ten (10) entitled, subdivided and recorded industrial lots, known as "Brown Field Technology Park." To the east of Property are existing industrial/business park buildings. Under the CPU, this surrounding area is designated as "Community Village," which allows high density residential up to thirty (30) to thirty-five (35) dwelling units per acre ("du/ac") and related commercial uses. The "Brown Field Technology Park" which is zoned as "Business Park - Residential Permitted" and permits between fifteen (15) and forty-four (44) du/ac.

O-4

II. **Proposed Land Use Designation and Deficiencies in the CPU**

According to the zoning map proposed by the CPU ("CPU Proposed Zoning Map"), the land use designation for the Property would be "Potential Regional Park" for the western portion, while the eastern portion would be being designated as "Business Park - Office Permitted" with an Overlay of "Potential High School Area." These designations are improper and need is unsubstantiated for a number of reasons.

First, there is internal inconsistency between various planning documents. The CPU Proposed Zoning Map designates the Property parcels bounded by Airway Road, Britannia Boulevard, Siempre Viva Road and Cactus Road in the northwest quadrant as the "Potential Regional Park" area, while the "Potential High School" area is still being planned. Alternatively, the "City Planning & Community Investment" version of the proposed Otay Mesa Zoning Map designates the western portion of the Property as "Potential Park Area" and the eastern portion of the Property as "Potential School Area". In addition to this inconsistency, the CPU does not include a clear definition as to the sizes and the locations of the "Potential Park" and the "Potential School" areas. Coupled with the inherent inconsistency, this lack of specificity renders the CPU deficient.

O-5

Second, the Property's "Potential Park" designation is improper as the CPU is not consistent with the General Plan Recreation Goals. Specifically, the General Plan requires developments to "[i]ncrease the amount and quality of recreation facilities and infrastructure though the promotion of alternative methods where development of typical facilities and infrastructure may be limited by land constraints." (General Plan, RE-6).

In contrast, the CPU assumes that every property within the CPU area will not have constraints that would make it impractical to provide population-based parks at the

O-3 This comment provides a summary of existing conditions. No additional response is required.

O-4 The September 2013 draft OMCPU Land Use Map, Figure 2-1, removed the potential high school site from the map and designated that portion of the property Business Park. The community park was reduced to an approximately 36-acre site at the southeast corner of Airway and Cactus Roads. The current draft zoning map was amended to reflect the latest Land Use Map.

O-5 Because Otay Mesa is a developing community, General Plan park standards can be met and park equivalencies were not considered in Otay Mesa during the update process.

O-5 cont. General Plan's 2.8 acres per 1,000 residents. This false assumption leads the CPU to include no flexibility at all for the provision of park equivalent facilities on future projects. Its Policy 7.1-3 states "Provide usable acreage park land required to meet General Plan population-based park standards, *without the use of park equivalencies, and for the sole use as parks*, independent of any shared joint use at Ocean View Hills Elementary School." The City would be required to conduct a site-specific analysis of all the constraints that could possibly interfere with the development of 2.8 net acres of useable park area before it could rule out all future need for use of General Plan permitted park equivalency measures. As discussed throughout the EIR and CPU, the Otay Mesa Community is engaging in the difficult task of collocating residential and industrial uses. The full array of collocation tools, including the ability to move parks and residential facilities farther away from industrial uses though the allow use of park equivalency measures and efficient joint use of school/neighborhood parks. The appropriateness of using park equivalency measures is a right the City Council gave itself in the General Plan when evaluating a site-specific development project that may be constrained in any one of many ways. Page RE-11 of the General plan describes this flexibility as necessary. The specific Recreation Element General Plan policies require it. Accordingly, a community plan update with a policy that removes this discretion for all projects within the community plan area is inconsistency with the General Plan.

In addition to the inconsistencies with the City General Plan's Recreational Element, the CPU, at bare minimum, should have permitted flexibility in reducing the required acreage necessary for parks if development utilized the joint use of parks and multi-story schools. Under such a framework, the reduced park acreage could be provided on the Property, the Property would have an economically viable use, and some of the other concerns identified in this letter would be eliminated.

O-6 Third, as demonstrated in the CPU and corresponding PEIR, Britannia Boulevard will result in an increased Average Daily Traffic ("ADT") and should anticipate very high truck traffic. Therefore, if a potential regional park site or a potential high school site are to be located within the Property, it should not be located near Britannia Boulevard, as such a location would result in increased traffic, noise and air quality impacts. Instead, Cactus Road would be a superior site location for the potential park and high school sites. Neither the CPU nor the corresponding EIR consider such an alternative.

O-7 Fourth, the Land Use of the section of the CPU PEIR is rife with issues and inconsistencies, resulting in an insufficient analysis. Specifically, to be adequate within the perimeters of CEQA the CPU must:

- Add the most recent California Air Resources Board Scoping Plan for statewide reductions of greenhouse gas ("GHG") emissions necessary to achieve AB 32 GHG targets.
- Evaluate the CPU for consistency with General Plan goals and policies. LU-A and LU-B contain policies applicable to Community Plans, including but not limited to LU-A.1(c) , LU-A.5, LU-A.7, LU-A.8, LU-B.1, LU-B.2, Table LU-4, LU-F

O-6 See Response to Comment O-4.

O-7 The CPU was evaluated for consistency with the General Plan's Land Use Element applicable policies in Sections A and B. As indicated in PEIR Section 5.1.3.1, "…the CPU is consistent with and would implement the goals and policies of the Land Use Element of the General Plan and would apply the City of Villages strategy to the setting and needs of the CPU area." The CARB Scoping Plan is discussed in the GHG Section of the PEIR; refer to Sections 5.18.1.3, 5.18.3 and 5.18.4.

No Specific Airport was referenced in the comment. A consistency of analysis of the CPU with operations at Brown Field was conducted. This issue is addressed in PEIR Sections 5.1.3.1, 5.6.3.1, and 5.10.5.

The CPU is a planning document which guides development within the community plan area but it does not entitle any development or ground disturbance that would impact vernal pool resources. Therefore, per the definition of interim projects in Exhibit C of the Planning Agreement, the CPU is not considered to be an interim project since it would not adversely impact vernal pool species and habitat. All future projects would be implemented in accordance with the CPU and would require subsequent environmental review. As discussed in comment O-3, the proposed CPU adds specific policies and recommendations for the protection of vernal pools which currently do not exist in the adopted CPU. Policies 8.1.-1 through 8.1-6 include direction to implement the Environmentally Sensitive Lands regulations, MSCP, and Biology Guidelines.

According to the City's CEQA Significance Thresholds, the focus of environmental analysis should be on the physical impacts of constructing new public service facilities and not response times. At the present time, significance response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal of operations within the affected area because developers cannot be required to fund ongoing operational costs nor can they make budgetary decisions regarding such funding. Developers are required

O-7 cont.

- Analyze the CPU's consistency with operation of this airport and what cumulative impact build-out of the community plan will have on the environment with noise, traffic, hazards created by this existing airport facility.
- The City identified the CPU itself, not just projects within it as a venal pool project subject to the injunction issued by Judge Brewster in October 2006. As part of the Planning Agreement with the United States Fish and Wildlife Services ("USFWS") for processing vernal pool projects during the City-USFWS' new vernal pool Habitat Conservation Plan, the City made its own discretionary projects subject to the Planning Agreement. The CPU is a City-initiated discretionary project subject to CEQA. Therefore, the EIR must demonstrate the CPU's compliance with the Planning Agreement and make the findings required in Subsection C of the Planning Agreement, which include the following:
  - The Project is consistent with the preliminary Vernal Pool Preserve Areas;
  - Provides management and monitoring consistent with the draft Vernal Pool Management Plan;
  - Provides funding in perpetuity for management and monitoring;
  - Consistent with the proposed ESL/wetlands amendments; and
  - Requires MSCP conservation / covenant of easement over any preserved on-site or off-site vernal pools/habitat
- Analyze how police, fire and EMT can reach all parts of the CPU area within the response times identified in the General Plan. City reports on fire service note the difficulty of meeting such standards and recommends changing the response times standards, but the General Plan still uses the "old" response times. If the City Fire Department is going to use the response times recommended in the report to the City, then a General Plan Amendment is required. (See Policy LU-C.1(c).)

O-8

Lastly, an PEIR must include an evaluation of a reasonable range of alternatives (*City of Maywood v. LA Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 421.) The CPU PEIR does not include an alternative that incorporates a reduced number of park acreage and increased acreage under the commercial designation. The CPU PEIR should have specifically considered this alternative as it relates to the Property, which is the environmentally superior alternative. Therefore, the CPU PEIR does not include a reasonable range of alternatives and should be rejected.

III. **Proposed CPU Designation**

O-9

With Britannia Boulevard and Airway Road as the main thoroughfares with high traffic volumes, the potential park and the school sites should not be sited along these two roadways in order to ensure the maximum protection of human safety and welfare while promoting increased traffic and circulation. Instead, the Property along Airway Road from Britannia Boulevard to Cactus Road would best served as a future development corridor area that can utilize the traffic volume to serve the needs of the residents, businesses and industrial uses in the vicinity, while generating more taxes and revenues for the City.

As it relates to the approximately twenty-three (23) acres of "Potential High School Site" sited at the southwest quadrant of the Property, the CPU should designate ingress

O-7 cont. to fund construction of new facilities with DIF and FBA as conditions of project approvals. The City Council adopted new standards in 2011 with a Fire Services Standards of Deployment Study. The new performance measures are being incorporated into a General Plan amendment that is currently in process and anticipated to be adopted at City Council in early 2014.

O-8 CEQA requires that a reasonable range of alternatives that reduce or eliminate the significant effects on the environment be evaluated in an EIR. The OMCPU EIR provides an analysis of alternatives as provided in Chapter 10.

O-9 See Response to Comments O-4 and L-9.

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O-9 cont. and egress routes on Cactus Road or Siempre Viva Road, because both are less congested than Airway Road and Britannia Boulevard. This change would result in reduced environmental impacts, especially noise, traffic and air quality impacts. Additionally, in the event the high school is unnecessary or the size of the school is reduced, the CPU should permit the remainder of the Property to be developed as a business park, compatible with surrounding areas. Moreover, in the event that the size of the proposed park, which is currently designated to be approximately thirty (30) acres, is reduced either through joint use, multi-story schools or other avenues, the CPU should also permit the remainder of the Property under this designation to be developed as a business park.

O-10 **IV. Conclusion**

The Changs have participated and commented throughout the CPU process, and have consistently protested the change from the industrial designation to public use. We have responded to staff's requests for more information and addressed staff's previous concerns. We therefore respectfully request that the City retain implement the requested uses into the CPU.

Sincerely,

John E. Ponder
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:411634605.1

Encl.: Exhibit A: Memo re Draft PEIR Comments, October 25, 2013

cc: Jaw-Min Chang
Bill Fulton, Department of Planning and Neighborhood Restoration
Councilmember Alvarez, City of San Diego

O-10 Comment noted.

EXHIBIT A

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MEMORANDUM

ATTORNEY-CLIENT PRIVILEGE AND ATTORNEY WORK PRODUCT DOCTRINE

To: Myra Herrmann
Theresa Millette
Cathy Winterrowd

Date: October 25, 2013

Cc: Jaw-Min Chang

From: John Ponder, Esq.

File Number: 28PK-162958

Re: Comments on Otay Mesa Community Plan Update Draft Program EIR

O-11 We have reviewed the Draft Program Environmental Impact Report ("PEIR") for the Otay Mesa Community Plan Update ("Project") released for public comment on September 10, 2013 and offer the comments herein. This memorandum provides detailed comments on or questions raised by each individual section of the PEIR. I am available to discuss the specific issues raised below with the City to clarify the meaning of or legal basis for our comments or draft new language for the PEIR.

Page or Figure No.	Section/Heading	Comments
O-12 S-5	Summary of Project Alternatives	The PEIR improperly states that it "considered but rejected the No Project Alternative, the Reduced Biological Impacts Alternative, and the Reduced Density Alternative." This statement reflects an improper delegation of authority to staff and usurpation of the right of the City Council as the final decision-maker to consider a range of reasonable alternatives and determine whether to select or reject the alternatives. The above statement is an admission that the alternatives do not comprise a reasonable range because none of the alternatives are feasible and would substantially reduce a significant impact.
O-13 S-6	S.5.2.2/Reduced Biological Impacts Alternatives	This alternative is the environmentally superior alternative pursuant to CEQA Guidelines section 15126.6 (e)(2). The Reduced Biological Impacts Alternative provides fewer dwelling units as compared to the CPU but still meets the goals and objectives of the General Plan and SANDAG Regional Comprehensive Plan. The lesser intensity of residential use and

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O-11 Comment noted. This paragraph provides information regarding the content of the letter.

O-12 On page S-5 of the PEIR, the document indicates that only the "Vernal Pool and Vernal Pool Conservation Alternative" was considered but rejected. The three alternatives referenced by the commenter were brought forward for detailed consideration as indicated on page S-6 of the PEIR Summary and as detailed in Chapter 10 of the PEIR. An editorial correction has been made in the FEIR.

O-13 Section 15126.6(a) of the State CEQA Guidelines requires the discussion of a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The alternatives evaluated in detail within the PEIR include the: 1) No Project Alternative; 2) Reduced Biological Impacts Alternative; and 3) the Reduced Density Alternative. Each of these alternatives was selected in order to avoid or minimize a significant impact associated with the CPU. These alternatives permit informed decision making and public participation because there is enough variation amongst the alternatives that provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the CPU while also meeting at least some of the project objectives.

ATTORNEY-CLIENT PRIVILEGE AND ATTORNEY WORK PRODUCT DOCTRINE

Page or Figure No.	Section/Heading	Comments
		the fewer number of commercial developments allowed for in this alternative minimally reduces impacts related to traffic congestion. Impacts to visual resources, hydrology/water quality, and energy conservation are also less when compared to the CPU. Because this alternative would increase the amount of open space in close proximity to development, the risk from wildfire would be slightly greater, but would still be mitigated through strict compliance with the Landscape Standards and Brush Management Regulations contained in the LDC. This alternative generally meets all the project objectives but would not accommodate future population growth to the same extent as the CPU. In addition, the PEIR should include an Economically Feasible Alternative, which would analyze a CPU that presents economically feasible land uses for all landowners. For example, if the City applied policies of park and recreation joint use and equivalencies for the Chang property, the underlying land use would be developable and economically feasible.
3-1 to 3-3	Purpose and Need	The PEIR's project description is flawed because it does not have a stable temporal scope. On page 3-1, the PEIR states that the CPU is "intended to define new strategies for the way Otay Mesa would develop and function over the next 20-50 years." On page 3-3, the PEIR states that the CPU addresses "present and future trends through 2030." Neither of these descriptions accurately encompass the Project's temporal scope as stated in the CPU itself. The CPU states that there is a "15 to 20-year planning period addressed by this plan." (CPU, at I-3.) The public and decision-makers have no way of knowing the true scope of the project, and whether the environmental analysis accurately reflects that scope. By the very language of the PEIR and CPU, the scope of the project could end anywhere from 2028 to 2063.
3-3	Relationship to General Plan	It is unclear whether the PEIR bases its analysis on the current General Plan. Only the General Plan adopted in 2008 is referenced, despite the fact that there have been three significant amendments since then, in 2010 (Land Use and Community Planning Element, Public Facilities, Services, & Safety Element; Recreation Element; and Glossary), 2012 (Conservation Element), and 2013. The City of San Diego adopted a General Plan Amendment on March 4, 2013 when it approved the General Plan Housing Element 2013-2020. The current proposed GPA for the CPU and the Housing Element GPA recently completed should have been considered comprehensively rather than in two separate, smaller pieces. This

O-13 cont.

O-14 According to the public review draft Community Plan (September 2013), the planning horizon for the CPU is an assumed buildout of 2062. The PEIR project description has been revised to clarify the accurate scope of the planning horizon.

O-15 The PEIR bases its analysis on the current General Plan which includes all amendments after the 2008 adoption, including the 2013 Housing Element.

The 2013 Housing Element Update was a city-wide update of the General Plan Housing Element and includes no land use or circulation changes. As part of the General Plan, the CPU is required to be consistent with the Housing Element, as with all other General Plan Elements. As detailed in Section 5.16 of the PEIR, the CPU provides land uses and policies consistent with the goals of the City-wide Housing Element including those related to housing types and affordability. The Housing Element serves as a policy guide to address the comprehensive housing needs of the City of San Diego. It is intended to be an integrated, internally consistent and compatible statement of policies for housing in the City. The Housing Element reflects the planning efforts that are currently in process Citywide.

Furthermore, each CPU is a separate action that is also a General Plan Amendment. This is not considered segmenting for the purpose of CEQA.

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Page or Figure No.	Section/Heading	Comments
		inappropriate project segmentation serves to diminish the true impacts of the Project, especially regarding housing impacts. (See e.g. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438.) In addition, since community plans are components of the General Plan, the City should comprehensively analyze all reasonably foreseeable community plan amendments. The City is concurrently processing or has recently approved many General Plan Amendments through community plan updates: San Ysidro, Barrio Logan, Uptown, North Park, and Golden Hill, among others. San Ysidro is especially noteworthy because it is immediately adjacent to Otay Mesa. Dividing the GPAs into multiple CEQA actions is improper segmentation of a project under CEQA and serves to diminish and mask the true impacts of the overall City project of amending the General Plan. The CPU's cumulative impact analysis should address the impacts of the other GPA
3-53	Table 3-6: Summary of Project Design Considerations	The PEIR should revise the following sentence with regard to landform alteration/visual quality: "Future projects would be required to adhere to the CPU land use and development design guidelines." The words "to adhere to" should be replaced with "to be consistent with" or "to be compatible with" because strict adherence to every design guideline is not required and is not the purpose of the guidelines. Guidelines are not binding. The statement is factually inaccurate because there is no legal requirement for future projects to "adhere" to the design guidelines. Because it is factually inaccurate, the PEIR cannot take credit for avoiding or reducing environmental impacts due to it. The same comment applies to the other guidelines mentioned in the same table. The listing of "project design considerations" that future projects will be required to implement is improper deferral of mitigation under CEQA. The City cannot defer its obligation to formulate and adopt mitigation until a more specific development plan is proposed. (*Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433.) The list in this table evidences that the formulation of precise mitigation measures is feasible at this time, but the City is simply deciding to defer their formulation and adoption by calling them "project design considerations." Even if the mitigation measures are general, as are the "project design considerations" listed, the City must devise and approve them along with the certification of this PEIR. (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296.)

O-15 cont.

O-16

O-16 Table 3-6 is not intended to serve as mitigation, but is provided to illustrate a compilation of environmental/regulatory compliance requirements of the CPU, including land use planning, policies or other implementation mechanisms. The compliance measures listed in the table are by definition already part of "the project" as defined by the CEQA Guidelines. A mitigation framework for future projects is provided within each issue section of Chapter 5 in the PEIR. Regarding the statement under "Landform Alteration/Visual Quality", Table 3-6 has been revised to state that future projects will be required to demonstrate compliance with the CPU land use and development design guidelines.

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Page or Figure No.	Section/Heading	Comments
5.1-1	Table 5.1-1	The percentages listed for the land use distribution total 102%. This is a significant error considering that the total Commercial uses are listed as 1.85%.
5.1-7	Table 5.1-2	The PEIR should add most recent CARB Scoping Plan for statewide reductions of GHG necessary to achieve AB 32 GHG targets.
5.1-9	Table 5.1-3	The PEIR should evaluate CPU for consistency with General Plan goals and policies. LU-A and LU-B contain policies applicable to community plans, including but not limited to LU-A.1(c) , LU-A.5, LU-A.7, LU-A.8, LU-B.1, LU-B.2, Table LU-4, LU-F.
5.1-9	Table 5.1-3	LU-G policies are focused on consistency with ALUCP. The City identifies the Tijuana Airport as part of the existing condition/surrounding land uses. PEIR should analyze the CPU's consistency with operation of this airport and what cumulative impact build-out of the CPU will have on the environment with noise, traffic and hazards created by this existing airport facility. See also figures 5.1-4, 5.1-5 and 5/1-6 comparing noise and safety zones for Brownfield, but not the Tijuana Airport.
5.1-35	Vernal pool lawsuit	The City identified the CPU itself, not just projects within it as a venal pool project subject to the injunction issued by Judge Brewster in October 2006. As part of the Planning Agreement with the USFWS for processing vernal pool projects during the City-USFWS' new vernal pool HCP, the City made its own discretionary projects subject to the Planning Agreement. The CPU is a City-initiated discretionary project subject to CEQA. Therefore, the EIR must demonstrate the CPU's compliance with the Planning Agreement and make the findings required in Subsection C of the Planning Agreement, which include the following: • The Project is consistent with the preliminary Vernal Pool Preserve Areas; • Provides management and monitoring consistent with the draft Vernal Pool Management Plan; • Provides funding in perpetuity for management and monitoring; • Consistent with the proposed ESL/wetlands amendments; and • Requires MSCP conservation/covenant of easement over any preserved on-site or off-site vernal pools/habitat.

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O-17 Table 5.1-1 has been updated to reflect the correct percentages of land use distribution for CPU.

O-18 The currently approved CARB Scoping Plan, including all updates is discussed in Section 5.18.1.3 and was addressed in the GHG analysis of the PEIR.

O-19 An analysis of the CPU's consistency with General Plan goals and policies are summarized in Section 5.1.3.2 of the FEIR.

O-20 The Tijuana Airport is located in Mexico and is not subject to federal, state, or local regulation and does not require an ALUCP. Figure 4 of the Noise Technical Report identifies the noise contours for Tijuana Airport. Open Space and Industrial land use designations are within the 65 db CNEL and are consistent with the General Plan's Noise Element compatibility guidelines. Traffic trips associated with the Tijuana Airport are included in the CPU transportation modeling and analysis by incorporating the POE traffic and the Cross Border Facility land uses.

O-21 The CPU is a planning document which guides development within the community plan area but it does not entitle any development or ground disturbance that would impact vernal pool resources. Therefore, per the definition of interim projects in Exhibit C of the Planning Agreement, the CPU is not considered to be an interim project since it would not adversely impact vernal pool species and habitat. All future development projects would be implemented in accordance with the CPU and would require subsequent environmental review. The proposed CPU adds specific policies and recommendations for the protection of vernal pools which currently do not exist in the adopted CPU. Conservation Element Policies 8.1.-1 through 8.1-6 include direction to implement requirement established in the Environmentally Sensitive Lands regulations, the MSCP SAP, and the Biology Guidelines.

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Page or Figure No.	Section/Heading	Comments
5.1-41	Public Facilities Element	The PEIR must analyze how police, fire and EMT can reach all parts of the CPU area within the response times identified in the General Plan. City reports on fire service note the difficulty of meeting such standards and recommends changing the response times standards, but the General Plan still uses the "old" response times. If the City Fire Department is going to use the response times recommended in the report to the City, then a General Plan Amendment is required. (See Policy LU-C.1(c).)
5.1-41	Recreational Element	The CPU is not consistent with the General Plan Recreation Goal to "[i]ncrease the amount and quality of recreation facilities and infrastructure though the promotion of alternative methods where development of typical facilities and infrastructure may be limited by land constraints." (General Plan, RE-6.) In contrast, the CPU assumes that every property within the CPU area will not have constraints that would make it impractical to provide population-based parks at the General Plan's 2.8 acres per 1,000 residents. This false assumption leads the CPU to include no flexibility at all for the provision of park equivalent facilities on future projects. CPU Policy 7.1-3 states "Provide usable acreage park land required to meet General Plan population-based park standards, *without the use of park equivalencies, and for the sole use as parks*, independent of any shared joint use at Ocean View Hills Elementary School. The City would be required to conduct a site-specific analysis of all the constraints that could possible interfere with the development of 2.8 net acres of useable park area before it could rule out all future need for use of General Plan permitted park equivalency measures. As discussed throughout the EIR and CPU, the Otay Mesa Community is engaging in the difficult task of collocating residential and industrial uses. The full array of collocation tools, including the ability to move parks and residential facilities farther away from industrial uses though the allowed use of park equivalency measures and efficient joint use of school/neighborhood parks. The appropriateness of using park equivalency measures is a right the City Council gave itself in the General Plan when evaluating a site-specific development project that may be constrained in any one of many ways. Page RE-11 of the General Plan describes this flexibility as necessary. The specific Recreation Element General Plan policies requires it. Accordingly, a community plan update with a policy that removes this discretion for all projects within the community plan area is inconsistency with the General Plan. We note that the PFFP for the Center City area also does not contain any park equivalency standards and downtown San Diego

O-22 An analysis of how police, fire and EMT can reach all parts of the CPU area within the response times identified in the General Plan is included in the PEIR in Chapter 5.13, Public Services. The Public Facilities Financing Plan (PFFP), which implements the CPU, identifies the facilities that would be necessary to serve build out of the CPU area and meet the City's response time goals.

According to the City's CEQA Significance Thresholds, the focus of environmental analysis should be on the physical impacts of constructing new public service facilities and not response times. At the present time, significance response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval n by the City Council of the affected department's budget proposal of operations within the affected area because developers cannot be required to fund ongoing operational costs nor can they make budgetary decisions regarding such funding. Developers are required to fund construction of new facilities with DIF and FBA as conditions of project approvals. The City Council adopted new standards in 2011 with a Fire Services Standards of Deployment Study. The new performance measures are being incorporated into a General Plan amendment that is currently in process and anticipated to be adopted at City Council in early 2014.

O-23 Because Otay Mesa is a developing community, General Plan park standards can be met and park equivalencies were not considered for Otay Mesa during the update process.

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Page or Figure No.	Section/Heading	Comments
		is clearly a constrained community. There appears to be a bias against park equivalencies required by the General Plan in planning documents put forth to the City Council for approval regardless of whether a community plan area is known to be constrained or may have parcels within it that are constrained. This is an appropriate time for the City to establish park equivalency standards and include them in the CPU and Center City PFFP.
5.1-42	Noise Element	The CPU is not consistent with the City's Noise Element because it admits that it cannot guarantee the buildout of the Community Plan will avoid significant and unavoidable impacts to existing developed areas. Therefore, including CPU policy 9.2-2 requiring that projects "demonstrate that required noise levels for individual development projects within Otay Mesa are considered compatible with the General Plan Noise Land Use Compatibility Guidelines" would seem to set the stage for future claims that individual projects are not in conformance with the Community Plan noise policies. The City Council can determine whether or not the CPU is overall consistent with the General Plan, but the purpose of the EIR is to identify where there are inconsistencies so the City Council and the public are aware the inconsistency exists.
Figure 5.2-1	Photo Location Map	The PEIR's visual impact analysis identified in this figure does not show sufficient viewpoints of the impacts of buildout of the CPU on either existing or planned trails identified in the CPU trail map located on page RE-9. The General Plan's Urban Design Element Policy UD-A.3.l. states: "Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a national backdrop to the open space systems. For example, development should not be visible from canyon trial set the point the trail located nearest to proposed development. Lines-of-sight from trials or the open space system could be used to determine compliance with this policy." Likewise, the PEIR states that views of the CPU area are limited from existing trails within the Otay Valley Regional Park. This does not address what the line of sight would look like from these trails at their nearest point to the CPU area's development. Accordingly, under the analysis method supported by the General Plan, there is insufficient evidence to support the PEIR's conclusion that there would not be a significant impact to the visual quality of views from public viewing areas. At a minimum the PEIR should identify the impact as potentially significant at Section 5.2.3 and include a mitigation measure requiring future development to perform an analysis of the impact

O-23 cont.

O-24

O-25

O-24 The Mitigation Framework is intended to provide the methodology and protocol for review of subsequent development projects to assure compliance with all applicable regulations of the Municipal Code, General Plan and CPU policies. It would be speculative at best to analyze each individual parcel, which is why Noise was identified as an unavoidable environmental impact. Additionally, although the CPU establishes land use designations, it cannot determine at the program-level specifically how an individual development will be sited on a particular parcel. Therefore, analysis of the CPU at the program-level requires that individual development projects demonstrate compliance with GP and CPU at the project-level. This does not constitute an inconsistency with the General Plan; rather, this assures consistency for subsequent development projects.

O-25 Large portions of the open space and MHPA lands are privately owned. The Specific Plans for the villages would provide the further analysis and design for any trails within the specific planning area and would include input from the wildlife agencies. As part of the subsequent development review process for the Specific Plans and trail plan, ASMDs would be identified.

Per policy 3.4-2, trail alignments at the program-level are conceptual and trails outside of the specific planning areas would require subsequent environmental review and coordination with the wildlife agencies. Otherwise, at such time that the City beings the process for acquisition of lands for the MHPA and open space, an NRMP, which would include ASMDs, would be completed.

LETTER

ATTORNEY-CLIENT PRIVILEGE AND ATTORNEY WORK PRODUCT DOCTRINE

	Page or Figure No.	Section/Heading	Comments
O-25 cont.			of project on the nearest point to the trail system and establish a performance standard such projects would be required to meet in order to mitigate such future visual impacts to below a level of significance.
O-26	5.2-17	Proposed Designated Public Views	While the analysis of views of the open space areas, particularly the existing designated resources at OVRP is encouraging, the City's significance threshold is based on the view blockage from designated open spaces areas and parks. (See Section 5.2.2.)
O-27	5.3-19	5.3.4.1 a Construction Emissions	The PEIR identifies that it cannot predict the exact number and timing of future development projects. If three large projects are in construction at the same time, then it would appear that the threshold would be exceeded for ROG and NOx. Please analyze the feasibility of a mitigation measure whereby the City tracks the number of large projects under construction at the same time to avoid exceeding the construction thresholds.
O-28	5.3-20	Construction Emissions	CEQA prohibits the analysis of hypothetical projects. In addition, no parameters are given to define a large project.
	5.3-23	AQ-1	CEQA requires mitigation measures to be feasible and to reduce significant impact even if they cannot be reduced to below a level of significance. Here, AQ-1 identifies a menu of Best Available Control Measures without analyzing whether or not they are feasible and without stating what numerical daily emissions standard (performance standard) the City is required to achieve to provide such partial mitigation.
	5.3-24	AQ-2	CEQA requires mitigation measures to be enforceable and feasible and to reduce significant impacts even if they cannot be reduced to below a level of significance. Here, AQ-2, simply identifies that a future project will have to analyze all reasonable mitigation measures and identifies buffers as a potentially feasible mitigation measure. The City should analyze and provide a matrix of the buffer distance needed to achieve a certain level of air quality emission reduction. As discussed earlier, the fact that a particular project may be required to implement large buffers to achieve feasible reductions in significant air quality impacts is a reason why the City cannot assume that all land in Otay Mesa is unconstrained. Accordingly, the City cannot remove the flexibility needed to meet park standards through park equivalency features.

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RESPONSE

O-26 Section 5.2.2 provides an overview of the City's significance threshold. The City's complete Significance Determination Threshold (2011) relative to visual resources (views) is based on several criteria, including:

a. The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program.

b. The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan.

c. The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area;

d. The project would have a cumulative effect by opening up a new area for development, which will ultimately cause extensive view blockage. Please refer to the City's adopted Significance Determination Thresholds (2011).

The analysis in Section 5.2.3.1 adequately reflects the above significance threshold.

O-27 The comment is correct and due to these uncertainties, the impact was determined to be significant. The request for a tracking procedure is noted, however, the development of a tracking procedure of projects within the City is not part of the CPU. No revisions are required.

O-28 The project is not a hypothetical project; it is an example of a project that can be developed within the community plan area under the current and proposed land use regulations. The parameters of the project are included in the Air Quality Technical Analysis (Section 6.1.1) as part of Appendix C to the EIR.

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		of project on the nearest point to the trail system and establish a performance standard such projects would be required to meet in order to mitigate such future visual impacts to below a level of significance.
5.2-17	Proposed Designated Public Views	While the analysis of views of the open space areas, particularly the existing designated resources at OVRP is encouraging, the City's significance threshold is based on the view blockage *from* designated open spaces areas and parks. (See Section 5.2.2.)
5.3-19	5.3.4.1 a Construction Emissions	The PEIR identifies that it cannot predict the exact number and timing of future development projects. If three large projects are in construction at the same time, then it would appear that the threshold would be exceeded for ROG and NOx. Please analyze the feasibility of a mitigation measure whereby the City tracks the number of large projects under construction at the same time to avoid exceeding the construction thresholds.
5.3-20	Construction Emissions	CEQA prohibits the analysis of hypothetical projects. In addition, no parameters are given to define a large project.
5.3-23	AQ-1	CEQA requires mitigation measures to be feasible and to reduce significant impact even if they cannot be reduced to below a level of significance. Here, AQ-1 identifies a menu of Best Available Control Measures without analyzing whether or not they are feasible and without stating what numerical daily emissions standard (performance standard) the City is required to achieve to provide such partial mitigation.
5.3-24	AQ-2	CEQA requires mitigation measures to be enforceable and feasible and to reduce significant impacts even if they cannot be reduced to below a level of significance. Here, AQ-2, simply identifies that a future project will have to analyze all reasonable mitigation measures and identifies buffers as a potentially feasible mitigation measure. The City should analyze and provide a matrix of the buffer distance needed to achieve a certain level of air quality emission reduction. As discussed earlier, the fact that a particular project may be required to implement large buffers to achieve feasible reductions in significant air quality impacts is a reason why the City cannot assume that all land in Otay Mesa is unconstrained. Accordingly, the City cannot remove the flexibility needed to meet park standards through park equivalency features.

O-29

O-30

O-29 Best practices, in this case referred to as best available control measures, are currently available for use and required on projects subject to air permits and are feasible for use on future development projects. The effectiveness of any specific technology is based on the process and the actual emission rate. Therefore, it would be speculative to attempt to quantify the specific emission reduction from these technologies. As these measures will be assessed for each project at the time a specific project is proposed, additional technologies may be available that achieve greater reductions than the current technologies or best practices used today.

O-30 Air quality mitigation can vary greatly depending on the land use. Thus, the proposed mitigation measures require the implementation of all feasible measures to reduce emissions as the specific developments are not known at the programmatic level. As stated in the EIR, "Mitigation measures AQ-1 and AQ-2 shall be implemented to reduce project-level impacts. These measures shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws." Therefore, mitigation measures AQ-1 and AQ-2 will be refined for specific developments and as specific equipment controls or other restrictions can be identified. Similarly, the precise distance from any given source to a location where emissions would drop to less than significant is highly dependent on the location, pollutants, rate of emissions, height of emission, and meteorological conditions, to name just some of the necessary parameters used to develop buffer distances. Therefore, any specific proposed measures or buffers determined at the program level would be speculative.

The requirement to reduce potential cancer risks to 10 in 1,000,000 or less is similar to the APCD's permit requirements. However, APCD could allow greater risk under its permits. Therefore, the City has provided mitigation that would not allow development of land uses that create a risk of greater than 10 in 1,000,000. The City would not issue a building permit to allow development of these uses, thereby avoiding the impact.

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		CEQA requires mitigation measures to be enforceable and when the details of mitigation are deferred into the future, the lead agency is required to identify a performance standard and an explanation of the evidence to support that implementation of common mitigation measures options will be effective in achieving the performance standard. Here, the mitigation measure requires an applicant that cannot meet the 10 per 1,000,000 toxic air contaminant threshold to submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within 5 years of the date of the plan. Assuming the plan would need to achieve the 10 per 1,000,000 performance standard, the PEIR is inadequate because it does not give the public or the City decision-makers any evidence to support what types of mitigation measures could be included in such an audit/plan and why those measures would be effective in achieving the performance standard. Accordingly, without additional analysis, AQ-3 is the type of deferred mitigation that violates CEQA.
5.4-45	5.4.4 1/Impacts	Impacts to unique, rare, endangered, sensitive or fully protected species of plants or animals would occur with the implementation of the CPU. These impacts are significant and unavoidable. Despite the severity of these impacts, the PEIR does not provide feasible mitigation measures or options in violation of CEQA to even partially mitigate the impacts.
5.4-46	5.4.4 1(a)/ Impacts to Sensitive Plants	Implementation of the CPU has the potential to impact 17 sensitive plant species known to occur within the CPU footprint. Despite this knowledge and the admittance that this is a significant impact at the program-level, the PEIR states that evaluation and mitigation will occur at the project level. The impacts and corresponding mitigation should have been evaluated at the program-level and not deferred to subsequent projects because the program level is the opportunity to address cumulative impacts to these species. Use of the tiering procedure, as is being accomplished here, does not permit the lead agency to defer an analysis of reasonably foreseeable significant environmental impacts to a later stage of review to avoid addressing those impacts in a first-tier EIR. (CEQA Guidelines § 15152(b).) While tiering allows the lead agency to defer analysis of some of the details of later phases of long-term projects until they come up for approval, CEQA's information disclosure requirements are not satisfied by simply asserting that information will be provided in the future. (*Santa Clarita Org. for Planning the Env't v. County of L.A.* (2003) 106 Cal.App.4th 715,

O-30 cont.

O-31 As stated in Section 5.4 of the PEIR, impacts to sensitive plant and animal species are potentially significant. As this is a programmatic EIR, site specific impacts and mitigation for future projects cannot be identified. Instead, the PEIR provides a detailed mitigation framework that all future projects, which have the potential to impact such resources, must follow. Compliance with the mitigation framework in the PEIR, along with community plan policies and existing federal, state and local regulations would ensure that all impacts are mitigated to below a level of significance at the program level. With this foundation, future projects must demonstrate how the specific mitigation will be accomplished before a project can be approved. If a project cannot demonstrate mitigation, it would be determined to be inconsistent with the CPU, thus requiring a Supplemental EIR.

O-32 Please refer to the Response to Comment H-6 which provides further details regarding the CPIOZ review process for subsequent development projects implemented in accordance with the CPU (CPIOZ Type A). Additionally, for projects that cannot comply with CPIOZ Type A, CPIOZ Type B submittal would be required along with subsequent discretionary review in accordance with CEQA.

The PEIR adequately serves its role as a disclosure document and clearly identifies potential impacts to sensitive plant and wildlife species from implementation of the CPU. CEQA Guidelines Section 15168(c), states that "subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or Negative Declaration. If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the EIR, and no new environmental document would be required." Consistent with the above, the PEIR provides a detailed mitigation framework that would be implemented by all future projects that could potentially result in site-specific impacts to biological resources.

Cumulative impacts to plant and wildlife species are addressed in the PEIR (refer to Section 6.3.4). The mitigation framework in the PEIR, along with CPU policies and existing regulations provide adequate assurance that future development projects would not result in a cumulatively considerable contribution to biological resources impacts.

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		723.) A significant environmental impact is ripe for evaluation in a first-tier EIR when it is a reasonably foreseeable consequence of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." (*L.A. Unified Sch. Dist. V. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1028.). The impacts and corresponding mitigation should have been evaluated at the program-level and not deferred to subsequent projects because the program level is the opportunity to address cumulative impacts to these species.
5.4-48	5.4.4.1(b)/Impacts to Sensitive Wildlife	Implementation of the CPU has the potential to impact 28 sensitive wildlife species known to occur within the CPU area. Despite this knowledge and the admittance that this is a significant impact at the program-level, the PEIR states that evaluation and mitigation will occur at the project-level. The impacts and corresponding mitigation should have been evaluated at the program-level and not deferred to subsequent projects because the program level is the opportunity to address cumulative impacts to these species. Use of the tiering procedure does not permit the lead agency to defer an analysis of reasonably foreseeable significant environmental impacts to a later stage of review to avoid addressing those impacts in a first-tier EIR. (CEQA Guidelines § 15152(b).) While tiering allows the lead agency to defer analysis of some of the details of later phases of long-term projects until they come up for approval, CEQA's information disclosure requirements are not satisfied by simply asserting that information will be provided in the future. (*Santa Clarita Org. for Planning the Env't v County of L.A.* (2003) 106 Cal.App.4th 715, 723.) A significant environmental impact is ripe for evaluation in a first-tier EIR when it is a reasonably foreseeable consequence of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." (*L.A. Unified Sch. Dist. V. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1028.). The impacts and corresponding mitigation should have been evaluated at the program-level and not deferred to subsequent projects because the program level is the opportunity to address cumulative impacts to these species.
5.4-57	5.4.4.3/Mitigation Framework	The PEIR inappropriately defers mitigation measures for impacts to sensitive plants and wildlife to subsequent projects. The PEIR states "Adherence to the recommendations below is anticipated to minimize impacts to sensitive biological resources." This mitigation is impermissibly deferred, as it does not set performance criteria or

O-32 cont.

O-33 Please refer to the Response to Comments O-31 and O-32.

O-34 Please refer to Response to Comments O-31 and O-32.

The Mitigation Framework provided in Section 5.4 of the PEIR establishes the framework, methodology and protocol through which future development would be reviewed in accordance with the CPIOZ. This requirement for conducting site-specific biological survey, identify appropriate mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan (SAP) and preparing a report for staff review. "Performance criteria" for applicable mitigation is established in the City's adopted Biology Guidelines and the MSCP SAP, both of which are specifically referenced in the mitigation framework. Mitigation measures BIO-1, BIO-2, BIO-4 and LU-2 as described in Section 5.4, Biological Resources, address impacts of future development projects relating to sensitive plant and wildlife species.

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		demonstrate how the impact can be mitigated. Instead, the PEIR merely puts off the analysis for a later date. It also does not explain what evidence supports the statement that these measures could achieve a performance standard.
5.4-64	5.4.6/Sensitive Habitat	Impacts to Tier I, II, IIIA and IIIB habitats would be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. The mitigation is impermissibly deferred, as it does not set performance criteria or demonstrate how the impact can be mitigated. Instead, the PEIR merely puts off the analysis for a later date.
5.4-66	5.4.7/MSCP	Implementation of the CPU would introduce land uses adjacent to the MHPA. This is a potentially significant impact at the program-level. However, the PEIR states the mitigation measures will be mitigated at a project-level. The CPU identifies permissible land uses adjacent to the MHPA; therefore, the PEIR impermissibly defers mitigation as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." Additionally, the PEIR does not set performance criteria or demonstrate how the impact can be mitigated. Instead, the PEIR merely puts off the analysis for a later date.
5.4-70	5.4.9/Wetland Impacts	Approximately 1,266 vernal pools (12.34 acres) are located within the CPU area. Of this total, 522 are basins with fairy shrimp (12.24 acres). Implementation of the CPU has the potential to impact up to 2.95 acres of vernal pools and .07 acres of basins with fairy shrimp. Impacts to vernal pools would require deviation from the City's ESL Regulations. The PEIR identifies the location of such basins; therefore, the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." However, the PEIR defers this analysis for subsequent project. Additionally, the PEIR does not set performance criteria or demonstrate how the impact can be mitigated. Instead, the PEIR merely puts off the analysis for a later date.
5.4-71	5.4.9.3/ Mitigation Framework	The EIR improperly concludes that project compliance with ESL guidelines will mitigate biological impacts to below a level of significance. The 1997 Implementing Agreement with the USFWS for the MSCP program contemplated that the City would identify a

O-34 cont.

O-35 Please refer to Response to Comments O-31, O-32, and O-34.

O-36 Please refer to Response to Comments O-31, O-32, and O-34.

O-37 Please refer to Response to Comments O-31, O-32, and O-34.

O-38 Comment noted. Staff has reviewed the text in the Mitigation Framework (Section 5.4.9.3) and cannot find any reference to a regional funding source for maintenance of open space lands dedicated to the City. This is not an issue that is discussed in the OMCPU or FEIR. Based on discussion with MSCP staff, funding for maintenance of City-owned open space is a regional issue and not specific to any one community planning area.

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		regional funding source for maintenance of open space lands dedicated to the City. The Implementing Agreement and federal "no surprises" policy prohibits the City from seeking the maintenance funds from the affected landowners because the landowners are already giving up 75% of their development rights on their property within the MSCP and donating it to the City. If the MSCP and ESL's assumption that it will be effective in mitigating biological impacts is predicated on the City obtaining the necessary funds to main the biological values on the dedicated land within the MSCP, then there is a significant and unmitigated biological impact from build-out of the CPU with no corresponding Statement of Overriding Considerations that the impact is acceptable and it is infeasible for the City to raise the maintenance funds from the public or obtain them from landowners who are protected against further exactions by the Implementing Agreement and federal "no surprises" policy.
5.4-75	5.4.9.4/ Significance after Mitigation	The PEIR states it cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Because the extent of future development is unknown at this time, the degree of impact and applicability, feasibility and success of these measures cannot be accurately predicted for each specific project at this time. Therefore, direct and/or indirect impacts to wetlands, jurisdictional resources vernal pools and vernal pool species are considered significant and unavoidable at the program-level. However, the PEIR identifies a substantial amount of information that would permit a more comprehensive analysis. The PEIR should not defer analysis or mitigation of these potential impacts.
5.4-75	5.4.10/Noise Generation	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 the MHPA. Temporary/or permanent noise impacts to wildlife would be significant. The mitigation is impermissibly deferred, as it does not set performance criteria or demonstrate how the impact can be mitigated. Instead, the PEIR merely puts off the analysis for a later date.
5.5-28	5.5.3.4/ Significance after Mitigation	There are 262 recorded historic and prehistoric sites/structures recorded within the CPU area boundaries. 126 known sites that remain within the CPU area have not been impacted by development. Due to the number and density of prehistoric and historic cultural resources in the CPU area, the loss of these resources would be considered a significant impact at the program level.

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O-38 cont.

O-39 Comment acknowledged. The Significance after Mitigation statement noted in Section 5.4.9.4 was incorrect in the Draft EIR. This error was found by City staff after the document was released for public review and has since been corrected to reflect that implementation of the Mitigation Framework detailed in BIO-4 would serve to reduce impacts to wetlands, vernal pools, and other jurisdictional water resources to below a level of significance.

O-40 Please see Responses to Comments O-31, O-32, and O-34.

O-41 Section 5.5.3.1 clearly states that "based on the development footprint of the CPU, future development would have the potential to significantly impact all or a portion of 61 of these sites and any additional unrecorded sites." This is identified as a significant impact at the program-level.

The mitigation framework provided in Section 5.5 of the PEIR establishes the framework, methodology and protocol through which future projects that have the potential to impact historical resources would complete the necessary site-specific surveys and identify the appropriate site-specific mitigation given the results of those surveys. "Performance criteria" for that mitigation are established in the City's adopted Historical Resources Guidelines and Historical Resources Regulations, both of which are specifically referenced in the mitigation framework.

As described in Section 5.5.1.2(d), the City conducted a consultation with Native American Tribes in compliance with SB 18. Please also see Response to Comment E-4.

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		The PEIR acknowledges that the location of these sites can be determined. Therefore, there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The PEIR impermissibly defers analysis and mitigation as the mitigation should have been evaluated at the program-level and not at the project-level as done in the PEIR. The City must also comply with all tribal consultation requirements and the PEIR should discuss that consultation. SB 18 (Chapter 905, Statutes of 2004) requires cities and counties to contact, and consult with California Native American tribes prior to amending or adopting any general plan or specific plan, or designating land as open space.
5.6-7	Table 5.6-1	The PEIR omits analysis of properties of environmental concern located in Mexico. The PEIR "should evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions" including conditions emanating from Mexico. (CEQA Guidelines § 15126.2(a).) The PEIR omits analysis of aircraft hazards from Rodriguez Airport, which is immediately adjacent to the project boundary and highly likely to make adjacent development in the CPU susceptible to hazardous conditions.
5.6-17 to 5.6-19	Wildfire Hazards	There is no analysis of potential impacts of the Project on wildfire, such as whether the Project will increase the likelihood of starting a wildfire by bringing additional people into the area – sparks from backyard barbecues, cigarettes, portable fireplaces, etc.
5.6-17 to 5.6-19	Health Hazards	There is no analysis of the impact of the Project, by bringing additional land uses and corresponding health hazard, on the environment. Instead, the PEIR only analyzes impacts of the existing environment on the Project. The purpose of an EIR is to evaluate the impacts of the project on the environment rather than the impacts of the environment on the project. (*Ballona Wetlands Land Trust v. City of L.A.* (2011) 201 Cal.App.4th 455, 474.)
5.7-23 to 5.7-24	Runoff – Significance After Mitigation	The PEIR inappropriately concludes that there are no significant drainage impacts based on a statement that future projects will be required to comply with applicable regulation at that time. A determination that regulatory compliance will be sufficient to prevent significant adverse impacts must be based on a project-specific analysis of potential impacts and the effect of regulatory compliance, not programmatic analysis as is the case here.

O-41 cont. While the CPU area is within close proximity to Tijuana (TIJ) Airport (Rodriguez Field) which is located across the U.S/Mexico border, future development projects implemented in accordance with the CPU would be subject to all applicable design and operation requirements related to public health and safety (including considerations regarding airport operations). In addition, projects would also be required to demonstrate compliance with the requirements of the Municipal Code, state and federal health and safety requirements and applicable General Plan and CPU policies to assure that no significant health and safety impacts related to airport proximity would result from future development within the CPU area.

O-42 The PEIR includes an analysis of wildfire hazards in Section 5.6.3.1: "because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact." Mitigation (HAZ-1) would reduce these impacts to less than significant.

O-43 The issue statement included in Section 5.6.4 "Hazardous Substances" states, "*Would the CPU create a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation)?*" The analysis discloses that there are several uses permitted under the CPU that would use or dispose of hazardous materials. Existing federal, state, and local regulations and procedures pertaining to the handling, storage, and transport of potentially hazardous materials would apply to all future development within the CPU area. The PEIR concludes that adherence to these regulations would ensure that no significant impact would occur from the existence of such uses.

O-44 The PEIR concludes in Section 5.7.3 that impacts associated with runoff would be less than significant because of compliance with the mitigation framework provided in the PEIR, which requires that all subsequent development projects implemented in accordance with the CPU demonstrate compliance with all applicable local, state and federal requirements, including, but not limited to the City's Storm Water Standards.

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		(*Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1.) This comment applies to all PEIR determinations of less than significant impacts based on presumed regulatory compliance for future projects.
5.6-11	5.8.1.2/Geologic Hazards	Subsurface exploration and laboratory testing would be necessary as future development extends into those areas or any other areas where deep alluvial deposits are encountered. However, the PEIR identifies where these deposits occur. Therefore, the PEIR impermissibly defers evaluation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level and not at the project-level as done in the PEIR.
5.8-16	5.8.3.1/Impacts	Portions of the CPU area are underlain by undocumented fill, colluvium/topsoil and alluvium. These soils are typically loose, dry, and contain rubble, and are unsuitable for support of settlement structures. The CPU should avoid development in these areas. Moreover, the PEIR identifies where these deposits occur. Therefore, the PEIR impermissibly defers analysis and evaluation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level and not at the project-level as done in the PEIR.
5.8-17	5.8.4.2/ Significance of Impacts	Based on the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPU area, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys. The CPU should avoid development on these areas or identify what mitigation (with performance standards) is required to allow development. Moreover, the PEIR identifies where the soil erosion has potential to occur. Therefore, the PEIR impermissibly defers evaluation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level and not at the project-level as done in the

O-45 cont.

O-46 Geotechnical issues are site specific, and pursuant to the City's Seismic Safety Study and Municipal Code, are addressed through the recommendations established in a project-specific geotechnical or soils report submitted during review of grading plans or as part of the ministerial grading permit process. The CPU identifies potential geologic hazards within the CPU area and provides a mitigation framework to address these conditions in conjunction with future development. This mitigation is detailed in Section 5.8.3.3 of the PEIR.

O-47 Please see Response to Comment O-46.

O-48 Geotechnical issues are site specific, and pursuant to the City's Seismic Safety Study and Municipal Code, are dealt with through the recommendations established in a project-specific geotechnical report. The CPU identifies potential geologic hazards within the CPU area and provides a mitigation framework to address these conditions in conjunction with future development. The CPU identified mitigation (Geo-2) for future development in areas that are highly susceptible to erosion.

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		PEIR.
5.10-1	Noise	The EIR improperly restricts its analysis to impacts only from land uses within the CPU footprint, and excludes analysis of uses outside the CPU planning area that could create significant impacts.
5.10-16	5.10.3.2/ Significance of Impacts	Exterior and potentially interior traffic noise impacts are anticipated at the majority of the locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road; therefore, impacts related to new residences would be significant. There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. This is a potentially significant impact of the CPU. These impacts will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.10-21	5.10.4.2/ Significance of Impacts	The CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts at this program-level analysis. The program-level impacts related to noise from stationary sources will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.10-24	5.10.6/ Construction Noise	The EIR fails to identify construction noise from one phase of development to another, instead stating that noise impacts will be determined and mitigated on a project-by-project basis.
5.10-25	5.10.6/ Construction Noise	Future development associated with implementing the CPU has the potential to exceed applicable construction thresholds at residential properties adjacent to construction sites. Additionally, there is the potential for construction noise to Bell's vireo, coastal California gnatcatcher, raptors, and other sensitive species, if they are breeding or nesting in adjacent MHPA lands. These impacts are significant at the project level. These impacts will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.12-22	5.12.3/Capacity	A total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impacts all of these

[illegible] -14-

O-49 The EIR properly analyzes impacts from the proposed project on the environment and to proposed new land uses within the project site. Specific noise conflicts in other community plan areas are addressed in the appropriate community plan or in the City's General Plan.

O-50 While unshielded exterior use areas may be exposed to noise levels in excess of the clearly compatible noise levels, current construction techniques and materials are capable of achieving greater exterior to interior noise reductions than in previous years. Based on currently available design standards, construction techniques, and materials, exterior noise levels in excess of 70 CNEL can reduce noise at interior locations to below 45 CNEL. Thus, subsequent analysis will be sufficient to meet the City and state interior noise level standards.

O-51 All future development is required to comply with the City noise ordinance, which limits noise from stationary sources between properties. If a land use does not comply with the City's noise ordinance, the land use can be cited and eventually shut down. The property line limits are applicable to all uses within the City, whether the interface is residential/ commercial, residential/ industrial, commercial/ commercial, commercial/ industrial, or industrial/ industrial.

O-52 The analysis of construction noise, Section 5.10.6.1, identified the range of potential construction noise from various equipment used in construction and determined that while the City regulations limited construction noise, due to difference in potential projects the effectiveness of these regulations cannot be adequately determined at the program-level and the impact was found to be significant. As construction noise is primarily generated by diesel powered engines and is relatively consistent between construction phases, it was further determined that subsequent development projects, implemented in accordance with the CPU would be required to prepare an acoustical analysis demonstrating compliance with the City' Noise Ordinance.

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		PEIR.
5.10-1	Noise	The EIR improperly restricts its analysis to impacts only from land uses within the CPU footprint, and excludes analysis of uses outside the CPU planning area that could create significant impacts.
5.10-16	5.10.3.2/ Significance of Impacts	Exterior and potentially interior traffic noise impacts are anticipated at the majority of the locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road; therefore, impacts related to new residences would be significant. There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. This is a potentially significant impact of the CPU. These impacts will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.10-21	5.10.4.2/ Significance of Impacts	The CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts at this program-level analysis. The program-level impacts related to noise from stationary sources will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.10-24	5.10.6/ Construction Noise	The EIR fails to identify construction noise from one phase of development to another, instead stating that noise impacts will be determined and mitigated on a project-by-project basis.
5.10-25	5.10.6/ Construction Noise	Future development associated with implementing the CPU has the potential to exceed applicable construction thresholds at residential properties adjacent to construction sites. Additionally, there is the potential for construction noise to Bell's vireo, coastal California gnatcatcher, raptors, and other sensitive species, if they are breeding or nesting in adjacent MHPA lands. These impacts are significant at the project level. These impacts will be significant and unavoidable. The CPU should avoid development in these areas or identify what mitigation (with performance standards) is required to allow development.
5.12-22	5.12.3/Capacity	A total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impacts all of these

O-53

O-54

[illegible] -14-

O-53 The comment is correct that future construction activities in close proximity to sensitive receptors may exceed established noise thresholds. However, noise from and specific activity is a localized phenomenon which affects relatively short distances. As many conditions affect the assessment of noise, at this stage of development and design, i.e. program-level, determining the significance and severity of impacts at a project level is speculative. This is further supported by the many methods available for reducing noise levels from construction activities, including but not limited to, barriers, equipment restrictions, as well as distance. Noise impacts to wildlife and habitat are discussed in sections 5.10.6.1 and 5.4.10 of the EIR.

O-54 The impacts of the CPU to specific roadway segments, including their future LOS condition, are clearly identified in Section 5.12.3.1 of the PEIR and were evaluated at the program-level. No feasible mitigation beyond the design features already included in the Mobility Element of the CPU have been identified. The EIR has been revised to provide further clarification on impacts associated with roadway segments and feasibility of mitigation. This issue is also further addressed in the draft Findings and Statement of Overriding Considerations for the project. The EIR does not violate the stated General Plan policy. As subsequent development projects implemented in accordance with the CPU are submitted for review, project-specific traffic analysis will be required and measures identified to reduce impacts at the project-level. While the program-level conditions cannot be fully mitigated, implementation of project-level improvements will serve to improve such conditions including the provision for providing sidewalks that meet City Engineering standards; maintenance of which is the responsibility of the applicable asset manager (City department) and is dependent upon appropriate funding.

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		24 roadway segment locations. This impact is significant and unavoidable. The PEIR identifies the failing roadway segments, but impermissibly defers evaluation and mitigation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level and not at the project-level as done in the PEIR. The CPU violates General Plan Policy ME-C.4 (Improve operations and maintenance on City streets and sidewalks) and ME-C.8 (Implement Traffic Impact Study Guidelines that address site and community specific issues)
5.12-30	5.12.3/Capacity	A total of 48 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition. Therefore, the CPU would have a significant impact to all 48 of these intersections. This impact is significant and unavoidable. The PEIR identifies the failing intersections, but impermissibly defers evaluation and mitigation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level and not at the project-level as done in the PEIR. The CPU violates General Plan Policy ME-C.4 (Improve operations and maintenance on City streets and sidewalks) and ME-C.8 (Implement Traffic Impact Study Guidelines that address site and community specific issues)
5.12-30	5.12.3/Capacity	Five SR-905 freeway ramps would be expected to experience freeway delays with downstream freeway operations and unacceptable levels in the Horizon Year Plus CPU condition. This impact is significant and unavoidable. The PEIR identifies the failing freeway ramps, but impermissibly defers evaluation and mitigation of this impact as there are reasonably foreseeable consequences of the action proposed for approval and the agency has "sufficient reliable data to permit preparation of a meaningful and accurate report on the impact." The mitigation should have been evaluated at the program-level

O-54 cont.

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O-55 The impacts of the CPU to specific roadway intersections, including their future LOS condition, are clearly identified in Section 5.12.3.1 of the PEIR. No feasible mitigation beyond the 10 intersection lane configurations presented in the PEIR has been identified. The EIR has been revised to provide further clarification on impacts associated with roadway intersections and feasibility of mitigation. This issue is also further addressed in the draft Findings and Statement of Overriding Considerations for the project. The EIR does not violate the stated General Plan policy. As subsequent development projects implemented in accordance with the CPU are submitted for review, project-specific traffic analysis will be required and measures identified to reduce impacts at the project-level. While the program-level conditions cannot be fully mitigated, implementation of project-level improvements will serve to improve such conditions including the provision for providing sidewalks that meet City Engineering standards; maintenance of which is the responsibility of the applicable asset manager (City department) and is dependent upon appropriate funding.

O-56 The impacts of the CPU to specific freeway ramps are clearly identified in Section 5.12.3.1 of the PEIR. Due to the uncertainty associated with implementing freeway ramp improvements, and uncertainty related to implementation of TDM measures, the freeway ramp impacts associated with the CPU would remain significant and unavoidable at the program-level. The EIR has been revised to provide further clarification on impacts associated with specific freeway ramps and feasibility of mitigation. This issue is also further addressed in the draft Findings and Statement of Overriding Considerations for the project. The EIR does not violate the stated General Plan policy. As subsequent development projects implemented in accordance with the CPU are submitted for review, project-specific traffic analysis will be required and measures identified to reduce impacts at the project-level. While the program-level conditions cannot be fully mitigated, implementation of project-level improvements will serve to improve such conditions including the provision for providing sidewalks that meet City Engineering standards; maintenance of which is the responsibility of the applicable asset manager (City department) and is dependent upon appropriate funding.

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		and not at the project-level as done in the PEIR. The CPU violates General Plan Policy ME-C.4 (Improve operations and maintenance on City streets and sidewalks) and ME-C.8 (Implement Traffic Impact Study Guidelines that address site and community specific issues).
5.13-9	Parks and Recreation	The PEIR's analysis of Public Services impacts is inadequate with respect to parks and recreation. The CPU is inconsistent with the Recreation Element of the General Plan because the update precludes the City Council from considering park equivalencies when they review individual projects. Contrary to the clear statements in the General Plan Recreation Element where the City Council stated flexibility to use park equivalencies is needed where a property is constrained and that a Community Plan Update is an appropriate place for the City to establish its Park Equivalency Standards, the CPU dismisses the entire park equivalency process on the theory that the entire community plan area is not constrained land. There is no explanation why Otay Mesa is not and never could be constrained land. A developable parcel in Otay Mesa could be constrained for many reasons – biology, noise, preservation of prime industrial lands and the need to design projects sensitive to these lands using collocation technique are all significant sources of constrains that could make it difficult for a parcel to meet both park acreage requirements and minimum density requirements without the use of flexible tools such as park equivalencies. Now is the perfect time for the City Planning Department to create the park equivalency standards because the Planning Department is also bringing the Centre City PFFP to City Council without any park equivalency standards. Clearly downtown San Diego has constrained parcels that will need the benefit of park equivalency standards.
5.13-21	Fire Protection	The PEIR also improperly analyzes fire services impacts. General Plan Policy PF –D.1 establishes four emergency response times for fire. The first one is that the City respond to 90 percent of priority one emergencies within four minutes adding an additional minute for turnout (5 minute standard). However, on November 15, 2011, the City Council adopted Resolution R-307130 adopting longer response times (7.5 minutes) recommended in the Citygate Report as the framework for implementing the City's fire service protection. (See, http://dockets.sandiego.gov/sirepub/pubmtgframe.aspx?meetid=1248&doctype=Agenda) To the extent the Citygate Report's longer response times are good policy, procedurally the City has never adopted a General Plan amendment to make the response times

O-56 cont.

O-57 Otay Mesa is a developing community; therefore, General Plan park standards can be met and park equivalencies were not considered in Otay Mesa during the update process.

O-58 According to the City's CEQA Significance Thresholds, the focus of environmental analysis should be on the physical impacts of constructing new public service facilities and not response times. At the present time, significance response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval n by the City Council of the affected department's budget proposal of operations within the affected area because developers cannot be required to fund ongoing operational costs nor can they make budgetary decisions regarding such funding. Developers are required to fund construction of new facilities with DIF and FBA as conditions of project approvals. The City Council adopted new standards in 2011 with a Fire Services Standards of Deployment Study. The new performance measures are being incorporated into a General Plan amendment that is currently in process and anticipated to be adopted at City Council in early 2014.

Additionally, CPU Policy 6.1-1 states "Maintain fire and police service levels to meet the demands of continued growth and development in Otay Mesa." The new fire station would be located within the footprint of the CPU, and therefore, would be subject to the same General and Community Plan policies, existing regulations, and mitigation framework established throughout this PEIR, as all other future development within the CPU area. Because adequate protections exist at the program-level and future site-specific analysis would be required for development of a fire station, impacts would be considered in less than significant impacts at the program-level.

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		longer. The public facilities section identifies the 5 minute standard, states that the current response times in the community plan are 8 minutes for priority one calls, and states that an additional fire station is needed to maintain fire protection service levels. The PEIR is deficient because the public and decision-makers are unclear what fire protection level the CPU provides for. Will the new fire station make it possible to meet the five minute standard for all properties within the community plan area? Will it just maintain the current 8 minute level of service? Will it meet the Citygate Report response time standards adopted by the City Council in 2011, but never adopted through a General Plan amendment? The CPU is not consistent with the General Plan because there is no evidence it will meet the General Plan's published response time policy for fire. Furthermore, the PEIR identifies that a new fire station is needed and the funding is provided for in the PFFP, but it will be subject to future environmental review because the future location is unknown. Under these circumstances, the correct CEQA conclusion is not that the environmental impacts are below a level of significance. If the City is going to defer the environmental impact analysis of the fire station to the future when a site is known, then CEQA requires the City to establish performance standards the fire station must meet. What size must the fire station be? Must it be located in a place where it can meet the General Plan response times for the entire community? Do those response times account for delays from failing road segments intersections identified in the PEIR? If so, what are the boundaries of the area within the community plan it would have to be constructed in to meet the required response time standard? What is the noise level generated by a fire station and what buffers would it be required to have to keep from generating a significant noise impact on surrounding land uses? If the PEIR cannot analyze the future fire station with adequate performance standards to assure its impacts are below a level of significance, then it should be identified as a significant and unmitigated impact.
5.13-21 to 5.13-22	Public Services	The PFFP plans for the construction of a co-located fire and police station, and bases its conclusion of less than significant impacts on the construction of that station. That conclusion is without substantial evidence because according to the PFFP, "FUNDING FOR ACQUISITION, DESIGN AND CONSTRUCTION ARE ANTICIPATED IN FY 2044 AND FY 2045." The Project Description is unstable, as discussed above, but 2044 and 2055 is

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O-58 cont.

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O-59 The PEIR adequately addresses response times identified in the General Plan and determined that the impacts were less than significant. This analysis is included in the PEIR in Chapter 5.13, Public Services. The Public Facilities Financing Plan (PFFP), which implements the CPU, identifies the facilities that would be necessary to serve the CPU area under an assumed buildout year of 2062 in order to meet the City's response time goals.

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		beyond the majority of the various planning periods cited in the PEIR and CPU. Therefore, the station cannot be used to mitigate impacts from the project during the planning period. In other words, buildout of the project will be complete before adequate fire and police services are provided. There are several other infrastructure improvements listed in the PFFP, used to mitigate impacts, that will only be completed after buildout of the CPU.
5.17-11	5.17.3.1/Impacts	Build-out of the CPU would eliminate all agricultural activity that occurs within the CPU area. It is anticipated that agricultural operations on the 308 acres of active farmland would continue to be viable in the near-term under the holding zone designation, but are considered to be permanently converted under the long term build-out of the CPU. This includes 180 acres designated as "Farmland of Statewide Importance" and 28 acres of "Unique Farmland" to non-agricultural uses. This will result in a significant cumulative impact. The PEIR should analyze the feasibility of mitigation options such as agricultural conservation easements elsewhere.
Table 5.18-6 and p. 5.18-17	Estimated GHG Emissions and BAU reductions	This section should be updated to reflect new caselaw from the 9th Circuit affirming the constitutionality of the LCFS. There is no need to identify what the BAU reduction would be without LCFS anymore because the legal uncertainty has been removed.
5.18-11	Significance Determination Thresholds	The PEIR's GHG analysis needs to address GHG impacts beyond 2020 for a community plan with a planning horizon of up to 2053, depending on which of the various project descriptions is accurate.
5.18-11	Significance Determination Thresholds	The city's significance threshold of 28.3% below Business as Usual (BAU) is based on CAPCOA's expert opinion from 2008 Report entitled "CEQA & Climate Change". That report identified the BAU approach as a potential significance threshold for analyzing GHG impacts and looked to the then existing 2009 CARB Scoping Plan as its source for selecting 28.3% BAU as the correct BAU percentage. Under CEQA, expert opinion must be based upon facts. Here, the 2008 Scoping Plan is no longer credible evidence that can be relied upon to support an expert opinion because a court found that CARB's 2008 Scoping Plan was not adopted in accordance with CEQA. In the course of addressing the court's concerns, CARB updated the Scoping Plan. After making adjustments for state and federal laws providing GHG mitigation and a reduced GHG forecast caused by the economic downturn, the new and legal Scoping Plan found that 16% reductions below BAU are needed statewide for the state to meet the 2020 target

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O-59 cont.

O-60 As stated in PEIR Section 6.3.17.1, because the loss of this acreage is not regionally significant to agricultural production, the loss would not be cumulatively considerable. Therefore, no mitigation is required.

O-61 The LCFS issue had not been resolved at the time of preparation of the EIR. The text in the EIR has been modified to correct for the current court ruling on LCFS.

O-62 There is no requirement for a Community Plan to include an assessment of GHG emissions beyond 2020. The City has a CAP and a CMAP that address GHG emissions and reduction strategies in compliance with State regulations.

O-63 No jurisdiction or agency has formally adopted a GHG threshold for use in CEQA. The City relies on the seminal works in this area developed by the California Air Pollution Control Officers Association in developing GHG thresholds and determining findings. While the City has reviewed the current Scoping Plan, which the CMAP was based partially on, the City has opted to use the more conservative requirement of 28.3%. Additionally, expert opinion is not required to be based on any single document. In practice, expert opinion requires considering input from many sources.

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		emissions reduction standard required by AB 32. Accordingly, if the City is going to rely on the BAU approach and expert opinion about reductions necessary to achieve the 2020 target, then those expert opinions must be based on the current and only legally adopted Scoping Plan.
5.18-25	5.18.4.3 Mitigation Framework	There is a significant 16.9% gap between the 11.4% BAU reduction and the City's current 28.3% BAU threshold of significance. Mitigation measure GHG-2 requires future projects to select from certain GHG reduction measures it states are feasible to close this significant gap and achieve the city's performance standard. However, in order to avoid improper deferred mitigation, CEQA requires the EIR to provide evidence that the menu of mitigation measures is capable of achieving the performance standard. Here, certain product types like residential have repeatedly demonstrated over the years that it can achieve the GHG threshold through implementation of energy efficiency measures and reliance of state and federal programs like CAFE, Pavley, and LCFS. However, there is reason to believe to that industrial warehouse projects cannot achieve this standard no matter how energy efficient they are because truck trips to these facilities do not benefit from many of the same GHG-reducing transportation programs that residential car traffic does benefit from. Accordingly, the City's findings should explain why it is infeasible to mitigate this warehouse type of land use rather than spread false hope that energy efficiency measures, water conservation and limiting solid waste disposal can feasibly close the gap. The City's alternative analysis should identify an alternative that reduces more industrial uses in favor of more commercial and residential as a feasible means of reducing the GHG emissions from build-out of the CPU. Alternatively, the City's Statement of Overriding Considerations should specifically discuss why these warehouse uses and their unmitigable GHG impacts are acceptable so warehouse project-level EIRs can tier off of that conclusion.
6-15	6.3.10/Noise	The CPU would contribute to a cumulatively considerable noise impact.
6-17	6.3.12/Traffic/ Circulation	The CPU will contribution to traffic/circulation impacts would be cumulatively considerable.
10-4	Alternatives Considered	The PEIR's alternative analysis is inadequate because it contains an overly narrow range of alternatives that reduces significant impacts and cursorily rejects environmentally superior alternatives

O-63 cont. O-64 O-65 O-66 O-67

O-64 Contrary to the comment's assertion that industrial projects cannot reduce emissions, these land uses can and must reduce emissions to assist in achieving the State's mandated goals. While it is true that industrial projects cannot reduce total emissions as effectively as residential uses, they can achieve a reduction percentage over the emissions they would generate without taking any steps to reduce emissions. This is recognized by the state and City, which have both developed percentage reductions from standard operations instead of requiring a reduction of a specific quantity of GHG CO_2e, i.e. 28.3% not 20 MT CO_2e. Additionally, the emission reduction that affects residential vehicles also affects the vehicles that workers drive to work. It should also be noted that CARB has enacted regulations (Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation) affecting on-highway heavy truck, which will also reduce future emissions associated with these types of land uses. No revisions required.

O-65 The statement is noted. As it is not supported by any additional information; no revisions are required.

O-66 The commenter is correct in his assertion. This impact is identified in the referenced section of the PEIR.

O-67 Please refer to the Response to Comment O-13. The alternatives were selected because they meet at least one of the project objectives and would serve to reduce at least one significant impact of the proposed CPU.

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		that meet most of the basic project objectives without providing substantial evidence of infeasibility. The PEIR fails to describe the City's rationale for selecting the alternatives that are discussed, as required by CEQA Guidelines Section 15126.6(c). Merely stating that the alternatives were selected to comply with CEQA, as the PEIR does, is not sufficient detail to inform the City Council and the public why these, and no other, alternatives were analyzed. It is particularly important to explain why only 2 alternatives were analyzed, other than the no project alternative.
		The PEIR failed to describe the City's rationale for not including several alternatives that would meet most Project Objectives and reduce significant impacts. Courts have deemed an EIR's analysis of alternatives defective when an alternative that would reduce significant impacts and achieve most of the basic project objectives is excluded from the analysis and the EIR fails to include a reasonable explanation of the decision to exclude that alternative. The PEIR should have included Reduced Residential Density and Reduced Industrial/Increased Commercial alternatives. The PEIR's failure to do so renders the alternatives analysis defective under CEQA
10-8	No Project Alternative	CEQA contains a "substantive mandate" that agencies refrain from approving a project with significant environmental effects if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. (*Mountain Lion Found. v. Fish & Game Comm.* (1997) 16 Cal.4th 105, 1343; Pub. Res Code § 21002.) It "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives...can substantially lessen such effects." (*Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41.) An EIR may not provide such a cursory rejection of an environmentally superior alternative without supporting analysis. In violation of this mandate, the City has determined that the No Project is the environmentally superior alternative, but has not provided substantial evidence that this alternative is infeasible or impractical.

O-67 cont.

O-68

O-68 Please see Response to Comment G-2.

Letter P

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October 25, 2013

VIA E-MAIL AND U.S. MAIL

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Re: Comments on Otay Mesa Community Plan Update and EIR (Project No. 30330/304032)

Dear Ms. Millette and Ms. Herrmann:

P-1 This firm represents Western Alliance Bankcorporation ("Western Alliance" or "Torrey Pines"), owner of the La Media property ("Property"), a 51.1-acre undeveloped site located at the southeastern corner of Otay Mesa Road and La Media Road in the Otay Mesa Community Plan Area at 8420 Airway Road (APN 646-121-32000). Western Alliance is affiliated with Torrey Pines Bank.

Western Alliance has submitted an application for a commercial development on the Property and the City has deemed the application complete, as discussed in more detail below. The CPU should maintain the Existing Commercial Land Use designation for the entire Property for public policy, fiscal, fairness, and legal reasons.

P-2 Western Alliance has been actively involved in monitoring of the Otay Mesa Community Plan Update ("CPU") and has submitted several previous letters to the City with respect to the CPU. We have enclosed the following correspondence with this letter:

Exhibit A is our most recent letter to the City, dated July 18, 2013. That letter includes attachments to other prior correspondence, including a November 1, 2010 letter commenting on the Notice of Preparation for the Draft Programmatic Environmental Impact Report ("EIR") for the CPU and an August 17, 2011 comment letter on the prior draft of the CPU.

Exhibit B is a memo dated October 25, 2013 providing our comments on the current draft Otay Mesa Community Plan Update Programmatic EIR ("PEIR"). We hereby incorporate by reference all other comments on the CPU EIR into our comment letter.

P-1 The comment provides introductory comments to the letter. No additional response is necessary.

P-2 Comments received in response to the 2010 NOP were incorporated into the Public Review Draft EIR. Please refer to Appendix A.

The City is in receipt of the comment letter on the Draft PEIR. Comments and responses are provided in conjunction with the Final PEIR prior to hearing.

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The comments included in this letter are also comments on the land use analysis of the PEIR.

Exhibit C is a timeline of noteworthy entitlement events related to the project which demonstrates Western Alliance's continuous objection to the change from a Commercial to Industrial Land Use designation, expenditure of countless hours and dollars preserving its existing rights, and dedication to resolving all concerns raised by City staff.

I. Summary of Proposed Project

P-3

On August 8, 2012, the City approved a Tentative Map Waiver ("Map Waiver") and Site Development Permit ("SDP") (Project No. 189429) to subdivide the Property into two separate legal lots. The Map Waiver and SDP were required by the City of San Diego, Development Services Department, because the Property was bisected by the creation of State Route 905 in 2006 by the State of California. The bisect caused the single parcel to have the appearance and potential function of two separate lots. However, in order to convey the Property as two separate lots and to investigate the potential for future development, a subdivision was required. The application for the Map Waiver and SDP was deemed complete on December 21, 2009, pursuant to a letter from the City of San Diego which is attached hereto as Exhibit D.

The Conditions of Approval for the Map Waiver and SDP provided that no development activity shall occur until a new project-specific Site Development Permit (and any other required permits) has been obtained as required by the San Diego Municipal Code. As a result, Western Alliance has assembled a development team and has submitted a project-specific application for an approximately 130,000 SF commercial development on the north parcel and approximately 252,000 SF commercial development on the south parcel ("Project"). The application was submitted to the City of San Diego, Development Services Department, on August 1, 2013, and deemed complete by the City of San Diego on August 23, 2013. (See Exhibit E, Letter from City of San Diego deeming project complete on August 23, 2013.)

The findings for the Map Waiver and SDP determined that "the proposed subdivision and its design would be consistent with the policies, goals, and objectives of the applicable land use plan," which included the General Plan and Community Plan. (See Exhibit F, Resolution No. HO-6548, August 8, 2012, p. 3.) The findings also concluded that the Otay Mesa Community Plan designates the site for specialized commercial purposes and allows the creation of such lots consistent with the size and frontage allowed by the underlying zone.

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II. Proposed Change in Land Use Designation

The Property has been designated for Commercial Land Use in the Otay Mesa Community Plan since at least 1981. The current land use designation for the Property is Specialized Commercial, and the current zoning designation is Otay Mesa Development District Commercial Subdistrict. The current September 2013 draft CPU proposes "Industrial-International Business and Trade" and "Business Park-Office Permitted" for the Property. Torrey Pines has opposed this redesignation for the past three years.

P-3 This comment does not address the environmental analysis provided in the EIR. The comment is acknowledged and is included in the Final EIR for the decision makers to consider. No additional response is necessary.

P-4 The current proposal for the noted property is Heavy Commercial for the northern piece and International Business and Trade (IBT) for the southern piece. Heavy Commercial is a designation that supports both commercial and industrial uses, is implemented with the IL-3-1 zone, and most replicates the Specialized Commercial designation of the existing plan. The IBT designation for the southern portion is due to safety and access factors, as previously noted in past correspondence. La Media Road is a truck route for trucks using the POE; the City has concerns about the mixing of truck traffic with commercial traffic.

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Theresa Millette and Myra Herrmann
October 25, 2013
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P-4 cont. Western Alliance first learned that the City proposed to change the land use designation of the Property in the CPU from commercial to industrial on October 1, 2010, after the Project was deemed complete in 2009. In response to previous letters to the City advocating for the retention of the current Commercial Land Use designation on the Property, on October 21, 2013, Planning & Neighborhood Restoration Director Bill Fulton sent the letter attached hereto as Exhibit G stating that the City can support a Heavy Commercial or Community Commercial Land Use designation for the northern part of the Property and an IBT designation for the southern portion of the Property.

P-5 III. City Should Designate Entire Property as Community Commercial

A. Commercial Designation is Appropriate for the Entire Property

The CPU should maintain the existing Commercial Land Use designation to be consistency with City planning policies. It would integrate Commercial lands into the Central District which would allow employees access to goods and services. Changing the land use is inconsistent with the stated desire to encourage pedestrian activity and create a walkable community. Maintaining the Existing Commercial Land Use designation of the southern portion of the Property is necessary to provide a complete community consistent with the City's General Plan principles promoting walkable, balanced communities with efficient transportation links to employment centers. (General Plan Guiding Principles 3 and 5; SF-6.) The proposed CPU does not include any commercial south of SR-905, so maintaining the Commercial Land Use designation at the Property would serve that need. It would also be consistent with CPU Policy and Recommendation for Commercial 2.3-1 which states: "Maintain lands for existing commercial development within Otay Mesa to serve the demands of the residential and employment communities." (CPU, at p. LU-21.)

The CPU rezones property, currently designated industrial, to add commercial acres farther to east rather than retaining commercial acres, such as the Property ideally located at the 905 / La Media interchange. The CPU outlines an absence of commercial uses in the Central District, although there are residential, business park, recreational, educational, and institutional uses proposed. We believe that these uses would be complemented by nearby commercial uses, and nothing in the CPU states that there is too much commercial in this area.

The City's own economic analysis supports the need for retail near the major employment areas south of SR-905. It states that "workers within Otay Mesa" are one of the primary sources of market support for retail and that "there is limited retail space currently". (ERA Real Estate Market Analysis, at p. 17.) Further, the CPU's definition of Community Commercial supports the designation of the southern portion as Community Commercial. It states: "Community Commercial lands are located adjacent to SR-905 to accommodate the demand for goods and services of the residential and employment communities of Otay Mesa at buildout." (CPU, at p. LU-21.) The southern portion of the Property is adjacent to several transportation corridors including SR-905 and will serve many employment areas.

The IBT designation is ill-fitting to the southern portion of the Property because according to the CPU, IBT lands are "appropriate to apply in portions of the communities adjacent to the border.

P-5 See Response to Comment P-4. Also, throughout the CPU process, there have been multiple designations analyzed on this property, including residential and commercial uses. The Planning Division has been advised that access along Otay Mesa Road and both the northern and southern portion of La Media Road may not be allowed driveway access due to proximity to the freeway and the classifications of the streets which would affect the viability of commercial development. Additionally, based on the CPU market analysis, the draft land uses for Scenario 3B include adequate commercial capacity for build-out of the community.

Walkability within the area of the intersection of Otay Mesa and La Media Roads will be based on urban design rather than the land use designation. The area contributes to the General Plan's designation of Otay Mesa as a Subregional Employment Center. The only commercial uses south of the SR-905 are in the POE area, which is appropriate.

The CPU states "IBT lands are focused primarily in the border zone, west of the Otay Mesa Port of Entry; covering most of the land east of Britannia Boulevard and south of the Central District's Great Park. IBT is also designated between Otay Mesa Road and SR-905 adjacent to Brown Field." The property designated for IBT meets the general description.

With the southern portion designated IBT, it would implement goals on page I-4 by contributing to Otay Mesa as a Bi-National Regional Center, broaden the economic profile to increase employment and growth opportunities, and enhance and sustain Otay Mesa's strong economic base and potential for expansion. The IBT designation would implement policies 2.4-5, 5.1-1 – 5.1-5, and 5.1-10 – 5.1-12.

P-5 cont.

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other ports of entry, or areas in transition to higher density." (CPU, at Table 2-3.) The Property meets none of these criteria.

In addition, the following goals and policies of the CPU support maintaining the Existing Commercial Land Use designation on the southern portion of the Property:

- Page I-5: "a major transit corridor is envisioned to travel in an east-west direction, linking much of the community to the region at large." Airway Road has limited commercial opportunities. An industrial use on the site would emphasize driving over walking or biking and conflict with the goals of the General Plan and the CPU.
- Page I-6: "The Central District, which generally is the land along the Airway Road Corridor, is envisioned as the transit corridor and spine of the community with the Central Village at the western end and employment opportunities at the eastern end." The southern portion of the site abuts Airway Road and will serve the surrounding industrial designated lands. The Property fronts on two transit corridors (Airway and La Media Roads) which makes it an ideal location for Commercial development and is consistent with the original and existing Otay Mesa Community Plan.
- Page LU-1: "A distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services needed to serve Otay Mesa": "Diversified commercial uses that serve local, community, and regional needs." Removing the Commercial Land Use designation is inconsistent with these goals as it isolates the employment lands from goods and services needed by employees.
- Tables 2-1 and 2-2: These show the reduction in commercial lands, approximately 170 acres, compared to residential and open space acreage which is being increased. Dwelling units are increasing by 50% which equates to greater commercial need.
- Page ME-6: This includes a discussion of street classifications that states that Major Streets and Primary Arterials should accommodate pedestrians, yet these streets are discussed as carrying through traffic with minimal or no driveway access. Neither of these classifications of streets are pedestrian-friendly – high volume and high speed streets are not comfortable places for pedestrians. Commercial Land Use on the property would better encourage pedestrians from the employment areas south of SR-905.
- Page EP-1: "the community continues to see an increase in residential development, bringing not only more residents but the demand for greater access to commercial and retail businesses", "Commercial uses that support Otay Mesa's industrial community." Maintaining the existing Commercial Land Use designation is consistent with these policies.
- Page EP-7: "A majority of these lands are located in close proximity to SR-125, SR-905, and the Port of Entry to meet the demand of border-related activities." This parcel is

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P-5 cont.

located abutting SR-905 and three transportation corridors and will serve the employment lands surrounding the Property.

- Page EP-8 Policy and Recommendation 5.2-4 states: "Locate large retail establishments along transportation corridors to minimize impacts to residential neighborhoods." While the Property is not located in a residential neighborhood, it abuts three transportation corridors as well as SR-905 so is consistent with this policy

P-6

B. Western Alliance Has Detrimentally Relied On Existing Commercial Designation

The Project has been in the City's regulatory pipeline for several years and has relied on the current Otay Mesa Commercial Land Use designation in its financial and planning decisions. Western Alliance has diligently worked towards the requirements for City approval of the Project under the assumption that commercial use would remain on the entire Property. As mentioned above, the Property has had a Commercial Land Use designation in the Otay Mesa Community Plan since at least 1981. Both the 3B and 4B scenarios depicted on the City's website in April 2009 proposed to retain commercial use on the northern portion of the property, with either Village Community or International Business and Trade uses on the southern portion of the property. Yet the CPU now eliminates all commercial and Village Community and proposes IBT on the Property.

The City deemed the Project complete on December 21, 2009, and Western Alliance only found out about the City's proposal to change the land use designation in 2010. Therefore, the rules in place at that time, including the Commercial Land Use designation for the entire property, should remain. Under California law, once an agency deems a project application complete, it typically may not change the development rules, regulation and policies applicable to the project, including land use designations, unless it would place residents in a condition dangerous to their health or safety.

Western Alliance has a vested right to the Commercial Land Use designation even though the CPU was pending at the time the application was deemed complete in 2009. The Government Code allows an agency to apply new rules when, at the time of the application, the agency (1) initiated proceedings for a development rule change by way of ordinance, resolution, or motion, and (2) published notice in accordance with Government Code § 65090 containing a description sufficient to notify the public of the nature of the proposed change in the applicable general or specific plans, or zoning or subdivision ordinances. Gov't Code § 65474.2(b).) While Western Alliance has generally known that the CPU has been pending for several years, it did not know for certain that the draft CPU released in September 2013 would eliminate all the commercial uses that had existed since the 1981. Commercial was the predominate use in the April 2009 3B and 4B scenarios, and as discussed in more detail below, City officials assured Western Alliance that the Property would be designated commercial through 2012 and 2013.

Moreover, the City is estopped from eliminating the commercial designation in the CPU. As demonstrated above, the City has been aware of both the Project's proposed commercial development and the CPU since at least 2009. Based upon the City's assurances, Western Alliance was unaware that the City would eliminate the Commercial Land Use designation from

P-6 All projects that have been deemed complete prior to the date of adoption of the Otay Mesa Community Plan Update and associated actions will be evaluated with regard to land-use and zoning consistency based upon the Otay Mesa Community Plan and the Otay Mesa Development District that were in existence at the time of a project's deemed complete date.

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P-6 cont.

the Property in the CPU. Western Alliance had a right to believe the City intended Western Alliance to act upon these assurances, has relied on these assurances to its detriment, and will incur injury or prejudice as a result. *La Canada Flintridge Dev. Corp. v. Dept. of Transp.* (1985) 166 Cal.App.3d 206, 219. The injury to Western Alliance's interests if the City is not estopped from eliminating the commercial designation exceeds the injury to the public interest if the City is estopped.

P-7

C. Traffic Impacts Would Be Less With Commercial Than IBT

Maintaining the Existing Commercial Land Use abutting the intersection of La Media and Airway Roads will reduce vehicle miles traveled for services desired by employees in the industrial area. The Property is convenient for employees of the industrial and distribution centers already existing or planned in the CPU for the area south of SR-905. If the southern portion were redesignated as IBT as proposed by the CPU, those employees would need to travel further to reach commercial and retail services, which would in turn exacerbate traffic impacts and corresponding air quality, greenhouse gas, and noise impacts.

Moreover, retaining the existing Commercial Land Use designation would not adversely affect the proposed CPU's level of service on Otay Mesa Road, would not appear to trigger significant delays, and would not have an impact on the traffic analysis performed for the CPU. Based on a traffic analysis requested by the City and performed by Urban Systems, which can be found in the exhibits to the letter attached hereto as Exhibit A, the traffic volumes based on a commercial use can be accommodated without the need for roadway reclassifications and that the roads will operate at acceptable levels of service.

P-8

D. Commercial is Consistent with the General Plan

Comercial Land Use, not Industrial, is consistent with the General Plan. The General Plan does not designate the Property as Prime Industrial Land. (General Plan, Figure EP-1.) The General Plan assumed that the existing Commercial Land Use designation would remain. Figure 5-1 of the General Plan states that Prime Industrial Lands in Otay Mesa will be identified as part of the community plan update process. In addition, the Property does not meet the General Plan criteria for Prime Industrial Lands. According the General Plan, the purpose of the Prime Industrial Lands designation is to preserve existing industrial land, not to convert land designated for other uses to industrial. It states: "The identification of prime industrial lands is intended to protect valuable employment land for base sector industries." (General Plan, at p. EP-7.) Further, the commercial designation is consistent with the planning documents of other agencies such as the San Diego County Regional Airport Authority and the San Diego Association of Governments.

P-9

E. City Has Previously Agreed to Keep Entire Property as Commercial

In the last few years, the City has assured Western Alliance several times that the Property will retain its Commercial Land Use designation. For example, in a phone call to me on January 12, 2012, Planning Director Bill Anderson confirmed that it was his recollection that at a October 28, 2010 meeting between Western Alliance representatives and City staff, the City agreed that if

P-7 While a traffic analysis was generated for the commercial uses at this location and submitted to the City, City transportation staff is not in agreement with the analysis and would require further review and analysis prior to acceptance of the report's conclusions.

P-8 Each of the General Plan's elements were carefully considered and evaluated during the evolution of the plan update. The CPU goals and policies are based upon many factors, including a comprehensive evaluation of market analysis, housing needs, and resource protection. The CPU has analyzed lands for Prime Industrial, and has both removed industrial designation (the Central Village area, the Lonestar property) and added industrial designation (southern portion of Western Alliance property). This was analysis throughout the update process, and is not considered a conversion per the General Plan's Figure EP-1.

P-9 While a traffic analysis was generated for the commercial uses at this location and submitted to the City, City transportation staff is not in agreement with the analysis and would require further review and analysis prior to acceptance of the conclusions of the traffic report.

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P-9 cont.

Western Alliance performed a traffic analysis and demonstrated that leaving the Property as commercial would not result in the need for re-classification of any roadways in the CPU or delay the CPU, the City would leave the property designated as Commercial in the next draft of the CPU. As explained in more detail in the letter attached as Exhibit A, Western Alliance fully fulfilled those conditions and resolved the City's concerns.

In addition, on May 22, 2013, Kelly Broughton confirmed in a conversation with me that Western Alliance had met the traffic analysis conditions given by the City in the October 28, 2010 meeting for maintaining the Commercial Land Use designation and also stated that if an application for development of a commercial use were submitted and deemed complete prior to the adoption of the CPU, the City would have no alternative but to allow the commercial use to continue.

P-10

F. Community Supports Commercial/Retail On Entire Property

The City should respect the desire of the community to maintain the entire Property designated as Commercial. The benefits to the community of maintaining the current Commercial designation have been recognized by the Otay Mesa Community Planning Group (Planning Group). In February, 2010, the Planning Group unanimously supported the Map Waiver and Site Development Permit for Commercial uses. On April 20, 2011, the Planning Group unanimously passed a motion to support the current Commercial designation of the Property, and not the industrial designations as proposed by the CPU, contingent on Western Alliance agreeing to address traffic issues. On July 31, 2013, the Planning Group agreed that Western Alliance had addressed the traffic issues and unanimously re-affirmed its support for Commercial/Retail development for the entire Property. In addition, Theresa Millette from the City's Planning Division stated at that meeting that the City cannot change Commercial Land Use designation of the Property to Industrial after its development application is deemed complete.

P-11

G. Commercial Designation Makes Fiscal Sense

From a fiscal perspective, the City would benefit from maintaining the Commercial Land Use designation on the entire Property. The adopted community plan proposes 453 acres of commercial, but the CPU only proposes 284 acres of commercial. (CPU, Tables 2-1 and 2-2, at p. LU-2.) The 2007 Fiscal Impact Analysis of Otay Mesa Community Plan Update analyzed the net fiscal impacts of three CPU scenarios with varying amounts of commercial, and determined that the City would benefit from increased acreage of commercial designation. Scenario 1, with 512 acres of commercial, netted the highest annual returns for the City with $19.1 million. Scenario 2, with 400 acres of commercial, netted $17.5 million annually. ERA, the author of the study, explained, "Scenario 1's anticipated sales tax, property tax, and transient occupancy tax receipts help to generate the highest revenues of all the scenarios." (2007 Fiscal Impact Analysis at p. 7.) The proposed CPU causes fiscal harm to the City by changing the existing Commercial designation to IBT. Retaining the existing Commercial use would also help provide revenue for much needed public infrastructure through increased Facilities Benefits Assessment fees. Therefore, maintaining the Commercial Land Use designation on the Property would be fiscally sound for the City.

P-10 The CPG has supported the commercial designation, as long as the designation does not delay the CPU process. While a traffic analysis was generated for the commercial uses at this location and submitted to the City, City transportation staff is not in agreement with the analysis and would require further review and analysis prior to acceptance of the report's conclusions. All projects that have been deemed complete prior to the date of adoption of the Otay Mesa Community Plan Update and associated actions will be evaluated with regard to land-use and zoning consistency based upon the Otay Mesa Community Plan and the Otay Mesa Development District that were in existence at the time of a project's deemed complete date.

P-11 Comment noted. Other factors have been part of the CPU process, one of which includes the need to provide base sector employment lands, as Otay is identified as a Subregional Employment Center.

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Theresa Millette and Myra Herrmann
October 25, 2013
Page 8

H. IBT Designation is Based on Flawed Reasoning and Data

P-12 The City based its decision to redesignate the southern portion of the Property as IBT on unfounded concerns. In the October 21, 2013 letter from Bill Fulton (Exhibit G), the City expressed concerns regarding mixing truck traffic with commercial traffic, inadequate access, and the lack of any other commercial uses south of SR-905. None of these purported rationales withstands a closer examination of the facts. In addition, the City's proposal to designate the southern portion of the Property as IBT is unreasonable.

1. No Issues With Truck Traffic

P-13 The assumption that Commercial use on the southern portion of the Property would create truck traffic issues is misplaced. An industrial use on the Property, with its corresponding increase in truck trips, would exacerbate the truck traffic problem, while a Commercial use would reduce it. The Property abuts an intersection with SR-905, so the majority of the trucks will be stopping to either enter or exit the freeway. Passenger vehicles are unlikely to impede the flow of traffic of the trucks. Moreover, the trucks will not be entering or exiting the Property but will be headed to or from the Port of Entry from SR-905.

In addition, the City should not let short term concerns override long-term planning. The CPU is a long-term planning document which states that it has a 15-20 year planning period. (CPU, p. I-3.) The truck traffic issue will be substantially resolved after the completion of the improvements on La Media Road, truck routing plans for the Otay Mesa Port of Entry, and the new Otay Mesa East Port of Entry scheduled to be complete in 2015. The purchase of the SR-125 toll road by SANDAG from a private operator will also reduce traffic impacts on Otay Mesa, including truck trips.

The designation of the southern portion of the Property with a Commercial Land Use would be more compatible with the truck traffic than designation of the site as IBT. Given the diversion of traffic that will occur from La Media Road to Airway Road, congestion will be lessened at the La Media Road/Airway Road intersection. Finally, the designation of the southern portion of the Property as IBT would actually result in increased truck traffic conflicts compared to a Commercial Land Use designation on the property because employees driving in cars from the industrial and distribution uses near the Port of Entry would need to use designated truck routes for further distances to reach commercial north of SR-905.

2. Access for Commercial Would Be Safe and Adequate

P-14 The City should not interpret the location of the Property as a reason to anticipate limited access, but should view it as being consistent with adjacent transportation corridors. The location of the Property next to the freeway and Otay Mesa Road is a factor that supports Commercial use. CPU Economic Prosperity Element, Policy and Recommendation 5.2-4 states: "Locate large retail establishments along transportation corridors to minimize impacts to residential neighborhoods." The Property is consistent with this policy because it is situated along three major transportation corridors.

P-12 The City stands by the rational detailed within the October 21, 2013 and September 30, 2011 letter exchange between SheppardMullin and Planning Director, Bill Fulton.

P-13 See Response to Comment P-12. The truck traffic issues' resolution through the La Media improvements, POE reconfiguration, new POE opening, and the purchase of the SR-125 are highly speculative. The new POE and the SR-125 are toll roads, and there is no analysis or evidence that truck traffic will use toll systems for goods movement. The City roads will continue to have truck impacts.

P-14 See Response to Comment P-7.

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P-15

3. Treatment of Surrounding Properties is Inconsistent

The CPU proposes to redesignate the adjacent Sunrpad property from Industrial to Commercial while simultaneously redesignating the Western Alliance Property from Commercial to Industrial without any reasonable justification. Western Alliance is not opposed to the proposed change on the Sunroad property, but the change should not come at the expense of removing the Commercial Land Use designation on the Western Alliance Property, which diminishes the value of the Property and undermines the years of diligent work Western Alliance has performed to approve a Commercial development on the Property.

The treatment of the Sunroad property contradicts the City's statements that there is already sufficient commercial acreage to service the Otay Mesa community through CPU buildout. (CPU, at p. LU-20.) If there were already ample commercial, then the City could not be justified in increasing the Commercial designation on the Sunroad property. If the City maintained the Commercial designation on the southern portion of the Property, it would be consistent with the remainder of the Property as well as the Sunroad property, which would allow enhanced functioning of circulation, parking, drainage, and other infrastructure. Western Alliance is hopeful that the City will resolve this issue to the satisfaction of all parties by designating both the Sunroad and Western Alliance properties as commercial. Western Alliance is currently working cooperatively with Sunroad to facilitate parking, circulation and drainage based upon land uses of commercial for both properties.

In addition, the CPU's shifting of Commercial to the east is also antithetical to the CPU's stated project goal to designate a corridor of Business Park industrial uses along SR-905. The CPU achieves this for most of the SR-905 until just west of La Media road, where the it shifts to a leapfrog of Industrial and Commercial use pattern.

P-16

4. City Based IBT Designation on Outdated and Flawed Data

The CPU's proposed designations are based on stale and erroneous data. For example, staff directed ERA to prepare a Real Estate Market Analysis justifying more industrial in Otay Mesa. The report is dated 2005 with an addendum in 2006 and the analysis was based on data dating from before 2000 until 2004. Circumstances in Otay Mesa have changed substantially since that time. The ERA report was prepared during the last real estate boom and before the Great Recession. According to the ERA report, the City anticipates 870,000 s.f. of industrial building absorption per year compared to an average of 474,000 s.f. from 1986 to 2004 during comparatively vigorous economic conditions. (ERA Real Estate Market Analysis, at p. 19.) The conclusion that there will still be almost double the industrial absorption compared to historical trends is questionable, especially considering that ERA, the City's own expert, estimated that it would be less. (ERA Real Estate Market Analysis, at p. 19.) Therefore the ERA analysis is far too outdated to support the conclusions in the CPU, and the City's purported need for more industrial rather than Commercial space is without adequate basis.

Despite its flaws, the ERA report nonetheless stated that there was a need for 32.5 acres of retail land for the community and 5.7 acres for the border crossing area. To the extent the market has changed since 2005, there is actually much more demand for retail and commercial

P-15 The adjacent Sunroad property has requested that the property remain the Heavy Commercial land use designation rather than the Regional Commercial land use designation. As such, the property will be zoned IL-3-1, which allows a mix of both commercial and industrial uses. The designation of Heavy commercial would allow for a consistent string of Heavy Commercial uses between Alisa Court and the SR-125.

P-16 At this time, the City is not considering that another market analysis be done.

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uses than there was previously. Rob Hixson, Senior Vice President for CB Richard Ellis and an expert in industrial development in Otay Mesa, reviewed the economic study and concluded that the CPU is insufficient to support existing market demand for retail from such major tenants as Wal-Mart, Target and Food 4 Less, who are currently in the market looking for available retail land. (See Exhibit H, email from Rob Hixson, December 21, 2011.) If the City believes that the assumptions made in 2005 are still true, we believe that it should perform another study to confirm those assumptions. We believe that an updated market study will reveal that there is an overabundance of industrial land in Otay Mesa, not Commercial land.

P-16 cont.

IV. Conclusion

P-17

Western Alliance has participated and commented throughout the CPU process, including submitting the detailed comment letters attached, and has consistently protested the change from the Commercial designation to Industrial. We have always responded to City staff's requests for more information and addressed staff's previous concerns. We therefore respectfully request that the City retain the current Commercial land use designation on all of the Property including the southern portion of the Property.

Thank you for the opportunity to comment on the CPU. We look forward to discussing these issues with you further. Please do not hesitate to contact us if you require information regarding the nature and scope of our comments.

Very truly yours,

John E. Ponder
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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Encl. Exhibit A: Sheppard Mullin letter to the B. Fulton, July 18, 2013.
Exhibit B: Draft EIR comments, October 25, 2013
Exhibit C: Timeline of Torrey Pines CPU and Entitlement Events
Exhibit D: Letter from City deeming project complete, December 21, 2009
Exhibit E: Letter from City deeming project complete, August 23, 2013.
Exhibit F: Resolution No. HO-6548, August 8, 2012.
Exhibit G: Letter from B. Fulton, October 21, 2013.
Exhibit H: Email from Rob Hixson, December 21, 2011.

cc: Anne-Marie Berg, Torrey Pines Bank
Bill Fulton, Department of Planning and Neighborhood Restoration
Councilmember Alvarez, City of San Diego

P-17 This comment does not address the environmental analysis provided in the EIR. The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

P-18 Exhibits attached are for reference only and do not require response. They have been included in Appendix O of the Final EIR.

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S.0 Executive Summary

S.1 Project Synopsis

This summary provides a brief synopsis of: (1) the Community Plan Update (CPU) to the adopted 1981 Otay Mesa Community Plan, the associated rezoning and Land Development Code (LDC) amendments; (2) the results of the environmental analysis contained within this Program Environmental Impact Report (PEIR); (3) the alternatives that were considered; and (4) the major areas of controversy and issues to be resolved by the Lead Agency. This summary does not contain the extensive background and analysis found in the PEIR. Therefore, the reader should review the entire PEIR to fully understand the CPU and its environmental consequences.

S.1.1 Project Location and Setting

The CPU area is in the southeastern portion of the City of San Diego (City), just north of the United States International Border with Mexico. The CPU area is bounded by the Otay River Valley and the City of Chula Vista on the north; an unincorporated area of San Diego County to the east; the International Border and the City of Tijuana on the south; and Interstate 805 (I-805) on the west. The San Ysidro, Otay Mesa-Nestor, and the Tijuana River Valley communities in the City of San Diego are located west of the CPU area.

The CPU area encompasses approximately ~~9,300~~9,302 acres. Multiple jurisdictions govern land surrounding Otay Mesa, including but not limited to the City of San Diego, City of Chula Vista, County of San Diego, and City of Tijuana, Baja California, Mexico. Major facilities, such as the Otay Mesa Port of Entry (POE), Brown Field airport, and Donovan Correctional Facility, exist within and adjacent to the CPU area. ~~The~~ In addition, the Nakano property, which is located in the most northwestern corner of Otay Mesa, south of the Otay River Valley is directly adjacent to, but not a part of the CPU. This property is within the City of Chula Vista's land use authority, ~~but~~ and is only shown on figures ~~throughout~~ within Section 3 (Environmental Setting) of the PEIR for context and delineated with dashed lines.

S.1.2 Project Description

The CPU is a comprehensive update to the adopted 1981 Otay Mesa Community Plan. The CPU was undertaken to address substantial land use changes, both locally and regionally, that have occurred over the past 25 years. The CPU is guided by the framework and policy direction in the 2008 City of San Diego General Plan Update and

reflects new citywide policies and programs from the General Plan for the CPU area. The CPU contains a plan for land use and circulation with the CPU area and includes the following nine elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation, along with a chapter pertaining to Implementation.

The CPU would refine and implement the general vision and goals as expressed in the General Plan for the CPU area. It provides community-specific land use, development design guidelines, and numerous mobility and local guidelines, incentives, and programs in accordance with the goals stated in the General Plan. The CPU would additionally serve as the basis for guiding a variety of other actions, such as parkland acquisitions, public service/facilities, and transportation improvements.

Discretionary actions required to implement the CPU, and addressed in this PEIR, include: adoption of the CPU and associated actions; approval of a General Plan Amendment; rescission of the Otay Mesa Development District (OMDD); ~~and adoption~~ amendments to the City's Land Development Code (LDC) to include ~~of~~ an "International Business and Trade" (IBT) Zone and the IP-3-1 Zone to implement the proposed Business Park – Residential Permitted (BPRP) land use category; adoption of two Community Plan Implementation Overlay Zones (CPIOZs); and adoption of an updated Public Facilities Financing Plan (PFFP); ~~and amendments to the City's Land Development Code~~. Certification of the PEIR at a noticed public hearing (Process 5) would also be required in conjunction with adoption of the CPU and associated actions.

S.1.3 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15124, the following specific objectives for the CPU support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The primary objectives of the CPU are the following:

- **Regional Center**: Enhance Otay Mesa's role as a bi-national regional center.
- **Economic Diversification**: Broaden the economic profile to increase employment and growth opportunities.
- **Industrial Capacity**: Enhance and sustain Otay Mesa's strong economic base and potential for expansion.
- **International Trade**: Support activities that promote greater interregional and bi-national activities.
- **Housing:** Provide more and varied housing and meet workforce needs close to employment centers.

- **Complete Places**: Create balanced, integrated mix of uses in Otay Mesa while minimizing collocation compatibility issues.
- **Transit:** Coordinate land use planning with high frequency transit service planning.
- **Open Space**: Protect the canyon lands and sensitive biological resources while providing recreational opportunities.
- **Infrastructure:** Include financing mechanisms that can secure infrastructure improvements concurrent with development.
- **Environmental Leadership and Sustainability:** Follow environmentally sensitive design and sustainable development practices.

The above objectives are specific to the Otay Mesa planning area, and are intended to implement the broader goals, policies, and Guiding Principles of the General Plan. Following are the Guiding Principles of the General Plan which were used to develop the more refined objectives above.

- An open space network formed by parks, canyons, river valleys, habitats, beaches and ocean;
- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High quality, affordable, and well-maintained public facilities to serve the City's population, workers, and visitors:
- Historic districts and sites that respect our heritage;
- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and
- A high aesthetic standard.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table S-1, located at the end of this Executive Summary, summarizes the significant effects of the environmental analysis for the CPU. Table S-1 also includes mitigation measures to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. The mitigation measures listed in Table S-1 are also discussed within each relevant topical area and fully contained in Section 11, Mitigation Monitoring and Reporting Program.

S.3 Areas of Controversy

Areas of controversy associated with the CPU primarily concern the issues of land use, including the collocation of residential and industrial uses; traffic congestion and truck routes; adequacy of public services and facilities; air quality and noise issues; greenhouse gas emissions; and impacts to biologically sensitive resources, specifically vernal pools and burrowing owls. All of these issues are analyzed in the PEIR.

S.4 Issues to be Resolved by the Lead Agency

The issues to be resolved by the decision-making body (in this case the City of San Diego City Council) are whether: (1) the significant impacts associated with the environmental issues of land use (regulation consistency, MHPA adjacency); biological resources; cultural/historic resources; human health/public safety/hazardous materials; hydrology/water quality/drainage; geology and soils, and paleontological resources would be fully mitigated to below a level of significance; (2) there are overriding reasons to approve the project despite the significant unavoidable air quality (criteria pollutants, sensitive receptors - stationary sources/collocation); greenhouse gas emissions; noise (traffic, stationary sources and construction); traffic (capacity), and utilities (solid waste) impacts; or (3) to approve any of the alternatives instead of the proposed project.

The Lead Agency must also decide if the CPU conforms to land use policies, such as those in the General Plan and MSCP Subarea Plan. Finally, the Lead Agency must determine whether the CPU or an alternative might best meet the key objectives while reducing environmental impacts.

S.5 Summary of Project Alternatives

Section 15126.6 of the CEQA Guidelines requires the discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

In addition to the CPU, the PEIR addresses three alternatives considered in detail: the No Project Alternative, the Reduced Biological Impacts Alternative, and the Reduced Density Alternative. These alternatives are evaluated in full in Section 10.0, Alternatives, of this document.

S.5.1 Alternatives Considered but Rejected

Vernal Pool and Vernal Pool Conservation Alternative

An alternative was considered where all vernal pools and vernal pool species would be conserved. In order to ensure the long-term viability of the vernal pools and species, conservation of associated watersheds and sufficient buffers would also be required. While this alternative would significantly reduce impacts to vernal pool resources and the surrounding non-native grasslands, this alternative was rejected because the ability to provide a neighborhood village within the southwest CPU area would be severely constrained.

Due to the scattered location of the vernal pool resources within the southwest village area, the available development area would result in compact development, but would separate out exclusive development areas without an integrated circulation pattern or open space system. Benefits of the village areas such as but not limited to compact development, multi-model transportation networks and mixed-use development opportunities as further described below would not be realized. In addition, the following goals and objectives of the General Plan and CPU for this area would not be achieved:

- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;

- Distinct villages that include places to live, work and recreate;
- Require a mixed-use residential/commercial component to be included within village core areas, with neighborhood-serving commercial uses such and food markets, restaurants, and other small retail shops.

S.5.2 Alternatives Considered

S.5.2.1 No Project Alternative (Adopted Community Plan)

The No Project Alternative consists of continued implementation of the adopted 1981 Otay Mesa Community Plan including amendments to the plan as further described in Section 10.2.1, consistent with the provisions outlined in CEQA Guidelines Section 15126.6(e)(3)(A). Compared to the CPU, the No Project Alternative would comprise less density for residential land use and more industrial land. The general distribution of land uses in the No Project Alternative would have residential uses on the west side of the CPU and industrial uses in the central-eastern areas. The residential uses on the west side would be comprised of conventional suburban development, while the industrial uses on the east side would mainly include labor intensive manufacturing, warehousing, and distribution, with only limited office uses.

As residential and industrial land uses would be primarily segregated with the No Project Alternative, potential impacts associated with the adjacency of residential and industrial uses would be avoided, specifically those associated with hazardous materials and sites. However, some beneficial features of the CPU would not be realized under the No Project Alternative. These include the integration of village centers along transportation corridors, creation of Community and Neighborhood Villages, and the inclusion of new specific land use designations (e.g., International Business and Trade and Business Park – Residential Permitted). As such, the goals and objectives of the General Plan and Strategic Framework Element related to international trade, housing, complete places, transit, open space, infrastructure, and environmental leadership and sustainability would not be fully achieved. Additionally, the continued segregation of land uses would result in greater traffic volumes, and correspondingly, greater impacts associated with traffic/circulation, air quality, noise (traffic) and greenhouse gas emissions when compared to the CPU. Also, the No Project Alternative would preserve fewer acres of open space and provide for less compact forms of development, thereby resulting in greater impacts to visual quality/landform alteration, biological resources, historical resources, hydrology/water quality and paleontological resources.

S.5.2.2 Reduced Biological Impacts Alternative

The Reduced Biological Impact Alternative would reduce impacts to biological resources by preserving additional lands in two locations within the CPU, one in the Southwest Village in the southwest area of the CPU and the second in an area west of La Media Road in the south-central portion of the CPU (see Figure 10-2). Both of these areas would become part of the MHPA. This alternative would allow for less grading or ground disturbing activity, and thus would reduce conflicts with the purpose and intent of the ESL and Historical Resources Regulations of the LDC, and slightly reduce impacts to historical and paleontological resources, when compared to the CPU.

The Reduced Biological Impacts Alternatives provides fewer dwelling units in the Southwest Village as compared to the CPU but still meets the goals and objectives of the General Plan and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan (RCP). The lesser intensity of residential use and the fewer number of commercial developments allowed for in this alternative minimally reduces impacts related to traffic congestion (such as, air quality, noise, greenhouse gas emissions), but not to below a level of significance. Impacts to visual resources (landform alteration), hydrology/water quality, and energy conservation are also less when compared to the CPU. Because this alternative would increase the amount of open space in close proximity to development, the risk from wildfire would be slightly greater, but would still be mitigated through strict compliance with the Landscape Standards and Brush Management Regulations contained in the Land Development Code. This alternative generally meets all project objectives but would not accommodate future population growth to the same extent as the CPU.

S.5.2.3 Reduced Density Alternative

The Reduced Density Alternative would convert the IBT land use designation to "Light Industrial," thereby excluding business park uses and would serve to reduce the trip generation rates in these areas. The maximum number of residences within the Southwest Village and the Central Village would be reduced as well, although permitting enough to be consistent with the Transit Oriented Development (TOD) Guidelines used in the CPU, even if the goals to reduce numbers of average daily traffic (ADTs) in these villages are met to a slightly lesser extent. This alternative still meets the goals and objectives of the General Plan and SANDAG's RCP.

As the development pattern for the Reduced Density Alternative is similar to the CPU, impacts to most areas (land use, biological resources, historical resources, human health/public safety/hazardous materials (risk from wildfires), hydrology/water quality, geology/soils, and paleontological resources) are roughly equivalent to the CPU. Due to the fewer number of residences allowed, significant impacts to air quality, noise, utilities (solid waste), transportation/circulation, and greenhouse gas emissions are slightly

reduced than in the CPU but not to below a level of significance. Because the land use segregation of housing and industrial is greater in this plan, there is also a small reduction in risk of exposure to hazardous materials. This alternative generally meets project objectives but with less density within village areas that would not accommodate future population growth or provide greater transit opportunities to the same extent as the CPU. The Reduced Density alternative would allow for more suburban-type development, which could be more auto-dependent, and therefore contribute to, rather than reduce greenhouse gas emissions.

S.5.2.4 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 10 of the PEIR, the Reduced Biological Impacts Alternative would be considered environmentally superior because it would preserve more open space and, therefore, result in fewer impacts to biological, archaeological and paleontological resources; hydrology/water quality; human health/public safety/hazardous materials, and utilities (including solid waste), resulting from a decrease in developable land that could be graded. It also would reduce (but not avoid) the significant and unavoidable impacts of the CPU (i.e., air quality [criteria pollutants, sensitive receptors - stationary sources/collocation], noise [traffic, construction and stationary sources], traffic/circulation [capacity], utilities [solid waste], and greenhouse gas emissions).

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
LAND USE			
Regulation Consistency Would the CPU result in a conflict with the purpose and intent of the ESL Regulations, the Historical Resources Regulation, and the Brush Management Regulation of the City of San Diego Land Development Code (LDC)?	**Environmentally Sensitive Lands Regulations** The development footprint of the CPU would encroach into sensitive ESL areas. Future public and private development proposals would be required to comply with the ESL Regulations or process a Site Development Permit in order to deviate from the regulations. Additionally, all subsequent discretionary projects would be subject to review in accordance with CEQA. At which time, appropriate site-specific mitigation in accordance with the Mitigation Framework LU-2 and BIO-1 through BIO-4 would be identified for impacts to sensitive biological resources covered under the ESL Regulations. For other resource areas covered under the ESL Regulations, such as steep hillsides and floodplains, future projects would be designed to ensure compliance with the supplemental regulations and any other regulatory requirements to ensure that no impacts would occur. The CPU also includes several policies (see Table 5.4-5) which aim to reduce impacts to sensitive and other resources covered under the ESL Regulations as well as development regulations required for projects within areas covered by CPIOZ Type A, which address sensitive biological resources.	**Environmentally Sensitive Lands Regulations** **LU-1a:** Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-2 and BIO 1-4 in Section 5-4, Biological Resources.	**Environmentally Sensitive Lands Regulations** Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
LAND USE (cont.)			
	Future projects would be required to comply with the above regulations, policies, and mitigation. Therefore, at the program-level the CPU would not be in conflict with the purpose and intent of the ESL regulations and potential impacts would be below a level of significance.		
	Historical Resources Regulations Given the presence of historical resources distributed throughout the CPU area, implementation of the CPU has the potential to result in significant impacts to historical resources. The CPU includes several policies aimed to reduce impacts to historical resources within the CPU area as well as development regulations required for projects within areas covered by CPIOZ Type A which address archaeological resources. Additionally, incorporation of the mitigation framework for historical resources contained in Section 5.5 would reduce the potential for significant impacts at the project-level.	**Historical Resources Regulations** **LU-1b:** Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework HIST-1 in Section 5-5, Historical Archaeological Resources.	**Historical Resources Regulations** Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
LAND USE (cont.)			
Environmental Plan Consistency Would the CPU result in a conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan and the MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area?	**MHPA / Land Use Adjacency Guidelines** Potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. Implementation of the CPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact at the program-level.	**MHPA / Land Use Adjacency Guidelines** **LU-2:** All subsequent development projects that are implemented in accordance with the CPU which are adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent development project in an area adjacent to a designated MHPA, the City of San Diego shall identify specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA. Specific requirements of the mitigation framework are detailed in Section 5.1.6.3.	**MHPA / Land Use Adjacency Guidelines** Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
AIR QUALITY			
Criteria Pollutants Would the CPU result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation? Would the CPU result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state AAQS (including the release of emissions which exceed quantitative thresholds for ozone precursors)?	**Construction Emissions** Air emissions due to construction would not exceed the applicable thresholds for individual projects. However, if several of these projects were to occur simultaneously, there is the potential for multiple projects to exceed significance thresholds. While it is not anticipated that construction activities under the CPU would result in significant air quality impacts, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant and unavoidable.	**Construction Emissions** **AQ-1:** For future projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego.	**Construction Emissions** Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
AIR QUALITY (cont.)			
	Operational Emissions While emissions under the CPU would exceed project-level thresholds, which would potentially have a significant air quality impact when compared to the existing condition, the CPU would, however, result in lower emissions than the adopted plan. The CPU would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions used to develop the SDAPCD RAQS. However, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant and unavoidable.	**Operational Emissions** **AQ-2:** Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.	**Operational Emissions** Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
AIR QUALITY (cont.)			
Sensitive Receptors Would the CPU expose sensitive receptors to substantial pollutant concentration, including air toxics such as diesel particulates?	**Stationary Sources** The CPU includes industrial uses which could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact. Any new facility proposed that would have the potential to emit toxic air contaminants would be required to evaluate toxic air problems resulting from their facility's emissions. If the facility poses a potentially significant public health risk, the facility would submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Specific project-level design information would be needed to determine stationary source emission impacts. Therefore, at the program-level, impacts would be potentially significant.	**Stationary Sources** **AQ-3:** Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000; see Section 5.3.5.2 [b & c]) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within five years of the date the plan.	**Stationary Sources** Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
AIR QUALITY (cont.)			
	Collocation The CPU would place residential, commercial, and industrial uses in proximity to one another, which would have potential air quality impacts associated with the collocation of incompatible land uses, as described in Section 5.3.5.1 (d). Air Quality impacts would be associated with exposure to pollutants from the operation of the facility, which can include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. While compliance with the CPU and General Plan policies, along with local, state and federal regulations, would reduce potential impacts, future projects may result in sensitive uses (residential uses, schools, parks being located within the buffer distances of the facilities described in Table 5.3-7, and therefore sensitive receptors would be exposed to toxic air emissions. In this case, impacts would be significant.	**Collocation** **AQ-4:** Significant adverse impacts associated with collocation would be mitigated at the project-level, through implementation of the Mitigation Framework contained in Section 5.3.5.3.	**Collocation** Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
BIOLOGICAL RESOURCES			
Sensitive Plants and Animals Would the CPU result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?	Implementation of the CPU has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA.	Mitigation measures **BIO-1, BIO-2, BIO-4 and LU-2**, as described in Sections 5.1 Land use and 5.4, Biological Resources, would address impacts of future development projects related to sensitive plant and wildlife species.	Less than Significant
Migratory Wildlife Would the CPU result in interference with the nesting/foraging/ movement of any resident or migratory fish or wildlife species?	Future development, including construction or extension of CPU roadways, utility lines, and/or temporary construction activities, 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 would be considered significant.	Mitigation measures **BIO-2** under Section 5.4.5.3 shall apply.	Less than Significant
Sensitive Habitat Would the CPU result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetland, coastal sage scrub, or chaparral?	Impacts to Tier I, II, IIIA, and IIIB habitats would be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp.	Refer to Mitigation Framework **BIO-1**.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)			
MSCP Would the CPU affect the long-term conservation of biological resources as described in the MSCP? Would the CPU meet the objectives of the Subarea Plan's Land Use Adjacency Guidelines or conflict with the provisions of the Subarea Plan, or other approved local, regional, or state conservation plans?	***MHPA Land Use Adjacency Guidelines*** Potential impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. As implementation of the CPU would introduce land uses adjacent to MHPA, this is a potentially significant impact at the program-level.	***MHPA Land Use Adjacency Guidelines*** MHPA adjacency impacts would be addressed at the project-level; Section 5.1.6 includes the Mitigation Framework, **LU-2**.	***MHPA Land Use Adjacency Guidelines*** Less than significant
Invasive Plants Would the CPU result in the introduction of invasive species of plants into the area?	Due to the large extent of future grading and development within the CPU, the CPU has the potential to introduce invasive species into the MHPA. If uncontrolled, invasive species could significantly impact the integrity of the MHPA in the CPU area. .	All future projects would be required to implement the MHPA Land Use Adjacency Guidelines and Mitigation Framework measure **LU-2** in Section 5.1.6, Land Use, which requires that the project's landscape plan would not contain any exotic plant/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)			
Wetland Impacts Would the CPU result in an impact on City, state, or federally regulated wetlands (including but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filing, hydrological interruption, or other means?	Impacts to wetlands, vernal pools, and other jurisdictional water resources would be considered significant.	Mitigation framework **BIO-4**, as described in Section 5.4, Biological Resources, shall apply to future development.	Less than significant
Noise Generation Would the temporary construction noise from the CPU or permanent noise generators (including roads) adversely impact sensitive species (e.g., coastal California gnatcatcher) within the MHPA?	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.	Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU are included in Sections 5.1.6.3 (Land Use) and 5.4.4.3 (Biological Resources). Please refer to Mitigation Framework **BIO-1 through BIO-4 and LU-2** (MHPA Land Use Adjacency Guidelines).	Less than Significant
HISTORICAL RESOURCES			
Prehistoric/Historical Sites Would the CPU result in the alteration or destruction of a prehistoric or historical archaeological site?	Due to the number and density of prehistoric and historic cultural resources in the CPU area, the loss of these resources would be considered a significant impact at the program-level	**Archaeological Resources** Mitigation framework **HIST-1**, as described in Section 5.5, Historical Resources, shall apply for future development. **Historic Buildings, Structures, and Objects** Mitigation framework **HIST-2**, as described in Section 5.5, Historical Resources, shall apply for future development.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
HISTORICAL RESOURCES (cont.)			
Religious or Sacred Uses Would the CPU result in any impact to existing religious or sacred uses within the CPU area?	Impacts to known resources and those not yet found and formally recorded, could occur anywhere within the CPU area. Future grading of original in situ soils could also expose buried historical archaeological resources and features including sacred sites. Potential impacts to historical resources associated with construction of future projects implemented in accordance with the CPU, would be considered significant.	The Mitigation Framework religious or sacred uses would be the same as outlined for Archaeological Resources. Please refer to Mitigation Framework **HIST-1**.	Less than Significant
Human Remains Would the CPU result in the disturbance of any human remains, including those interred outside of formal cemeteries?	Impacts to known resources and those not yet found and formally recorded could occur anywhere within the CPU area. Future grading of original in situ soils could also expose buried human remains. Potential impacts to historical resources associated with construction of projects implemented in accordance with CPU would be considered significant.	The Mitigation Framework for human remains would be the same as outlined for Archaeological Resources. Please refer to Mitigation Framework **HIST-1**.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS			
Health and Safety Hazards Would the CPU expose people or property to health hazards, including wildfire and airport operations?	**Health Hazards** A discussion of exposure to health hazards is found in Section 5.3, Air Quality and Sections 5.6.4, and 5.6.5. As indicated in those sections, hazardous sites have been identified that could result in significant impacts to future development within the CPU area.	**Health Hazards** Refer to Sections 5.3, 5.6.4, and 5.6.5. In accordance with the CPU policies, mitigation identified in Section 5.6.5.3 would be required to reduce potential health hazards to future development from hazardous sites. Please refer to Mitigation Framework AQ-3, AQ-4, and **HAZ-3.**	**Health Hazards** Less than Significant
	Wildfire Hazards Because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. Therefore, impacts associated with wildfires would be significant at the program-level.	**Wildfire Hazards** **HAZ-1:** Future projects implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and CPU policies intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.	**Wildfire Hazards** Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS (cont.)			
	Aircraft Hazards Future projects could conflict with the FAA requirements unless the City implements a mechanism to ensure either the project wouldn't include features identified in Part 77 criteria for notification or the project obtains a No Hazard to Air Navigation from the FAA. Thus, potential aircraft hazards impacts would be potentially significant.	**Aircraft Hazards** Mitigation framework **HAZ-2**, as described in Section 5.6, Human Health/Public Safety/Hazardous Materials, shall apply for future development.	**Aircraft Hazards** Less than significant
Hazardous Sites Would the CPU uses be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	The presence of sites compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the CPU area.	Mitigation framework **HAZ-3**, as described in Section 5.6, shall apply to future development.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
HYDROLOGY/WATER QUALITY			
Runoff Would the CPU result in an increase in impervious surfaces and associated increased runoff? Would the CPU result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?	Buildout in accordance with the CPU would result in an increase in impervious surfaces and associated increased runoff, and result in alterations to on- and off-site drainage. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts associated with runoff and alternations to on-and off-site drainage patterns.	Mitigation framework **HYD/WQ-1**, as described in Section 5.7, Hydrology/Water Quality, shall apply for future development. Future development implemented in accordance with the CPU would be subject to the requirements of the Storm Water Standards Manual, which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework, which requires regulatory compliance as noted above, along with General Plan and CPU policy compliance for reducing storm water runoff, would ensure that potential impacts to downstream resources would be reduced to below a level of significance.	Less than Significant
Natural Drainage System What modifications to the natural drainage system would be required for implementation of the CPU? Would there be an effect on the Otay or Tijuana river valley drainage basins with implementation of the CPU?	Buildout in accordance with the CPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts to the natural drainage system.	See **HYD/WQ-1.**	Less than Significant
Flow Alteration Would the CPU result in alterations to the course or flow of flood waters?	Future development within the CPU area would potentially impact the existing course and flow of flood waters, resulting in potentially significant impacts.	See **HYD/WQ-1.**	Less than significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
HYDROLOGY/WATER QUALITY (cont.)			
Water Quality Would the CPU create discharges into surface or ground water, or any alteration of surface or ground water quality, including but not limited to temperature, dissolved oxygen or turbidity? Would there be increases in pollutant discharges including downstream sedimentation?	Future projects implemented in accordance with the CPU could result in impacts to water quality, including discharges to surface or groundwater. Although specific locations for future projects have not been identified, the construction of such facilities and, to a lesser degree, the operation of these facilities, could impact water quality. Grading and exposed soil could result in sedimentation.	Mitigation framework **HYD/WQ-2**, as described in Section 5.7, Hydrology/Water Quality, shall apply.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
GEOLOGY/SOILS			
Geologic Hazards Would the CPU expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?	The CPU area contains geologic conditions which would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils represent a potentially significant impact for future development.	Mitigation framework **GEO-1**, as described in Section 5.8, Geology and Soils, shall apply for future development.	Less than Significant
Erosion Would the land use and circulation modifications proposed in the CPU increase the potential for erosion of soils on- or off-site?	Based on the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPU area, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys.	Mitigation framework **GEO-2**, as described in Section 5.8, Geology and Soils, shall apply for future development.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
NOISE			
Traffic Generated Noise Would the CPU result in a significant increase in the existing ambient noise level?	Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road. Therefore, impacts related to traffic noise impacts to new residences would be significant. There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. This is a potentially significant impact of the CPU.	Mitigation framework **NOS-1** and **NOS-2**, as described in Section 5.10, Noise, shall apply for future development. However, because the extent of the success of this mitigation framework cannot be accurately predicted for at this time, impacts would be unavoidable at the program-level.	Significant and unavoidable
Stationary Source Noise (Collocation) Could the proposed collocation of residential and commercial or industrial land uses result in the exposure of people to noise levels, which exceed the City's Noise Abatement and Control Ordinance?	The CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts at this program-level of analysis.	Mitigation framework **NOS-3**, as described in Section 5.10, Noise, shall apply for future development. However, because the extent of the success of this mitigation framework cannot be accurately predicted for at this time, impacts would be unavoidable at the program-level.	Significant and unavoidable
Construction Noise Would temporary construction noise from the proposed neighborhood developments or permanent noise generators (including roads) adversely impact sensitive receptors or sensitive bird species (e.g., coastal California gnatcatcher) within the MHPA?	Future development associated with implementing the CPU has the potential to exceed applicable construction thresholds at residential properties adjacent to construction sites. Additionally, there is the potential for construction noise to impact least Bell's vireo, coastal California gnatcatcher, raptors, and other sensitive species if they are breeding or nesting in adjacent MHPA lands. These impacts are significant at the program-level.	Mitigation framework **NOS-4**, as described in Section 5.10, Noise, shall apply for future development.	Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
PALEONTOLOGICAL RESOURCES			
Would the CPU allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential?	Implementation of the CPU has the potential to result in significant impacts to paleontological resources. Specifically, future projects implemented in accordance with the CPU that would involve substantial grading within the San Diego and Otay formations and Very Old Paralic Deposits that would result in the loss of significant fossil remains. It should be noted however, that for future projects that are consistent with the OMCP, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.	Mitigation framework **PALEO-1**, as described in Section 5.11, Paleontological Resources, shall apply for future development.	Less than Significant

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
TRAFFIC/CIRCULATION			
Capacity Would the CPU result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system?	**Capacity** **Roadway Segments** A total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impact at all of these 24 roadway segment locations.	Even with the incorporation of the recommended street classifications in Table 5.12-4 in the CPU, Public Facilities Financing Plan, and future project development review and (ministerial) and discretionary review through the CPIOZ, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition. The TIA identified additional potential improvement measures that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements include various factors such as adjacency to environmentally sensitive land and/or steep hillsides, existing development conflicts, and/or multi-modal and urban design context. The impacts are considered significant and unmitigated. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. 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.	Significant and unmitigated

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
TRAFFIC/CIRCULATION (cont.)			
	Intersections A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition. Therefore, the CPU would have a significant impact at all 49 of these intersections.	Even with incorporation of the recommended land configurations shown in Figure 5.12-4a-4g for the 53 intersections analyzed into the projects to be funded through the Public Facilities Financing Plan, and through future development projects (ministerial and discretionary through the CPIOZ, a total of 39 intersections would continue to be significantly impacted. The TIA identified further potential improvement measures such as additional intersection turning movement lanes that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements due to considerations such as adjacency to environmentally sensitive land and/or steep hillsides, existing development conflicts, multi-modal and urban design context, or because additional study at the project level would be required in order to make recommendations. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. 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. To reduce impacts the following mitigation shall be provided:	Significant and unmitigated

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
TRAFFIC/CIRCULATION (cont.)			
		TRF-1: Intersections shall be improved per the intersection lane designations identified in Figure 5.12-4.	
	Freeway Segments With the planned and funded I-805 improvements, all I-805 freeway segments would be expected to operate at an acceptable LOS in the Horizon Year Plus CPU condition and therefore impacts would be less than significant. Five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition. Thus, the CPU impact at these five SR-905 freeway segments would be significant.	While providing one HOV lane in each direction on the SR-905 would reduce impacts associated with buildout of the CPU, the additional lanes are not funded; therefore, impacts would remain significant and unmitigated at the programmatic level. At the project-level, partial mitigation may be possible in the form of auxiliary lanes and/or transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. 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.	Significant and unmitigated
	Freeway Ramp Metering Five SR-905 freeway ramps would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition. The CPU impact at these five freeway ramps would be significant.	Mitigation that would reduce freeway ramp metering impacts at the five significantly impacted SR-905 locations consists of adding a lane to the freeway on-ramp, auxiliary lanes, and/or implementation of transportation demand management (TDM) measures that encourage carpooling and other alternate means of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in	Significant and unmitigated

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
TRAFFIC/CIRCULATION (cont.)			
		order to provide mitigation at the time of impact. However, due to the uncertainty associated with implementing freeway ramp improvements, and uncertainty related to implementation of TDM measures, the freeway ramp impacts associated with the CPU would remain significant and unmitigated at the program-level.	
UTILITIES			
Would the CPU result in a need for new systems, or require substantial alternations to existing utilities? These systems include water, wastewater, reclaimed water, solid waste disposal, storm water infrastructure, and communication systems.	**Solid Waste** Because all future projects within the CPU area may not be required to prepare a waste management plan or may not reduce project-level waste management impacts below a level of significance, the CPU cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste would be significant at the program-level.	**Solid Waste** Mitigation framework **UTIL-1**, as described in Section 5.14, Utilities, shall apply for future development. However, because the extent of the success of this mitigation framework cannot be accurately predicted for at this time, impacts would be unavoidable at the program-level.	**Solid Waste** Significant and unavoidable

TABLE S-1
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation Framework	Impact Level After Mitigation
GREENHOUSE GAS EMISSIONS			
Consistency with Adopted Plans, Policies, and Regulations Would the CPU conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	The CPU contains policies that would reduce GHG emissions from transportation and operational building uses (related to water and energy consumption, and solid waste generation, etc.) and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations. However, because project-level details are not known, there is the potential that projects would not meet the necessary City reduction goals put in place in order to achieve the reductions required by AB 32. Thus, the level of potential impacts associated with plan conflict would be potentially significant.	Mitigation framework **GHG-1**, as described in Section 5.18, Greenhouse Gas Emissions, shall apply for future development. However, because the extent of the success of this mitigation framework cannot be accurately predicted for at this time, impacts would be unavoidable at the program-level.	Significant and unavoidable
Cumulative GHG Emissions Would implementation of the CPU generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	The 9.1 to 11.4 percent reductions relative to BAU fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to BAU. This impact associated with GHG emissions under the CPU would be significant and unavoidable.	**GHG-2**: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation framework **GHG-1**.	Significant and unavoidable

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Final
Program Environmental Impact Report for the Otay Mesa Community Plan Update, City of San Diego
Project Number 30330/304032
SCH No. 2004651076

December 18, 2013

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I:	Noise Technical Report
J:	Transportation Analysis
K:	Service Letters
L:	Technical Infrastructure Study
M-1:	Water Supply Assessment Report
M-2:	Water Supply Assessment and Verification Report
N:	Greenhouse Gas Emissions Report
O:	Sheppard Mullin/Torrey Pines Bank Comment Letter (10/25/13) Exhibits

Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAQS	Ambient air quality standards
AASHTO	American Association of Highway and Transportation
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADD	Assistant Deputy Director
ADT	average daily traffic
AEOZ	Airport Environs Overlay Zone
AEP	Association of Environmental Professionals
AF	acre feet
AFY	acre feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
AQIP	Air Quality Improvement Program
APCD	San Diego County Air Pollution Control District
ASTM	American Society for Testing and Materials
B.P.	Before Present
BACT	best available control technology
BAU	business as usual
BMP	best management practice
BPRP	Business Park – Residential Permitted
BRT	South Bay bus rapid transit
CAA	Clean Air Act
CCAA	California Clean Air Act
CalARP	State of California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalRecycle	California Recycle
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCP	Cities for Climate Protection
CCR	California Code Regulation
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
cfs	cubic feet per second

CGS	California Geological Survey
CFR	Code of Federal Regulations
CIP	Capital Improvements Project
City	City of San Diego
CIWMB	California Integrated Waste Management Board
CLUP	Comprehensive Land Use Plan
CMAP	Climate Mitigation and Adaptation Plan
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CP	Community Plan
CPAP	Climate Protection Action Plan
CPIOZs	Community Plan Implementation Overlay Zones
CPTED	Crime Prevention Through Environmental Design
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRC	California Residential Code
CVESD	Chula Vista Elementary School District
dB	decibel
dB(A)	24-hour A-weighted average decibel level
DEH	Department of Environmental Health
DHS	California Department of Health Services
DMP	Drought Management Plan
DOE	Department of Energy
DOT	Department of Transportation
DPM	diesel-exhaust particulate matter
DSD	Development Services Department
DTSC	Department of Toxic Substances Control
du/ac	dwelling units per acre
EI	Expansion Index
EMS	Emergency Medical Services
EMT	emergency medical technician
EPCA	Energy Policy and Conservation Act
EPIC	Energy Policy Initiative Center
EO	Executive Order
EOC	Emergency Operations Center
ERNS	Emergency Response Notification System
ESA	Endangered Species Act of 1973
ESD	Environmental Services Department
ESL	Environmentally Sensitive Land
ESP	Emergency Storage Plan
FAA	Federal Aviation Administration
FAR	floor area ratio
FBA	Facilities Benefit Assessments
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highways Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FR	Federal Register

FY	fiscal year
GHG	Greenhouse Gas
GIS	Geographic information system
gpm	gallons per minute
HA	Tijuana Valley Hydrologic Area
HCM	Highway Capacity Manual
HCP	Historical Commemorative Program
HHI	Health Hazard Index
HMIRS	Hazardous Material Incident Report System
HMTS	Hazardous Materials Technical Study
HOV	High-occupancy vehicle
HRB	Historical Resources Board
HRA	Health Risk Assessment
HRG	Historical Resource Guidelines
HRR	Historical Resource Regulations
HSA	Hydrologic Subarea
HU	Hydrologic Unit
HVAC	heating, ventilating, and air conditioning
IA	Implementing Agreement
I-805	Interstate 805
IBT	International, Business and Trade
ICLEI	International Council for Local Environmental Initiatives
ICP	Integrated Contingency Plan
IID	Imperial Irrigation District
IRP	Integrated Resources Plan
ITP	Incidental Take Permits
ITS	intelligent transportation system
JEPA	Joint Exercise of Powers Agreement
kBTU	thousand British Thermal Units
kwh/yr	Kilowatts hours per year
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
LEA	Local enforcement agency
LEED	Leadership in Energy and Environmental Design
L_{eq}	one-hour, A-weighted equivalent sound level
LID	Low Impact Development
LNFZ	La Nación Fault Zone
LOMR-F	Letter of Map Revision based on Fill
LOS	level of service
LTRP	long-term energy resource plan
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
Metro	Metropolitan Sewerage System
MEIR	maximally exposed individual resident
MEIW	maximally exposed individual worker
mgd	million gallons per day
MHMP	Multi-hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MMC	Mitigation Monitoring Coordination Section
MMRP	Mitigation Monitoring and Reporting Program
$MMTCO_2E$	million metric tons of carbon dioxide equivalents

MOU	Memorandum of Understanding
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organizations
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
$MTCO_2E$	metric tons of carbon dioxide equivalents
MTDB	Metropolitan Transit Development Boards
MTS	San Diego Metropolitan Transit System
mw	megawatt
MWD	Metropolitan Water District
NAAQS	national ambient air quality standards
NCCP	Natural Communities Conservation Plan
NCFUA	North City Future Urbanizing Area
NFRAP	No Further Remedial Action Planned
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
Notice	Notice to Proceed
O_3	ozone
OES	Office of Emergency Services
OHWM	Ordinary High Water Mark
OMDD	Otay Mesa Development District
OMR	Office of Mine Reclamation
OMTS	Otay Mesa Trunk Sewer
OWD	Otay Water District
OVRP	Otay Valley Regional Park
OVTS	Otay Valley Trunk Sewer
Pb	lead
PCB	polychlorinated biphenyls
PDO	Planned District Ordinance
PDP	Planned Development Permit
PEIR	Program Environmental Impact Report
PFFP	Public Facility Financing Plan
PIL	Prime Industrial Lands
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
PMI	point of maximum impact
POE	Port of Entry
pph	person per household
ppm	parts per million
PRC	Public Resources Code
proposed CPU	Otay Mesa Community Plan Update
PUD	Public Utilities Department
RAQS	Regional Air Quality Standards
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act

RMP	Risk Management Plan
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SBWRP	South Bay Water Reclamation Plant
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCIC	South Coastal Information Center
SCP	Sustainable Community Program
Scoping Plan	Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SD&AE	San Diego and Arizona Eastern Railroad
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDPD	San Diego Police Department
SDRAA	San Diego County Regional Airport Authority
SDSSS	San Diego Seismic Safety Study
SFHA	Special Flood Hazard Area
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigations, and Cleanups
SMARA	Surface Mining and Reclamation Act
SMGB	State Mines and Geology Board
SoCalGas	Southern California Gas
SR	State Route
SUHSD	Sweetwater Union High School District
SWF/LF	Solid Waste Facilities/Landfill Site
SWIS	Solid Waste Information System
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SYSD	San Ysidro School District
TAC	toxic air contaminant
TCM	Transportation Control Measures
TCP	Traditional Cultural Properties
TDM	Transportation Demand Management
TIA	Traffic Impact Analysis
TMDL	Total Maximum Daily Load
TOD	Transit Oriented Development
UDC	Unified Disaster Council
URMP	Urban Water Management Plan
USC	United States Code
USDA	United States Department of Agriculture
U.S. EPA	United States Environmental Protection Agency
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service

USGS	United States Geological Survey
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
v/c	volume-to-capacity
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WMA	watershed management area
WMI	Watershed Management Initiative
WoS	Waters of the State
WoUS	Waters of the U.S.
WRMP	Water Resources Master Plan
WMP	Waste Management Plan
WSA	Water Supply Assessment
WSDRP	Water Shortage and Drought Response Plan
WURMP	Watershed Urban Runoff Management Plan

1.0 Introduction

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego for the Otay Mesa Community Plan Update (CPU) in compliance with the California Environmental Quality Act (CEQA) of 1970 as amended (Public Resources Code [PRC], Section 21000 et seq.), and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.). In addition, this PEIR has been prepared in accordance with City of San Diego Environmental Impact Report Guidelines (2005). The PEIR relies on the most recent City of San Diego Significance Determination Thresholds (January 2011d).

This PEIR addresses the environmental effects associated with adoption of an update to the 1981 Otay Mesa Community Plan; amendment to the General Plan; rezone ordinance to replace the Otay Mesa Development District (OMDD) with citywide zoning; Land Development Code (LDC) amendments and approval of an updated Public Facilities Financing Plan (PFFP). The CPU is a comprehensive update to the adopted plan and addresses substantial land use changes, both locally and regionally that have occurred over the past 25 years. The CPU is guided by the framework and policy direction in the City of San Diego General Plan (2008a) and reflects new citywide policies and programs from the General Plan for the CPU area. The CPU contains a land use plan and includes the following nine elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation, along with a chapter pertaining to Implementation.

The CPU would refine and implement the general vision and goals as expressed in the General Plan for the CPU area. The CPU would provide detailed neighborhood-specific land use, development design guidelines, policies, and numerous other mobility and local guidelines, incentives, and programs in accordance with the goals stated in the General Plan.

In conjunction with the CPU, a rezone would rescind the existing Otay Mesa Development District (OMDD), and make development regulations consistent with citywide zoning classifications. Amendments to the City's LDC also would be necessary to create new and revised implementing zones, including two new Community Plan Implementation Overlay Zones (CPIOZs). The CPU would additionally serve as the basis for guiding a variety of other actions, such as parkland acquisitions, transportation improvements, and public facilities.

The City's Community Plan Preparation Manual indicates that the EIR for each community plan may tier off the EIR prepared for the General Plan (City of San Diego 2008a). Therefore, it was determined that this EIR would be prepared as a PEIR and

incorporate by reference the Final PEIR for the General Plan (State Clearinghouse No. 2006091032) in its entirety. The Final General Plan PEIR is available for review at the City's Development Services Department, located at 1222 First Avenue, San Diego, California 92101.

1.1 Discretionary Actions Required to Implement the Plan

Discretionary actions required to implement the CPU, and included as part of the project for purposes of this PEIR, include: adoption of the CPU, approval of a General Plan Amendment, rescission of the OMDD and adoption of a rezone ordinance to replace the OMDD with citywide zoning, adoption of the PFFP, and amendments to the City's LDC to create new and revised implementing zones, including two new Community Plan Implementation Overlay Zones (CPIOZs), a new International Business Trade (IBT) zone to implement the IBT land use category and a new Business Park Residential Permitted (BPRP) zone (the IP-3-1) to implement the new BPRP land use designation. The CPU would also serve as the basis for guiding a variety of other future actions, such as parkland acquisitions, transportation improvements, and design and construction of required public facilities. Certification of the PEIR at a noticed public hearing (Process 5) and adoption of the MMRP would be required in conjunction with adoption of the CPU and associated actions.

1.2 EIR Legal Authority

1.2.1 Lead Agency

The City of San Diego is the Lead Agency for the CPU pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency which has the principal responsibility for carrying out or approving a project. As Lead Agency, the City of San Diego's Development Services Department Environmental Analysis Section conducted an environmental review of the CPU and determined that a PEIR was required. The analysis and findings in this document reflect the independent judgment of the City.

1.2.2 Responsible and Trustee Agencies

Implementation of the CPU may require subsequent actions involving responsible and trustee agencies. Responsible agencies, as defined pursuant to CEQA Guidelines Section 15381, are public agencies that may have discretionary approval authority for a project, and include, but are not limited to the United States Army Corps of Engineers

(USACE), United States Fish and Wildlife Service (USFWS), California Department of Transportation (Caltrans), San Diego Air Pollution Control District (APCD), San Diego County Regional Airport Authority, and San Diego Regional Water Quality Control Board (RWQCB).

Trustee agencies are defined in Section 15386 of the CEQA Guidelines as state agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California, including the California Department of Fish and Wildlife (CDFW). Discretionary approvals that may be required by these or other agencies are listed in Section 3.4.5.6 Future Actions.

A brief description of some of the primary responsible or trustee agencies that may have an interest in the CPU is provided below.

U.S. Army Corps of Engineers: The USACE has jurisdiction over development in or affecting the navigable waters of the United States, pursuant to two federal laws: The Rivers and Harbors Act of 1889 and the Clean Water Act, as amended. A "navigable water" is generally defined by a blue line as plotted on a United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to waters of the U.S. are subject to Section 404 of the Clean Water Act. Aggregate impacts to waters of the U.S. (defined as direct fill or indirect effects of fill) greater than one-half acre require a permit. All permits issued by the USACE are subject to consultation and/or review by the USFWS and the United States Environmental Protection Agency (U.S. EPA).

U.S. Fish and Wildlife Service: Acting under the federal Endangered Species Act (ESA), the USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as the USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, the USFWS would provide input to the USACE as part of the Section 404 process.

Within areas covered by the City of San Diego's MSCP Subarea Plan, the role of the USFWS is limited with respect to species covered under the Subarea Plan. For species covered by the Subarea Plan, the USFWS has granted take authorization to the City for listed species in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, the USFWS, and the CDFW in 1997. However, the City does not have "take" authority for any wetland species. In April 2010, the City relinquished coverage of seven vernal pool species under the City's Endangered Species Act, Section 10 Incidental Take Permit (ITP). The seven covered vernal pool species are: San Diego and Riverside fairy shrimp, Otay mesa mint, California Orcutt grass, San Diego button celery, San Diego mesa mint, and spreading navarettia. For future projects that are consistent with the City's MSCP, the City, therefore, has authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP covered species list,

the wildlife agencies retain permit authority. In addition, the USFWS along with CDFW must approve MHPA boundary line adjustments.

California Department of Fish and Wildlife: The CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to Section 1600 et seq. of the State Fish and Game Code. The CDFW generally evaluates information gathered during preparation of the environmental documentation, and attempts to satisfy their permit concerns in these documents. Where state listed threatened or endangered species not covered by the City's MSCP occur on a project site, the CDFW would be responsible for the issuance of a Memorandum of Understanding (MOU) to ensure the conservation, enhancement, protection, and restoration of state listed threatened or endangered species and their habitats. Along with the USFWS, the CDFW must approve any MHPA boundary line adjustments.

California Department of Transportation: The CPU area is bisected by two major freeway routes (i.e., State Route 905 [SR-905] and SR-125). Caltrans approval would be required for any encroachments into Caltrans right-of-way by future projects.

San Diego Air Pollution Control District: The County Board of Supervisors sits as the Board of the APCD, which is an agency that regulates sources of air pollution within the county. This is accomplished through an integrated monitoring, engineering, and compliance operation, each of which is a separate division and each is designed to protect the public from the adverse impacts of polluted air. The APCD would be responsible for issuing permits for construction and operation of future projects.

San Diego County Regional Airport Authority: The San Diego County Regional Airport Authority (SDRAA) operates the airports and plans for the region's air transportation needs. The Airport Authority also serves as San Diego County's Airport Land Use Commission, responsible for land use planning concerning public safety surrounding airports. The Airport Authority updated the Brown Field Airport Land Use Compatibility Plan (ALUCP) in December 2010. As a responsible agency, the Airport Authority will review future development proposals within the CPU area and make "consistency determinations" with the provisions and policies with the ALUCP for Brown Field. Section 132.1550 of the City's Municipal Code provides further guidance regarding reviews within the purview of the SDRAA.

San Diego Regional Water Quality Control Board: The San Diego Regional Water Quality Control Board regulates water quality through the Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CA 0108758, which consists of wastewater discharge requirements.

1.3 Purpose and Use of Program Environmental Impact Report (PEIR)

1.3.1 PEIR Purpose

The purpose of this PEIR is to:

- Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, unavoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved a project in the manner the agency chose if significant environmental effects are involved.

1.3.2 Intended Uses of the PEIR

1.3.2.1 Inform and Disclose

As Lead Agency, the City has determined that a PEIR shall be prepared for the CPU pursuant to the CEQA Guidelines (Section 15168). This PEIR provides decision-makers, public agencies, and the public with detailed information about the potential significant adverse environmental impacts of the CPU. By recognizing the environmental impacts of the CPU, decision-makers will have a better understanding of the physical and environmental changes that would accompany the approval of the CPU. The PEIR includes recommended mitigation measures which, when implemented, would lessen impacts and provide the Lead Agency with ways to substantially lessen or avoid significant effects of the CPU on the environment, whenever feasible. Alternatives to the CPU are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the CPU.

1.3.2.2 Environmental Review for Future Actions

In accordance with CEQA Guidelines, a PEIR may serve as the EIR for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects.

Subsequent implementing actions associated with the CPU may include, but are not limited to, amendments to the PFFP, rezoning, subdivision maps, specific plans, planned development permits, site development permits, development agreements, Multi-Habitat Planning Area (MHPA) boundary line adjustments, establishment of public facilities financing mechanisms, formation of community facilities districts, and infrastructure improvement plans.

In accordance with State CEQA Guidelines Section 15168(c), when subsequent activities within the CPU area are proposed, the Lead Agency will examine those activities to determine whether the effects have been adequately addressed in the PEIR. If the Lead Agency determines that the activity is within the scope of the program examined in the PEIR, that no effects not already examined in the PEIR could occur, and that no new information shows that new mitigation measures or alternatives are required, the agency may approve the activity as being within the scope of the PEIR, and no additional environmental documentation would be required [14 CCR 15168(c)(1)-(2)]. If the subsequent activities would have effects not analyzed in the PEIR, then further environmental review would be required pursuant to the CEQA Statues and Guidelines. The determination of the appropriate type of environmental documentation would be made by the Lead Agency. The PEIR may be used as a basis for future Initial Studies to evaluate potential impacts of future activities. In addition, it may be used as a first-tier EIR for later environmental documents, thereby focusing later review of projects on specific environmental effects of those projects that were not fully evaluated in the PEIR. It may also serve as a database for the environmental setting, cumulative impacts, project alternatives, and other sections of later, project-specific environmental documents. In this way, the PEIR will streamline and focus future project-specific environmental documents on just those impacts that were not previously analyzed.

Community Plan implementation would require subsequent approval of public or private development proposals (referred to as “future development” in this PEIR) to carry out the land use plan and demonstrate compliance with policies presented in the CPU. The process for accomplishing environmental review for individual future development projects would include submittal of additional information in accordance with the supplemental regulations of CPIOZ Type A to determine if biological, archaeological, or paleontological resources are present on a project site, or if a specific use exceeds the traffic generation threshold. If not, the project can proceed through the ministerial process. If a future action does not meet the CPIOZ Type A, then the project would be processed under CPIOZ Type B application, which requires preparation of an initial study in accordance with CEQA to screen for consistency with the development regulations and the CPU, and to determine whether the potential impacts of the development were anticipated in the PEIR analysis. Depending on the conclusions of the initial study, a determination would be made as to whether the project is consistent and can rely on the PEIR or if a Negative Declaration, Mitigated Negative Declaration; or Addendum, Supplemental or Focused EIR would be required for the project.

Pursuant to State CEQA Guidelines Section 15168(c), the certified PEIR would satisfy CEQA requirements for subsequent activities if the following conditions can be met:

- Pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required (Section 15168(c)(2)); and
- All feasible mitigation measures or alternatives identified in the Program EIR will be incorporated (Section 15168(c)(3)).

Section 15162(a) of the State CEQA Guidelines allows a previous EIR to be used in approving a subsequent activity addressed in the previous EIR, as long as none of the following conditions apply:

- Substantial changes are proposed to the project which will require major revisions to the EIR due to the involvement of new significant impacts or a substantial increase in the severity of previously identified significant impacts (Section 15162(a)(1));
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions to the previous EIR due to the involvement of new significant impacts or a substantial increase in the severity of previously identified significant impacts (Section 15162(a)(2)); or
- New information of substantial importance is identified, which was not known and could not have been known at the time the original EIR was certified, and that information shows any of the following (Section 15162(a)(3)):
    - Project will have one or more significant effects not discussed in the original EIR (Section 15162(a)(3)(A));
    - Significant effects previously identified will be substantially more severe than identified in the previous EIR (Section 15162(a)(3)(B));
    - Mitigation measures or alternatives determined to be infeasible in the previous EIR would now be feasible, and the applicant declines to implement them (Section 15162(a)(3)(C)); or
    - Mitigation measures or alternatives, which are considerably different from those identified in the previous EIR, would substantially reduce one or more significant effects, and the applicant declines to implement them (Section 15162(a)(3)(D)).

Preparation of project-level technical studies may be required when certain conditions apply to project-specific activities under the CPU, as described in this PEIR and Mitigation Framework within Section 11, Mitigation Monitoring and Reporting Program (MMRP). Any required project-specific technical studies would be used to determine whether such activity is within the scope of the PEIR and whether the PEIR adequately describes the activity for CEQA purposes.

1.4 PEIR Review Process

The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, while the second stage is the Final PEIR.

1.4.1 Draft PEIR

The Draft PEIR is distributed for review to the public and interested and affected agencies for a review period for the purpose of providing comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (Section 15204, CEQA Guidelines). In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft PEIR a Notice of Completion is filed with the State Office of Planning and Research and Notice of Availability of the Draft PEIR is issued in a newspaper of general circulation in the area.

1.4.2 Final PEIR

Following the end of the public review period, the City will provide written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088 and will consider all comments in making its decision. Detailed responses to the comments received during public review, a MMRP, Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unavoidable will be prepared and compiled as part of the PEIR finalization process. The Final PEIR will be made available for public review at least 14 days prior to the first public hearing in order to provide the public and those that commented on the DEIR the opportunity to review the written responses to their comment letters. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR, and adopt the MMRP, Findings of Fact and Statement of Overriding Consideration as being complete and in accordance with CEQA.

1.5 Scope, Content, and Organization

1.5.1 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City of San Diego as a result of scoping meetings during a public outreach process that began in 2002, and responses to the third Notice of Preparation (NOP) dated October 1, 2010. The NOP, associated responses, and comments made during the scoping meeting are included as

Appendix A of this PEIR. Through these scoping activities, the CPU was determined to have the potential to result in the following significant environmental impacts:

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

The intent of the analysis section of this PEIR is to determine whether implementation of the CPU would have a significant effect on the environment through analysis of the issues identified during the scoping process. A significant effect on the environment is defined as a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (CEQA Guidelines Section 15382).

Pursuant to CEQA Guidelines Section 15126, all components of the CPU are considered in this PEIR when evaluating its potential impacts on the environment. Impacts are identified as direct or indirect, short-term or long-term, and assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the CPU compared to existing ground conditions.

1.5.2 Type of EIR

This Program EIR contains a programmatic level analysis of the CPU described in Section 3.0, Project Description. Pursuant to Section 15168 of the State CEQA Guidelines, a Program EIR is prepared on a series of actions that can be characterized as one large project and related either:

- Geographically,
- As logical parts in the chain of contemplated actions,
- In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

In accordance with CEQA, this PEIR examines the environmental impacts of the CPU, which entails a series of actions. The combined actions that would result from implementation of the plan can be characterized as one large project for the purpose of this study and will be used, to the extent feasible, to avoid duplicative review. Consequently, the PEIR focuses primarily on the physical changes in the environment that would result from implementation of the CPU, including all phases of planning, as well as anticipated general impacts that could result during future construction and operational activities.

1.5.3 PEIR Organization

1.5.3.1 Chapter Summary

The chapter organization and content of this PEIR follow the direction in the City's EIR Guidelines. A brief overview of the various sections of this PEIR is provided below:

- **Executive Summary.** Provides a summary of the PEIR, a brief description of the CPU, identification of areas of controversy, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. A summary of the analyzed alternatives and comparison of the potential impacts of the alternatives with those of the CPU is also provided.

- **Section 1.0, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.

- **Section 2.0, Environmental Setting.** Provides a description of the regional context, location, and existing physical characteristics and land use at the CPU. Available public infrastructure and services, as well as relationship to relevant plans, is also provided in this section.

- **Section 3.0, Project Description.** Provides a detailed discussion of the CPU, including background, objectives, key features, and environmental design

considerations. The discretionary actions required to implement the CPU, and a chronicle of project changes, are also included.

- **Section 4.0, History of Project Changes.** Describes the physical changes that have been made to the CPU in response to environmental concerns raised during review of the project.

- **Section 5.0, Environmental Analysis.** Provides a detailed evaluation of potential environmental impacts for several environmental and land use issues. Section 5.0 begins with the issue of land use, followed by the remaining issues. Each environmental issue area includes: a description of the existing conditions and regulations relevant to each environmental topic; presentation of threshold(s) of significance for the particular issue area under evaluation, based on the City's 2011 Significance Determination Thresholds; identification of an issue statement; an assessment of any impacts associated with implementation of the CPU; a summary of the significance of any project impacts; mitigation measures to avoid or reduce potentially significant adverse environmental impacts; and a conclusion of significance after mitigation for each significant issue area.

- **Section 6.0, Cumulative Impacts.** Identifies the impact of the CPU in combination with other planned future development in the region.

- **Section 7.0, Growth Inducement.** Evaluates the potential influence the CPU may have on economic or population growth within the CPU area as well as the region, either directly or indirectly.

- **Section 8.0, Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant, and briefly summarizes the basis for these determinations.

- **Section 9.0, Significant Unavoidable Environmental Effects/Significant Irreversible Environmental Changes.** Discusses any significant unavoidable impacts of the CPU, which would remain significant and unavoidable even after project mitigation. This section also describes the potentially significant irreversible changes that may be expected with development of the CPU and addresses the use of nonrenewable resources during its construction and operational life.

- **Section 10.0, Alternatives.** Section 10.0 includes a discussion of alternatives which could avoid or reduce potentially significant environmental impacts associated with implementation of the CPU. Alternatives addressed in the EIR include a No Project Alternative, a Reduced Biological Impacts Alternative, and a Reduced Density Alternative. Pursuant to the CEQA Guidelines, the adopted 1981 community plan (as amended to reflect implementation of Precise Plans

and the MSCP) represents the No Project Alternative. These alternatives provide the range of alternatives, which will enable the decision makers to select any one of the alternatives or a hybrid of them.

- **Section 11.0, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the PEIR and required as part of the CPU.
- **Section 12.0, References Cited.** Lists all of the reference materials cited in the PEIR.
- **Section 13.0, Individuals and Agencies Consulted.** Identifies all of the individuals and agencies contacted during preparation of the PEIR.
- **Section 14.0, Certification Page.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the PEIR.

1.5.3.2 Technical Appendices

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR, and are included as appendices to this PEIR. The technical reports and their location in the PEIR are listed in the table of contents.

1.5.3.3 Incorporation by Reference

An extensive base of environmental review is relevant to the PEIR for the CPU. These documents are listed below. They are hereby incorporated by reference in their entirety and are available for review at the City of San Diego's Development Services Department, 1222 First Avenue, San Diego, CA 92101.

- City of San Diego General Plan (2008) and Strategic Framework Element (2002)
- Final Program EIR for the City of San Diego General Plan (2008) (SCH #2006091032)
- Strategic Framework Plan Final EIR (SCH #2001061069)
- Housing Element (FY 2013-2020)
- Otay Mesa Community Plan and Final PEIR (April 1981)
- MSCP Subarea Plan (1997)
- State Route 905 Final EIS/EIR (SCH # 95031031)
- Otay Mesa Trunk Sewer Final EIR (SCH #2004071167)
- Otay Valley Regional Park Trails Project MND (SCH #2006041064)

- Program EIR for the Otay Water District Water Resources Master Plan Update (SCH #2008101127)
- Precise Plans (California Terraces, Dennery Ranch, Hidden Trails, Riviera Del Sol, Remington Hills, Robin Ridge, Santee Investments, Otay International Center)

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2.0 Environmental Setting

2.1 Regional Context

The CPU area encompasses approximately 9,302~~00~~ acres located in the southeastern portion of the City of San Diego just north of the United States International Border with Mexico (Figure 2-1). Multiple jurisdictions govern land surrounding Otay Mesa, including but not limited to City of San Diego, City of Chula Vista, County of San Diego, and City of Tijuana, Baja California, Mexico. Additionally, federal and state facilities exist within and adjacent to the CPU area (Figure 2-2). As described below, the topography, land use, transportation, and infrastructure are entwined among these jurisdictions.

2.2 Project Location

The CPU area is bounded by the Otay River Valley and the City of Chula Vista on the north; an unincorporated area of San Diego County to the east; the U.S. International Border and the City of Tijuana on the south; and Interstate 805 (I-805) on the west. The communities of San Ysidro, Otay Mesa-Nestor, and the Tijuana River Valley in the City of San Diego are located west of the CPU area (see Figure 2-2). In addition, the Nakano property, which is located in the most northwestern corner of Otay Mesa, south of the Otay River Valley is directly adjacent to, but not a part of the CPU. This property is within the City of Chula Vista's land use authority, ~~but~~ and is only shown on figures ~~throughout~~ within this chapter of the PEIR for context and ~~is~~ delineated with dashed lines.

2.3 Existing Physical Characteristics

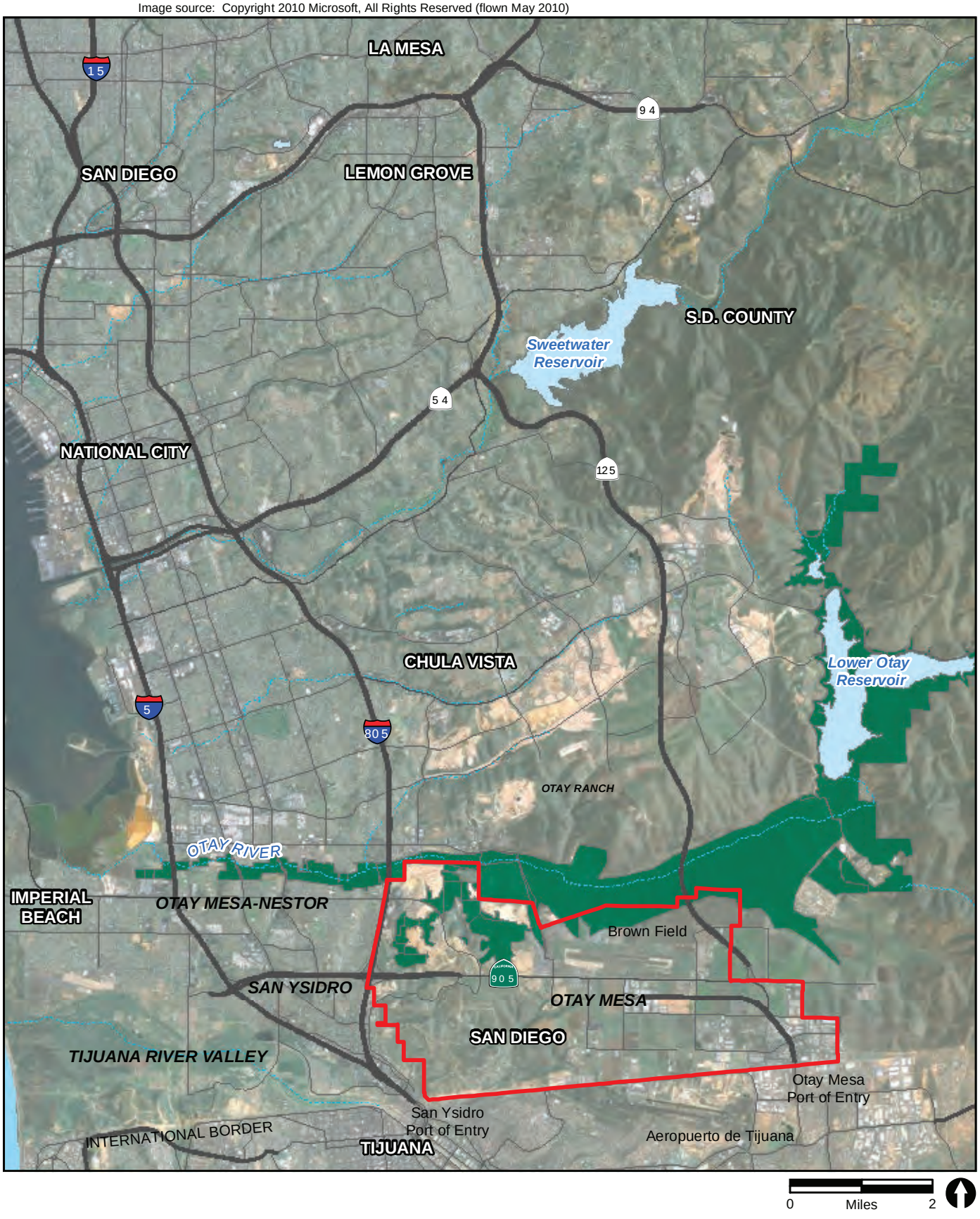
The environmental setting of the CPU area is briefly described below. Section 5.0 of this PEIR provides additional, more specific information relating to Otay Mesa's current environmental and regulatory setting pertaining to agriculture, mineral resources, air quality, biological resources, historical resources, land use, transportation, visual and neighborhood character, geology/soils, hazards, hydrology, noise, paleontological resources, population and housing, public services and facilities, utilities, water supply, and water quality.



Otay Mesa Community Plan Boundary

FIGURE 2-1

Regional Location of Otay Mesa Community Plan Area



Otay Mesa Community Plan Boundary

Otay Valley Regional Park (Approximate Boundary)

FIGURE 2-2
Regional Context of
Otay Mesa Community Plan Area

2.3.1 Geography/Topography

Otay Mesa is characterized as a flat mesa or “tableland” broken by irregular bluffs and canyons, along with smaller finger canyons that drain north into the Otay River Valley and south to the Tijuana River. The Otay River flows from the San Miguel Mountains to the west through Upper and Lower Otay reservoirs and empties into the San Diego Bay. The Otay River floodplain is located just north of the CPU area (Figure 2-3). The moderate slopes of the Otay River Valley become steep bluffs near the mesa inside the CPU area. Several major canyons, such as O'Neal, Johnson, and Dennery, drain into the Otay River. Moody Canyon and Spring Canyon serve as the major drainage system into the Tijuana River to the southwest. The Tijuana River flows mainly through Mexico, crosses the border into the City of San Diego, and empties into the Pacific Ocean in an estuary in the City of Imperial Beach. The Tijuana River Watershed Urban Runoff Management Program (County of San Diego 2008) and San Diego Bay Watershed Urban Runoff Management Program (San Diego Unified Port District 2008) addressed threats to water quality and beneficial uses. (See Section 5.7 for further discussion of hydrology and water quality and an exhibit of the watersheds.)

As described above, Otay Mesa is characterized by flat terrain cut by canyons that drain either north to the Otay River or south to the Tijuana River. The CPU area gradually increases in elevation from approximately 330 feet above mean sea level (AMSL) at the west side to more than 600 feet AMSL at the east side. Steeply sloping canyons rim the mesa on the north (O’Neal, Johnson, and Dennery) and west (Moody, Spring). In addition, several finger canyons are offshoots to these major canyons and further dissect this area. The eastern portion of the CPU area is characterized by low gently rolling hills that increase in elevation (Figure 2-4).

2.3.2 Land Use

2.3.2.1 On-site Land Use

Existing land uses in the CPU area include residential communities in the northwest portion of the CPU area and a few dispersed residences throughout the CPU area. Brown Field, a general aviation airport operated by the City of San Diego, is situated in the central portion of the CPU area north of Otay Mesa Road and SR-905. Industrial/commercial uses and automobile salvage yards are concentrated in an area west of Brown Field. The International Border with Mexico and Otay Mesa Point of Entry (POE) are located in the southeast portion of the CPU area. Other institutional uses include the San Ysidro High School and elementary and middle schools in the northwestern portion of the CPU area. Southwestern College operates a new Higher Education Center in the southeast portion of the CPU area.

Image source: SanGIS (flown May 2012)

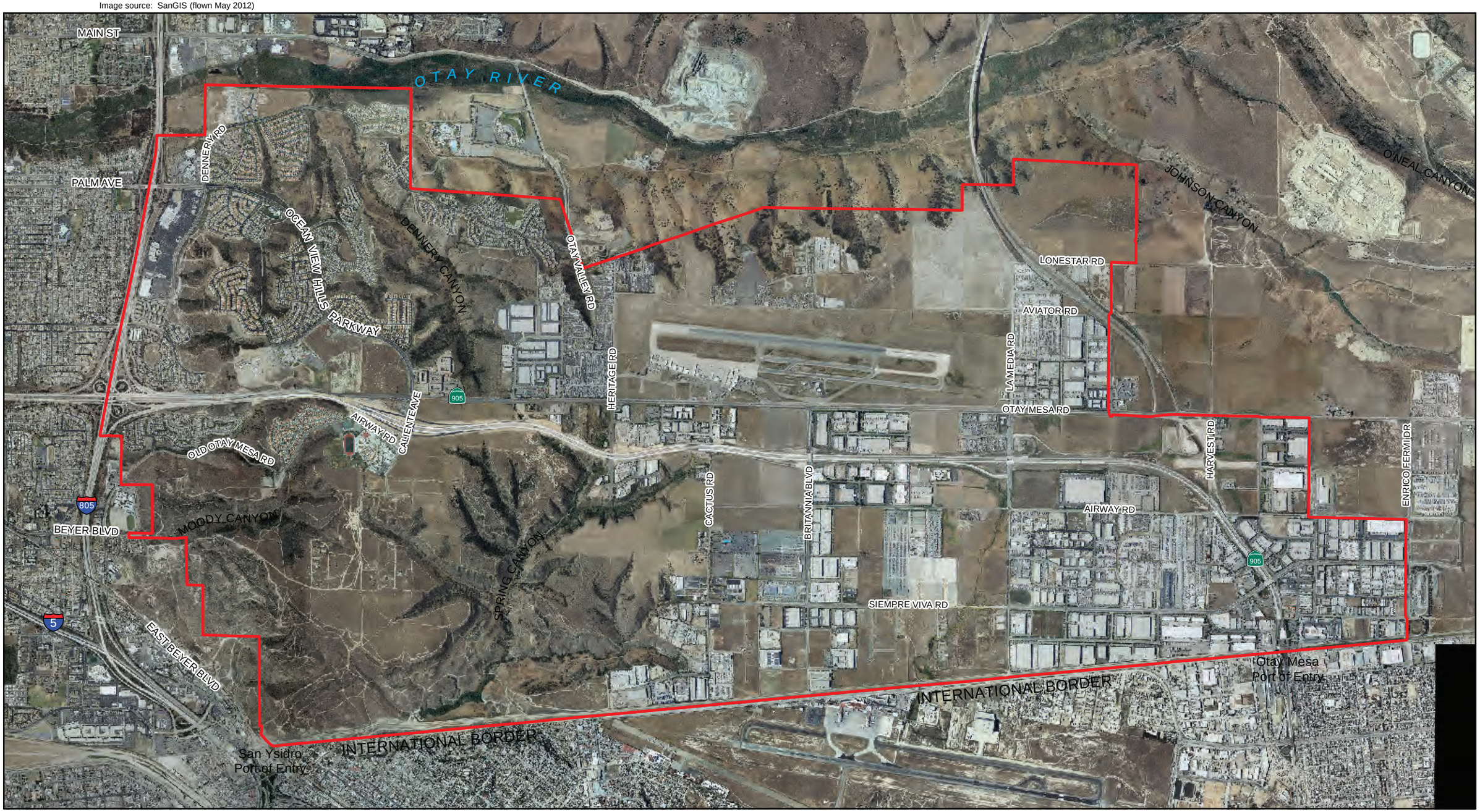


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FIGURE 2-3
Aerial Photograph

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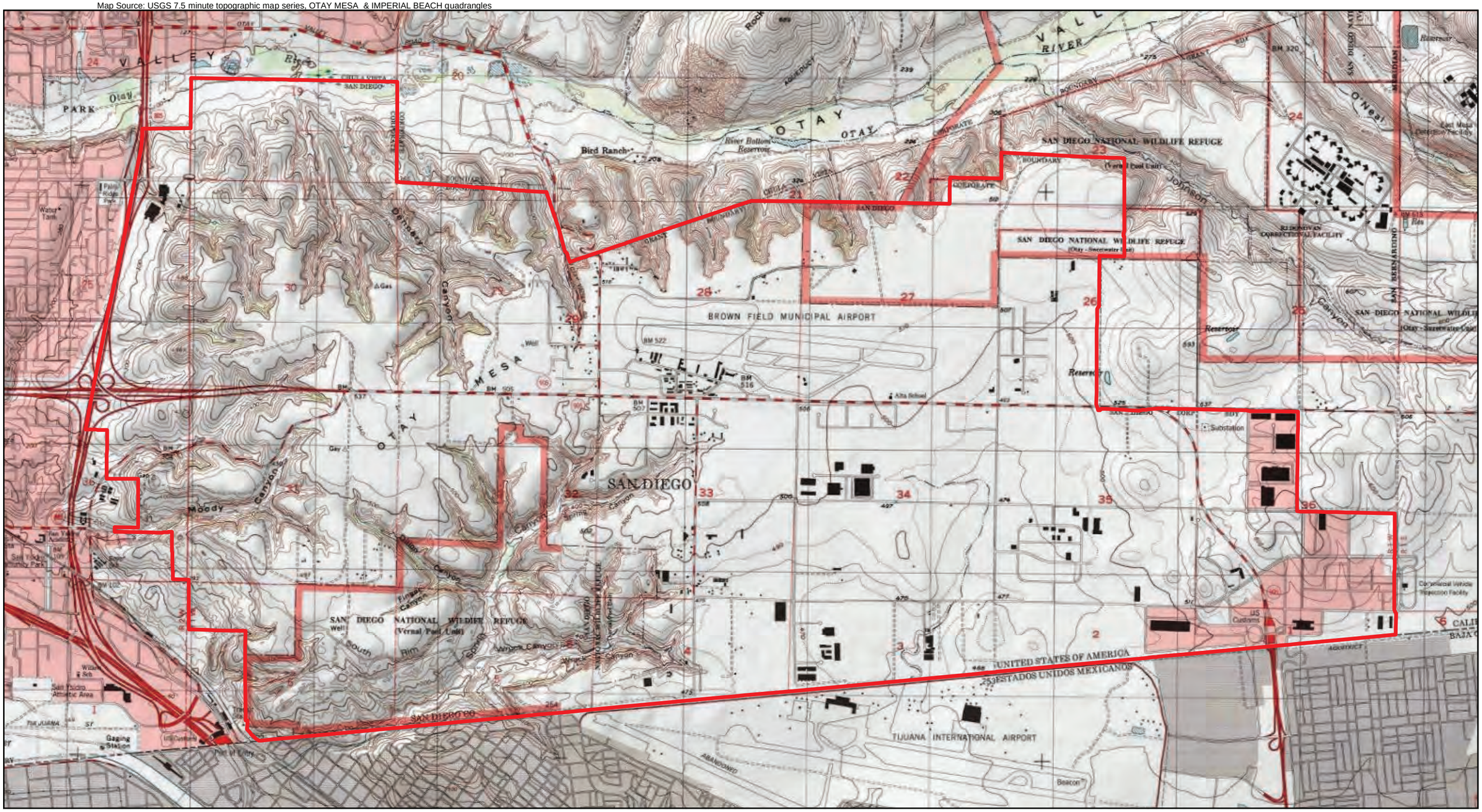
Map Source: USGS 7.5 minute topographic map series, OTAY MESA & IMPERIAL BEACH quadrangles



Otay Mesa Community Plan Boundary

San Diego National Wildlife Refuge Boundary

FIGURE 2-4

Otay Mesa Community Plan Area Location on USGS Map

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Historically, Otay Mesa was used for agriculture and livestock grazing purposes. However, developments such as the maquiladora program in the 1960s and opening of the POE in 1985 have contributed toward the changing land use in Otay Mesa over the past few decades. The maquiladora program allows manufacturing plants in Mexico to import raw material and parts from the U.S. and then export products, relying on lower-cost Mexican labor for assembly and manufacturing of goods (subsequently further influenced by the North American Free Trade Agreement (NAFTA) ratification and implementation). Businesses in the United States serve as a base of operations for maquiladora industries. This has contributed to the economic development of the San Diego-Tijuana region.

A significant number of the industrial establishments provide critical support to more than 700 production-sharing companies in Tijuana, including electronic, automotive, furniture, and medical supplies. In addition, some non-Mexico-related manufacturers and distributors have begun relocating to Otay Mesa from other parts of southern California because of the comparatively lower land costs and industrial lease rates. Recent examples include Factory-2-U, Crower Cams & Equipment, Coast Citrus, Trepco West, Golden Oak Furniture, and NASSCO.

The opening of the Otay Mesa POE in 1985 further enhanced trade in Otay Mesa when northbound commercial traffic was directed to the Otay Mesa POE. After the Mexican government decided in 1994 to move all southbound commercial cargo to the Otay Mesa POE, the Otay Mesa POE became the largest commercial land crossing between California and Mexico and handles the third largest volume of trucks with more than 1.4 million truck crossings per year along the United States–Mexico border. The Otay Mesa POE is the twenty-fifth busiest port in the United States. This movement of goods and truck traffic has an important influence on the development of industry and transportation patterns in the area.

To help meet future growth in the area, a new Otay Mesa East POE and SR-11 freeway link are planned to be located in the unincorporated area of the county about 2 miles to the east of the Otay Mesa POE. With an anticipated opening in 2015, this new POE will provide an alternate entry for commercial traffic that currently is limited to the Otay Mesa POE.

There are two airports of regional importance in the Otay Mesa area: Brown Field in the City and General Abelardo L. Rodriguez International Airport in Tijuana. Brown Field is a general aviation airport and serves as a POE for private aircraft entering the U.S., as well as a base for Customs and Border Protection aerial patrols of the border. Brown Field is owned and operated by the City of San Diego and is located in the CPU area. General Abelardo L. Rodriguez International Airport, operated by a private Mexico-based company, is a passenger and cargo airport located just south of the International Border in Mexico.

Although Otay Mesa has primarily been associated with the POE and industrial businesses (as described above) that comprise much of the central and eastern portion of the community, Otay Mesa has also seen a significant growth in its residential population within the last decade. From 2000 to 2010, the total residential population of Otay Mesa increased from 1,740 to 13,446 and now comprises approximately one percent of the City's population of 1.3 million residents. This significant population increase has been the result primarily of single-family residential development in the western portion of the community. The developments in the western portion of the CPU area have been implemented via seven precise plans and one Planned Residential Development Permit (approved since 1981), as illustrated on Figure 2-5, and described below:

- **California Terraces** Precise Plan comprises approximately 665 acres within the northwest portion of Otay Mesa. At buildout, California Terraces will contain 4,002 residential dwelling units and approximately 20 acres of commercial development.

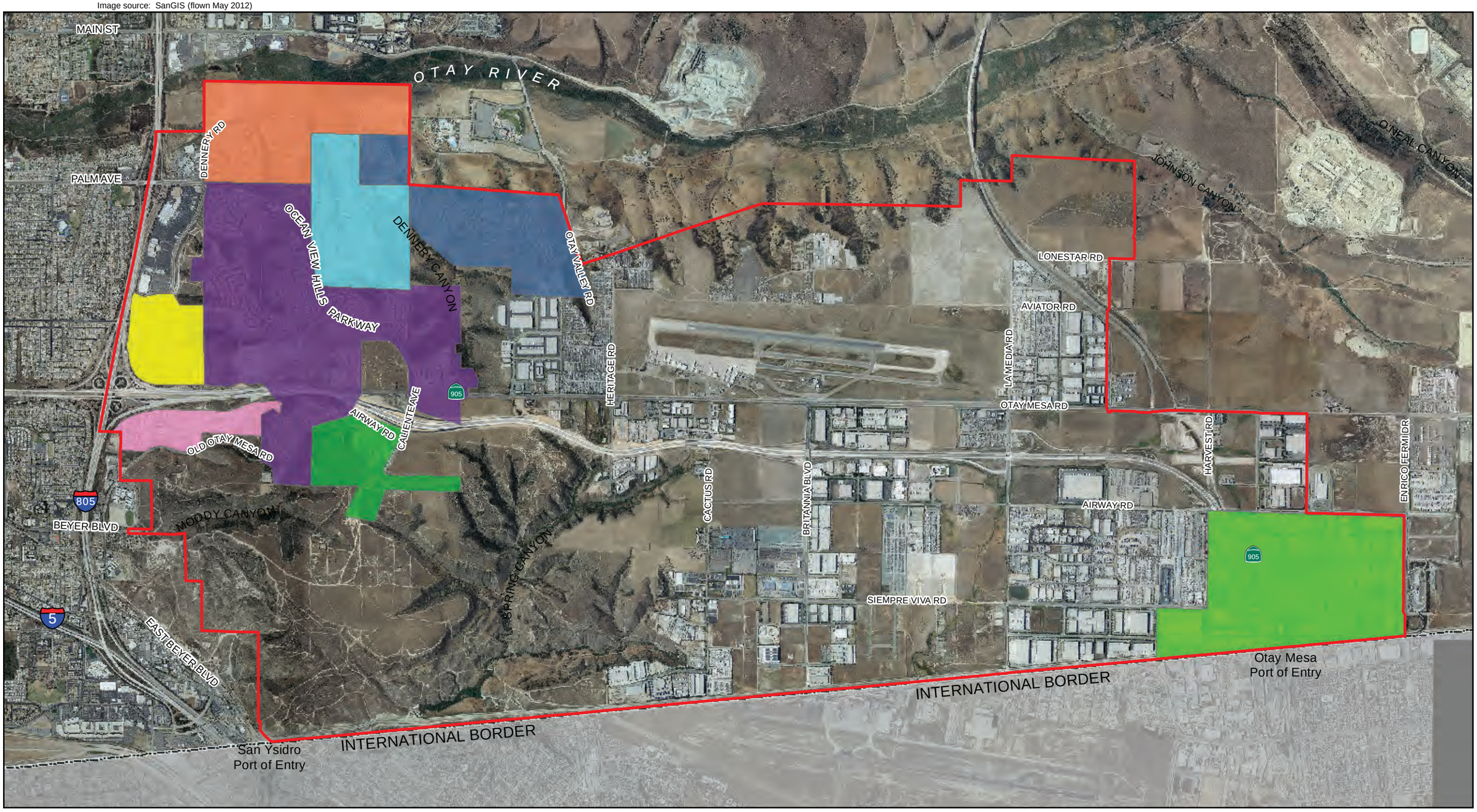
- **Dennery Ranch** is the northern-most precise plan within Otay Mesa. The approximately 268-acre site is located east of I-805 and north of Palm Avenue. The plan allows for the development of 509 single-family and 820 multi-family residential dwelling units.

- The **Hidden Trails** Precise Plan area is comprised of approximately 208 acres that is bounded by the Dennery Ranch Precise Plan area to the north, the Robinhood Ridge Precise Plan area to the east, and the California Terraces Precise Plan area to the south and west. The plan allows for the development of 205 single-family and 224 multi-family dwelling units.

- The **Riviera Del Sol** Precise Plan is located to the west of California Terraces and south of the Palm Plaza Walmart, totaling 103.6 acres of development. There are 123 single-family and 630 multi-family residential dwelling units in Riviera Del Sol developed across 79 acres. The Precise Plan also designates 3 acres for industrial use, which is occupied by a self-storage facility along the plan's western edge. The remaining acreage is dedicated for parks and open space.

- **Remington Hills** is located south of Riviera Del Sol and south of SR-905. Through a Planned Residential Development Permit, the approximately 100-acre area is developed with 252 single-family residential dwelling units.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Adopted Precise Plan Areas

- California Terraces
- Dennery Ranch
- Hidden Trails
- Otay International Center
- Remington Hills
- Riviera Del Sol
- Robinhood Ridge
- Santee Investments

0 Feet 2,500

FIGURE 2-5

Adopted Precise Plan Areas

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- The **Robinhood Ridge** Precise Plan area comprises 278 acres located directly north of the Otay Corporate Center. The plan includes 486 single-family and 433 multi-family residential dwelling units, as well as a 6-acre park site, approximately 3 acres of commercial land, and approximately 5 acres of industrial lands.

- The **Santee Investments** Precise Plan area is located south of the SR-905 and encompasses approximately 130 acres. The residential and commercial components of the plan have not been developed, while the approximately 47-acre site for the senior high school is developed and operating as San Ysidro High School.

- The **Otay International Center** Precise Plan located in the POE area surrounds the Otay Mesa International Border crossing station. The Otay International Center consists of industrial and commercial development on approximately 470 acres situated adjacent to the Mexico border in the south-central portion of the CPU.

While development has been occurring in the CPU area, many parcels still remain vacant. The pace and sequence of development envisioned by the adopted community plan has not been realized, as industrial uses have been slower to develop with many interim uses occurring. Residential development in the western portion of the CPU area has increased more rapidly in recent years. Overall, land use in the CPU area consists of a mixture of business, industrial, warehousing, manufacturing, residential, open space, agriculture, and public facilities. Existing land uses are described in Section 5.1, Land Use, illustrated on Figure 5.1-1 and enumerated in Table 5.1-1. Prior to adoption of the MSCP, projections in the adopted community plan estimated 18,200 housing units and 40,000 industrial-related jobs (City of San Diego 1981). The MSCP reduced the estimated units to approximately 12,400. According to current estimates (2012), the CPU area contained a resident population of 15,323 with 2,745 single dwelling units and 1,468 multiple dwelling units (San Diego Association of Governments [SANDAG] 2012b).

Most of the undeveloped areas within the CPU area designated for development are currently zoned for agricultural uses (A-1-10) with the exception of Brown Field, which is unzoned. Small areas are zoned for residential use (R-1-5) and various commercially zoned areas are located in the western portion of the CPU area.

2.3.2.2 Surrounding Land Use

The communities of Otay Mesa-Nestor and San Ysidro are adjacent to the CPU area's western border. Much of the development in proximity to the CPU is single-family residential.

Much of the CPU area's northern border is located in the Otay Valley Regional Park (OVRP). The OVRP extends about 13 miles inland from the southeastern edge of the salt ponds at the mouth of the Otay River, through the Otay River Valley, to the land surrounding both Lower and Upper Otay lakes. The City of Chula Vista lies beyond the OVRP to the north of the CPU.

Land to the east of the CPU area is within the unincorporated area of San Diego County and is mostly undeveloped. Located on 780 acres of unincorporated land northeast of the CPU area, in the County of San Diego, is the Richard J. Donovan Correctional Facility, a state-operated medium-high security facility. Also located in the vicinity is a County-operated detention facility.

To the south of the CPU area is the International Border and the City of Tijuana, Baja California, Mexico.

2.3.3 Transportation

2.3.3.1 Freeways and Regional Access

Three highways provide regional access to the CPU area, along with a fourth highway, currently being planned. Currently, I-805 on the western border of the CPU area provides access in a north/south direction to Otay Mesa. The South Bay Expressway is an extension of SR-125 from SR-54 in Spring Valley to SR-905 in Otay Mesa. The South Bay Expressway operates as a toll road under SANDAG. SR-905 connects the Otay Mesa POE with regional freeways I-5 and I-805. In concert with the future Otay Mesa East POE, Caltrans is planning for SR-11, a four-lane freeway which would connect the future Otay Mesa East POE with SR-905 and SR-125. In Mexico, this corridor would connect the new POE to the Tijuana-Tecate and Tijuana-Ensenada free and toll roads. The new POE and 3-mile four-lane segment of SR-11, which connects the U.S./Mexico border to SR-905, is scheduled to be completed in 2015.

2.3.3.2 Roadways

The CPU area's basic grid system consists of several major corridors that provide transit, connect activity centers, and service the Otay Mesa POE. The major north-south corridors include Britannia Boulevard and La Media Road, which are designated truck routes that service the international industries and the POE on a daily basis. The east-west major corridors include Otay Mesa Road, Airway Road, and Siempre Viva Road. Airway Road is considered the spine of the community, currently providing two discontinuous east-west segments for Otay Mesa that incorporate transit and bike routes to service the residential and workforce population of Otay Mesa. Otay Mesa Road is a busy six-lane street that parallels SR-905. Beyond the major corridor system, the existing network follows a development pattern that incorporated pocketed

neighborhoods throughout the canyon systems in the northwestern portion of the CPU area.

2.3.3.3 Alternative Transportation

Otay Mesa is currently served by Metropolitan Transit System (MTS) local bus service routes 933/934 in the northwestern CPU area and 905/905A along Otay Mesa Road, Britannia Boulevard, Airway Road, and Siempre Viva Road. MTS also provides trolley service along I-5 to the west of the CPU area.

In addition to MTS service, bikeways and pedestrian sidewalks exist within CPU area. There are existing bikeways along Old Otay Mesa Road, portions of SR-905, Dennery Road, Ocean View Hills Parkway, Del Sol Boulevard, portions of Siempre Viva Road, Heinrick Hertz, Paseo de las Americas, a portion of Enrico Fermi Drive, and Roll Drive within the CPU area. Sidewalks exist within the residential developments in the western CPU area, and are located along some commercial and industrial property frontages. Informal trails exist throughout the CPU area; however, these trails are not designated and often are on private property.

2.3.4 Historical Resources

Habitation sites, temporary camps, lithic scatters, quarry, shell middens, and non-sites are resource types defined for the CPU. Three of these site types dominate the CPU area: habitation sites, artifact scatters/temporary camps, and lithic scatters. There are a total of 262 historic and prehistoric sites/structures recorded within the CPU area boundaries. Seven of the 262 recorded structures/sites within the CPU have been designated as Historical Landmarks by the City of San Diego Historical Resources Board (HRB). In addition, there are 56 isolates filed at the South Coast Information Center (SCIC). These isolates consist of one or two prehistoric artifacts. There is no evidence of a sacred site or burial within the CPU area and there are no known human remains in the CPU area.

2.3.5 Biological Resources

Undeveloped portions of the CPU area are part of a diverse biological area containing habitats of limited distribution, supporting endangered and threatened plant and animal species. There are 13 vegetation communities and land cover types present in the CPU area: riparian scrub, freshwater marsh, vernal pool, basin with fairy shrimp, coastal sage scrub, native grassland, maritime succulent scrub, non-native grassland, southern mixed chaparral, developed/ornamental, disturbed, agriculture, and eucalyptus woodland. Vernal pools, which are highly specialized habitat that support sensitive species, are found in portions of the CPU area. The canyon areas contain maritime succulent scrub and coastal sage scrub vegetation communities which are also of limited distribution in

the region. These canyons serve as wildlife corridors that form a network extending to the Otay River Valley, a biological resource of regional importance. For the most part, the canyons are part of the City's MHPA. Sensitive resources in the CPU area are described in Section 5.4.

2.3.6 Geology and Paleontology

Based on review of published geologic documents and geotechnical reports, and soil and geologic features observed during the field reconnaissance, the CPU area is underlain by three surficial soil deposits and three geologic formations. The geologic formations include Pleistocene Very Old Paralic Deposits (formerly the Lindavista Formation), Upper Pliocene San Diego Formation, and Pliocene Otay Formation. The surficial soils include artificial fill (unmapped), topsoil/colluvium (unmapped), and alluvium.

Large complex landslide deposits have been mapped along the southwest, west, and northwest edges of Otay Mesa, and on both sides of the International Border with Mexico. Suspected landslides, inferred from topography, along canyon sidewalls were also mapped during field reconnaissance. The Very Old Paralic Deposits geologic formation has moderate paleontological resource sensitivity. Both the San Diego and Otay formations have high paleontological resource sensitivity. Other soils found in the CPU area (undocumented fills, topsoil, slopewash, and alluvium) are considered to have a low potential for paleontological resources.

2.3.7 Drainage

Most of the CPU area drains to the south across the border with Mexico and eventually into the Tijuana River. A small portion flows north into the Otay River, and the far western part of the CPU area flows to the west through San Ysidro and then into the Tijuana River. The three drainage areas found in the Otay Mesa Study Area are Otay Valley, San Ysidro, and Water Tanks. Otay Valley covers north of Otay Mesa around the Otay River, San Ysidro covers west of Otay Mesa, and Water Tanks covers south of Otay Mesa. Otay Valley and Water Tanks are subdivided into east and west areas, respectively. ~~The CPU area is subdivided into five drainage areas, which includes all of the CPU area except for the far northwest portion, which is fully developed. The drainage area boundaries are not well defined because much of the CPU area is very flat. There are very few defined natural drainage paths, with much of the runoff sheet flowing across the CPU area.~~ The five drainage areas which comprise the CPU area, and their approximate acreages, are listed below:

- Otay Valley East (827.5)
- Otay Valley West (1,378.4)
- San Ysidro (1,226.1)

- Water Tanks East (3,380.2)
- Water Tanks West (2,488)
- ~~West Perimeter Drainage Area (258 acres)~~
- ~~West Drainage Area (2,190 acres)~~
- ~~North Perimeter Drainage Area (590 acres)~~
- ~~East Drainage Area (3,864 acres)~~
- ~~Border Crossing Drainage area (223 acres)~~

The existing drainage system throughout the CPU area comprises a combination of storm drains, improved channels, and detention basins, which in many areas discharge to natural drainages.

2.3.8 Water Quality

According to the 2010 State Impaired Water Bodies 303(d) List of Water Quality Limited Segments, several impaired water bodies exist with the CPU area. The Tijuana River Basin 911.1 is listed as an impaired water body for eutrophic, indicator bacteria, low dissolved oxygen, pesticides, phosphorus, sedimentation/siltation, selenium, surfactants, solids, synthetic organics, total nitrogen, toxicity, trace elements, and trash. The Otay River Basin 910.2 is listed as an impaired water body for chloride, sulfates, total dissolved solids, selenium, and toxicity.

2.3.9 Air Quality/Climate

The CPU area is located in the San Diego Air Basin (SDAB) about 6 miles east of the Pacific Ocean. The CPU area, like the rest of San Diego County's coastal areas, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

The CPU area is currently a source of anthropogenic greenhouse gases, with emissions generated by vehicular traffic and by the energy use, water use and solid waste disposal practices of the existing buildings.

2.4 Infrastructure and Public Services

2.4.1 Water and Sewer Infrastructure

The primary wholesale water supplier to the southern California metropolitan area is the Metropolitan Water District (MWD) of Southern California. Within San Diego County, the San Diego County Water Authority (SDCWA) is the regional wholesaler to the various retail water agencies, including the City of San Diego and Otay Water Districts. The City of San Diego Public Utilities Department (PUD) provides water to the western portion of the CPU area. The eastern section of the CPU area is served by the Otay Water District (OWD), which also supplies water in the unincorporated areas of the County and in the City of Chula Vista. (See Sections 5.14 and 5.15, Utilities and Water Supply, respectively, for additional information and exhibit of service areas.)

The OWD Water Resources Master Plan (WRMP) outlines a comprehensive program for the orderly and phased development of potable and recycled water supply, storage, transmission, and distribution through ultimate buildout of the land within the OWD, according to local land use approvals and planning. The improvement identified in the WRMP consist mostly of pipelines, reservoirs, and pump stations that are needed based on population projections, OWD criteria for the adequacy of facilities, and specific development plans in the OWD's service area. The OWD water model was updated in November 2010 as part of the 2010 WRMP Update to include increased potable water demands from the CPU. The WRMP Update determined that the increased potable water demands associated with the CPU would not warrant transmission main upgrades above those previously identified for the forecasted growth in the area.

The City PUD is responsible for wastewater service within the CPU area. Wastewater service to the CPU area is currently provided through the Otay Mesa sewer collection system via the Otay Mesa Trunk Sewer, the Otay Valley Trunk Sewer (OVTS) system, and Metropolitan Sewerage System (Metro). The Metro facilities include the San Ysidro Interceptor, the South Metro Interceptor, and the City's wastewater treatment facilities. The Otay Mesa Trunk Sewer has been planned for expansion to accommodate growth in the CPU area.

The wastewater from the eastern portion of the Otay Mesa Drainage Basin is currently collected via sewer pipelines ranging from 6 to 33 inches and conveyed to a 30-inch main in Siempre Viva Road. The 7.3-mile-long OVTS conveys flows from Heritage Road, along Otay Valley Road, to I-805, along local roads to the South Metro Receptor. The OVTS bottleneck in Heritage Road has a capacity of 4.3 million gallons per day (mgd) and is nearing capacity.

The Otay Mesa Trunk Sewer (OMTS) has been partially constructed to relieve the OVTS capacity. Currently the OMTS includes the 27- and 30-inch gravity sewer in Siempre

Viva Road that is pumped to the OVTS on an interim basis via Pump Station 23T. In addition, a 42-inch gravity sewer in Old Otay Mesa Road connects to a 10-inch main in Old Otay Mesa Road on an interim basis. SR-905 includes pipeline sleeves at Cactus Road to allow for future upgrades of this system.

2.4.2 Public Services

Existing public facilities, including parks, recreation centers, libraries, schools, fire, and police, serve the project area. The following provides a brief discussion of the existing and planned services and facilities that serve the community. The locations and capacity of these facilities are discussed in more detail in Section 5.13, Public Services and Facilities.

2.4.2.1 Fire Protection Services

Fire protection services for the CPU area are provided by the City of San Diego Fire-Rescue Department (SDFD). SDFD Fire Station Number (No.) 43, located on the eastern end of Brown Field at 1590 La Media Road, serves the eastern portion of the plan area. As of 2011, the western portion of the community, north of I-905, is served by Fire Station No. 6, located in the adjacent Otay Mesa-Nestor community planning area. The remaining portion of the CPU area, south of I-905, is served by Fire Station No. 29, located in the San Ysidro community planning area. In addition, the CPU identifies the planned construction of Fire Station No. 49, which would provide emergency response coverage to the west end of the CPU area. Each fire station is equipped with at least one engine and four firefighters per day, per shift. In addition, Emergency Medical Services of the SDFD has ambulances, paramedics, and emergency medical technicians who respond to emergency calls.

A fire services deployment planning study was prepared for the City to further refine the findings of the Regional Fire Service Deployment Study conducted for the County of San Diego, analyze whether the SDFD performance measures are appropriate and achievable given the risks, topography and special hazards to be protected in the City, and review existing SDFD deployment staffing models for efficiency and effectiveness and determine how and where alternative deployment and staffing models could be beneficial to address current and projected needs (Citygate Associates LLC 2011).

2.4.2.2 Police Protection Services

Police services for the CPU area are provided by the City of San Diego Police Department (SDPD). The CPU area is within Beat 713 of the Southern Division. The Southern Division is located at 1120 27th Street and serves the neighborhoods of Otay Mesa, Otay Mesa West, Tijuana River Valley, San Ysidro, Border, Egger Highlands, Nestor, Palm City, and Ocean Crest. There are 84 sworn personnel at the Southern

Division and 1 civilian employee. The current patrol strength is 79 uniformed officers. The SDPD does not staff individual stations based on population ratios. The current citywide staffing goal and budgeted staffing ratio for police officers to population is 1.48 officers per 1,000 residents.

2.4.2.3 Schools

Three school districts serve the CPU area: the Sweetwater Union High School District, the San Ysidro School District, and the Chula Vista Elementary School District. As of 2013, there are four schools operating within the CPU area: Ocean View Hills School (K-8), Vista Del Mar Elementary School (opened in 2012, K-5), San Ysidro High School (grades 9-12), and Southwestern Community College Higher Education Center. San Ysidro Middle School (grades 6-8) and Beyer Elementary School (K-5) are located outside of the CPU area to the west, but those living in the CPU area may attend these schools.

2.4.2.4 Library Services

The City operates a central library located in downtown San Diego and 34 branch libraries in neighborhoods throughout the City. There are currently no branch libraries within the CPU area. Primary library service is provided by the Otay Mesa-Nestor Branch Library located at 3003 Coronado Avenue, west of I-805. This library is 15,000 square feet. Library service is also provided by the San Ysidro Branch Library, located at 101 W. San Ysidro Boulevard.

2.4.2.5 Parks and Recreation

The City's Park and Recreation Department maintains more than 40,000 acres of developed and undeveloped open space and parkland categorized as population-based parks, resource-based parks, and open space. As of 2012, there are 2,678 acres combined of parkland and open space (98 and 2,580 acres, respectively) within the CPU area. This acreage is comprised of neighborhood, community, and resource-based parks, as well as open space lands which provide recreation opportunities, as discussed below.

Currently, there are two existing neighborhood parks within the CPU area: Vista Pacifica and Ocean View Hills. Vista Pacifica is a 6.9-acre park located in the Robinhood Ridge Precise Plan area of the CPU. Ocean View Hills is a 5.1-acre park located on Ocean View Hills Parkway. As discussed in Section 5.13, the adopted PFFP identifies three neighborhood parks within the northwestern portion of the CPU area that are planned for construction: Dennery Ranch, Riviera del Sol, and Hidden Trails (City of San Diego 2006a).

There is one recently developed community park in the CPU area. The approximately 15-acre Pacific Breezes Community Park is located adjacent to the 5-acre joint use area within the Ocean View Hills School, north of SR-905, and consists of a 17,000-square-foot recreational building, skate park, comfort station, and swimming complex. In addition, there is one community park planned for future construction in the CPU area. Beyer Community Park is scheduled for completion in 2018 and will provide 7.5 usable acres of recreation. Although the Beyer Community Park would be located in the adjacent San Ysidro community, it would serve both the communities of Otay Mesa and San Ysidro.

The Ocean View Hills School (K-8) site contains a 5-acre joint use recreation facility which includes turfed, multipurpose sports fields. This facility is available for community use pursuant to a 25-year Joint Use Agreement, which expires in 2030, with the San Ysidro School District.

OVRP is an important resource-based park located in the northwest portion of the CPU area. Approximately 206 acres of OVRP are within the CPU area. OVRP provides recreational opportunities ranging from playing fields and picnic areas to hiking, biking, and horse trails. At the same time, the park protects open space, wildlife, historic, agricultural, and archaeological resources. There are plans for multi-use areas and an extensive trail system within the park's boundaries.

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3.0 Project Description

The CPU is an update to the adopted 1981 Otay Mesa Community Plan. Approval of the CPU would establish land use designations and policies to guide future development consistent with the City's General Plan (2008a). The CPU is intended to implement the General Plan policies through the provision of community-specific recommendations. The concurrent rezone would rescind the OMDD and update zoning regulations within the CPU area. Amendments to the LDC also would be required to create implementing zones for proposed commercial and industrial land use designations under the CPU. An updated PFFP would be adopted with the CPU to allow for implementation of the CPU.

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

3.1 Purpose and Need for the CPU

3.1.1 Purpose

The City has undertaken the CPU to address changes in conditions since 1981, when the Otay Mesa Community Plan was adopted to guide development through the year 2000. As such, it is intended to define new strategies for the way Otay Mesa would develop and function ~~over the next 20–50 years.~~through an assumed buildout year of 2062. With adoption of the General Plan in 2008, the CPU would also serve as a means of carrying out the Guiding Principles of the General Plan as they pertain to the Otay Mesa community. Thus, the CPU would ensure implementation of the General Plan with respect to the distribution and arrangement of land uses (public and private), local street and transit network, prioritization and provision of public facilities, community and site-specific urban design guidelines, and recommendations to preserve and enhance natural and cultural resources within the Otay Mesa community.

Of particular relevance is the City of Villages strategy which strives to respect the open space network and to increase the housing supply and diversity through development of compact, mixed-use villages in specific areas that are linked to an improved regional transit system integrated into the larger community. Village strategies include creating housing near jobs/employment centers and transit with a compact pedestrian-friendly orientation.

3.1.2 Need

The focus of the adopted 1981 plan was annexation of Otay Mesa into the City of San Diego which would allow the City to benefit from the planned second POE, now the Otay Mesa POE. According to the adopted plan, a principal purpose for designating industrial lands (also designated a foreign trade zone) was to accommodate the "twin plants" concept. The twin plants concept envisioned initial manufacturing with less costly labor in Mexico and final assembly in the United States when more skilled labor and sophisticated production facilities would be needed. To date, the twin plants concept has never been fully realized, as very little manufacturing actually occurs in the United States in proximity to the Mexican *maquiladoras*. In actuality, some of the raw material inputs for the *maquiladoras* are transported through Otay Mesa and finished goods are then shipped into the United States through Otay Mesa or other nearby POEs. Much of the industrial land that has been developed is occupied by warehousing, distribution, truck depots, and customs brokerages, thus differing from that assumed and planned for in the adopted community plan.

The adopted community plan established a goal to develop Brown Field as a cargo airport to stimulate industrial opportunities in Otay Mesa. Due to constraints on cargo aircraft operations by the nearby San Ysidro Mountains, community opposition to increased noise, and concern over fiscal impacts to the City of San Diego, a proposal to provide cargo operations at Brown Field was rejected by the City Council in the mid-1990s and again in the early 2000s. In addition, freight and passenger rail service that was envisioned to be extended into the CPU area has not occurred and current regional transportation plans (including the 2050 RTP [SANDAG 2011]) do not contemplate an expansion of rail service into Otay Mesa.

The adopted community plan also intended for Otay Mesa to develop in a phased manner. The phasing plan contemplated the western residential areas to develop first, but actual development occurred in reverse of this phasing plan. Residential development has only occurred since the late 1990s. The phasing plan also proved to be unsuccessful in guiding or predicting the timing and location of industrial development which occurred earlier than anticipated. Additionally, unlike the residential areas; development within industrial areas has been relatively scattered, occurring on a piecemeal basis. This has created a situation where road improvements, required of property owners at the time of permit issuance, have been constructed only along the property frontage where development occurred. The scattered pattern of development resulted in missing roadway segments to crucial network elements that hampered circulation in Otay Mesa.

At a regional level, the freeway system improvements have and will continue to change the CPU area from the 1981 plan. The southern portion of SR-125 that extends from SR-54 to Otay Mesa Road was completed in 2007. This portion of SR-125 is a toll road

and provides a regional connection from Otay Mesa, through the cities of Chula Vista, Lemon Grove, La Mesa and El Cajon, to the City of Santee. SR-905 opened to motorists July 30, 2012. The improvements consist of a six-lane freeway extending 6.4 miles from just east of I-805 to Britannia Boulevard, and complete the connection from the POE to I-805. Two more phases of improvements to SR-905 are planned: construction of the SR-905/SR-125 interchange and completion of the Heritage interchange ramp.

The area to the east of the CPU area, known as East Otay Mesa, was designated as a future growth and annexation area in the adopted community plan. It was not annexed along with the CPU area in 1981, and the County of San Diego has now adopted the East Otay Mesa Specific Plan that envisions over 2,000 acres of technology park, business park and industrial land uses. The East Otay Mesa Specific Plan accommodates a new East Otay Mesa POE to be accessed by a tolled freeway (future SR-11).

As described above, much has changed over the past 32 years since the adoption of the Otay Mesa Community Plan. The changing characteristics of industry, the need for more housing, the need for more middle income jobs, and a better understanding of the transportation – land use connection, have created a need for a more integrated land use plan. The CPU was therefore undertaken by the City to address present and future trends through assumed buildout year 2062~~2030~~, consistent with the General Plan.

3.2 Relationship to General Plan

The General Plan adopted in 2008 does not change land use designations or zoning on individual properties, but rather provides policy direction for future community plan updates, discretionary project review, and implementation programs. It provides a citywide vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define the City of San Diego. The CPU would build upon the goals and strategies in the General Plan and guide the future development of its neighborhoods. The CPU is intended to further express General Plan policies through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide zoning. Specific General Plan policies are referenced within the CPU to emphasize their significance in the community, but all applicable General Plan policies may be cited in conjunction with the CPU. The two documents work together to establish the framework for growth and development in the CPU area. The Municipal Code implements the community plan policies and recommendations through zoning and development regulations. This PEIR provides analysis and evaluation of all relevant land use and environmental issues associated with the CPU and Rezone.

3.3 CPU Objectives

The following specific objectives for the CPU support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the CPU are to:

- **Regional Center**: Enhance Otay Mesa's role as a bi-national regional center.
- **Economic Diversification**: Broaden the economic profile to increase employment and growth opportunities.
- **Industrial Capacity**: Enhance and sustain Otay Mesa's strong economic base and potential for expansion.
- **International Trade**: Support activities that promote greater interregional and bi-national activities.
- **Housing:** Provide more and varied housing and meet workforce needs close to employment centers.
- **Complete Places**: Create balanced, integrated mix of uses in Otay Mesa while minimizing collocation compatibility issues.
- **Transit:** Coordinate land use planning with high frequency transit service planning.
- **Open Space**: Protect the canyon lands, adjacent mesa tops, and sensitive biological resources while providing recreational opportunities.
- **Infrastructure:** Include financing mechanisms that can secure infrastructure improvements concurrent with development.
- **Environmental Leadership and Sustainability:** Follow environmentally sensitive design and sustainable development practices.

The above objectives are specific to the Otay Mesa planning area, and are intended to implement the broader goals, policies, and Guiding Principles of the General Plan. Following are the Guiding Principles of the General Plan.

- An open space network formed by parks, canyons, river valleys, habitats, beaches and ocean;
- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;

- An integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High-quality, affordable, and well-maintained public facilities to serve the City's population, workers, and visitors:
- Historic districts and sites that respect our heritage;
- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and
- A high aesthetic standard.

3.4 CPU Components

3.4.1 Overview of CPU

As stated in the CPU,

> Otay Mesa is envisioned as a diverse international community due to its proximity to the US/Mexico border. A mixture of industry, business, commercial, housing, recreation, education, services and civic uses make up this vibrant community. The long-term needs in the region for business and residential uses will be achieved in Otay Mesa through careful long-range planning.

The CPU builds on the adopted community plan in terms of land uses. For example, the CPU incorporates the existing land uses and densities for newly developed or approved neighborhoods such as Ocean View Hills, Robinhood Ridge, California Terraces, Dennery Ranch, and Hidden Trails. These areas are expected to remain relatively stable during the planning horizon. Except for the Central Village Specific Planning Area, the eastern area's industrial and commercial uses would remain, with the update providing refined designations to diversify for industrial and commercial uses.

The CPU strives to create villages, activity centers, and industrial/employment centers along major transportation corridors (Figure 3-1); while also supporting international trade functions of the Otay Mesa POE and taking into consideration surrounding regional and bi-national planning activities and trends affecting the CPU. Major land use revisions focus on redesignating land uses to increase the number of allowed residential units while achieving a more balanced community through integration of housing and appropriate employment lands. New land use designations are proposed to allow the

Map Source: City of San Diego

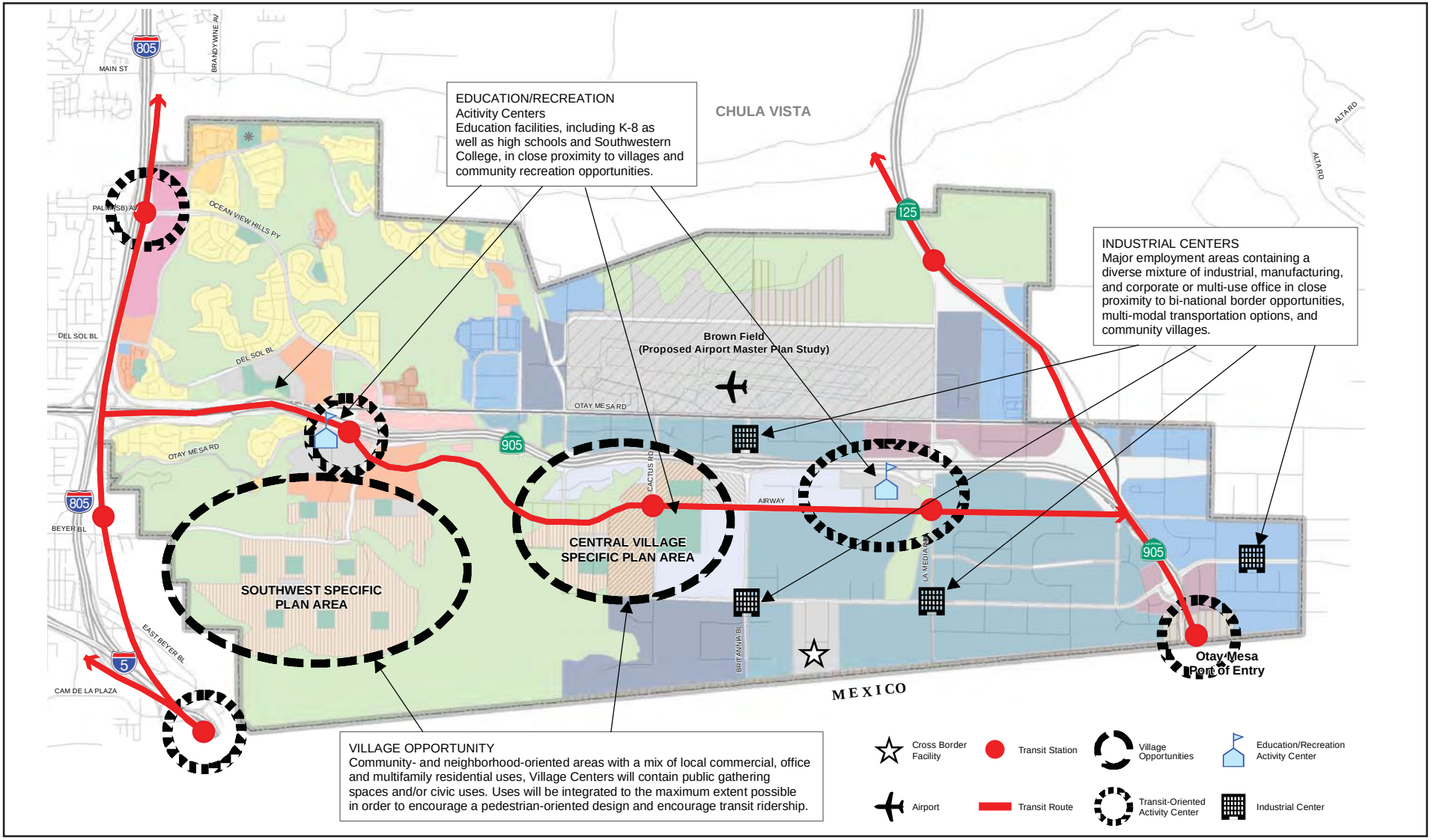


FIGURE 3-1

Otay Mesa Vision Plan

establishment of employment centers, along with village centers with mixed commercial and residential uses. Modified industrial land use designations are also included to facilitate the diversification of the industry profile in the CPU. Substantial infrastructure improvements and investment is required to facilitate change in these areas.

3.4.2 Community Plan Elements

A summary of the goals and contents of the CPU by element is provided below.

3.4.2.1 Land Use Element

The Land Use Element contains community-specific guidance for the future growth of the CPU area. The Land Use Element establishes goals and policies and contains detailed descriptions and distributions of land uses specific to the community, where the particular mix of uses is considered unique to the region. Proposed land use associated with the CPU is illustrated on Figure 3-2.

The current mix of industrial development, low-intensity residential uses, open space, and agriculture has evolved over several decades, as competing City values have resulted in the conversion of industrial land within the community. The Land Use Element provides: refined residential densities; two delineated Village Centers, around which housing and commercial services would be located, and specific policies for the development of new commercial, industrial, and institutional uses. The CPU addresses these complex issues through proposed land uses that respect the existing and evolving industrial character and border-related industries and support the economic viability of businesses. One of the focuses of the CPU is to minimize and address potential conflicts and compatibility issues associated with the collocation of residential and industrial uses, balancing economic viability of employers, and building upon successful developments.

Goals of the Land Use Element include the following:

- A distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services needed to serve Otay Mesa.
- Distinct villages that include places to live, work and recreate.
- A variety of housing types including workforce housing in close proximity to jobs.
- Diversified commercial uses that serve local, community and regional needs.
- Sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center.
- Adequate public facilities and institutional resources that serve the needs of the community.

- A land use pattern that is compatible with existing and planned airport operations.
- Border facilities that facilitate the safe and efficient movement of passengers and cargo.

Planning Districts

The CPU identifies five planning districts interconnected through activities and infrastructure that would help to organize and form the community of Otay Mesa (Figure 3-3). The planning districts include:

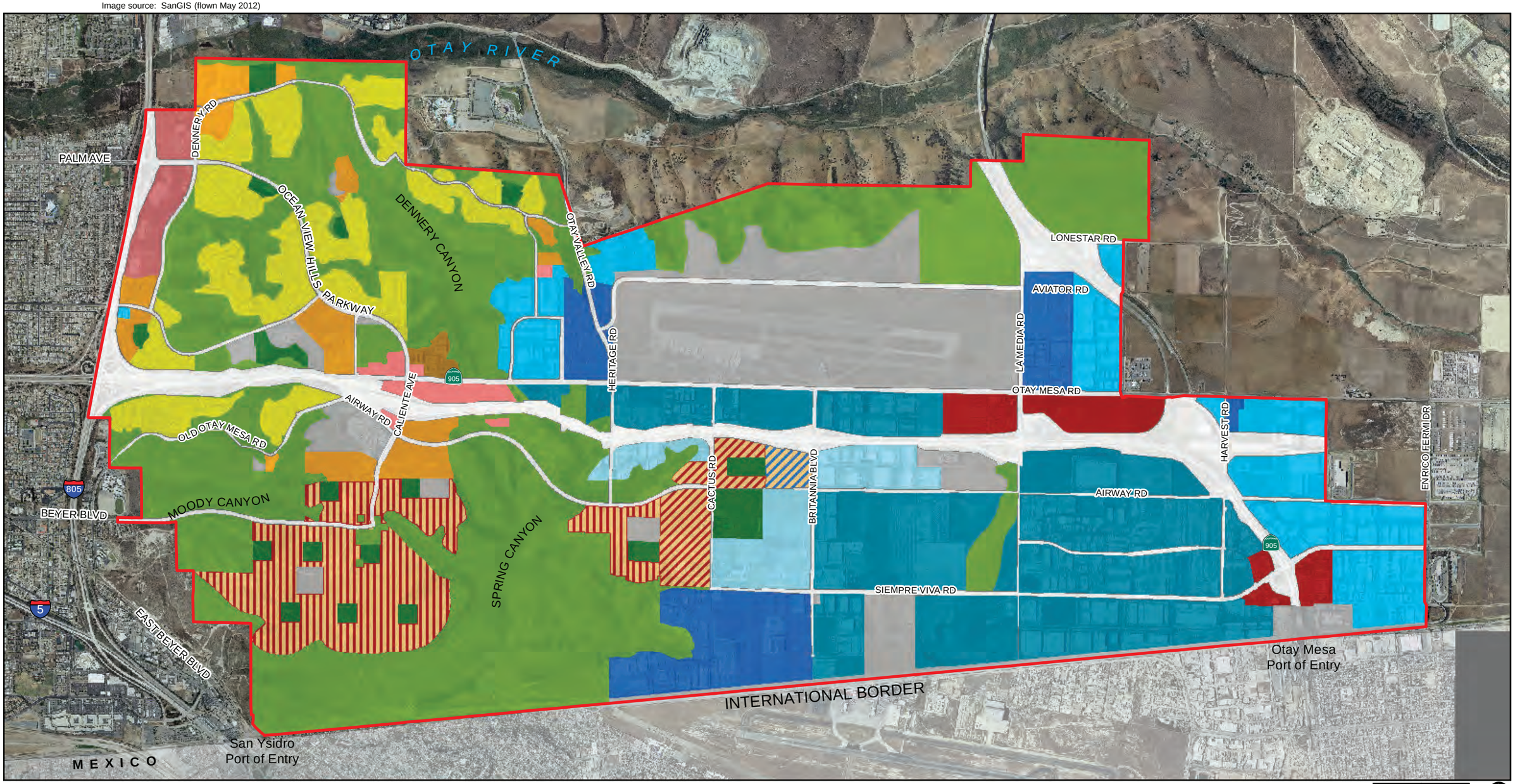
- Northwest District, generally composed of the existing development in the northwestern portion of Otay Mesa, and includes Precise Plan area neighborhoods: California Terraces, Dennery Ranch, Hidden Trails, Remington Hills, Riviera del Sol, Robinhood Ridge, and Santee Investments.
- Southwest District, located south of SR-905 and west of Spring Canyon and would be primarily residential with a supporting core mixed-use center. The mixed-use center would include civic, and neighborhood-serving commercial uses and services.
- Central District, located along the Airway Road corridor, would be comprised of three primary land uses: Central Village, Grand Park, and Education Complex.
- Airport District includes Brown Field and the surrounding industrial land in the northeastern CPU area.
- South District includes the POE, international business and trade uses, and industrial uses that are necessary for the movement of goods across the border.

3.4.2.2 Mobility Element

The CPU provides direction on how to achieve mobility and environmental goals through a balanced, multi-modal transportation network. The CPU refines the Mobility Element of the General Plan through community-specific pedestrian, bicycle, transit, street, goods movement, truck traffic, and regional collaboration recommendations and policies. Figures 3-4 through 3-6 illustrate the CPU planned transit routes, the existing and planned bicycle network, and the planned major roadways within the community. Unique mobility features addressed in the CPU include the POE, international goods movement, and Brown Field. Figure 3-7 shows the truck routes within the CPU area.

The Mobility Element builds upon the Land Use Element and Urban Design Element, which are designed to support walkability, transit-orientation, and sustainability goals consistent with SANDAG's Regional Comprehensive Plan (RCP), which calls for smart growth land use patterns. Goals of the Mobility Element include the following:

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Proposed Land Use Plan

Open Space, Parks, Institutional
- Open Space
- Parks
- Institutional

Village Centers
- Neighborhood Village
- Community Village

Residential
- Low
- Low Medium
- Medium
- Medium High

Commercial - Residential Prohibited
- Community Commercial
- Regional Commercial
- Heavy Commercial

Indistrial
- Business Park - Office Permitted
- Business and International Trade
- Light Industrial
- Heavy Industrial
- Business Park - Residential Permitted

Other
- Right-of-Way

0 Feet 2,500

FIGURE 3-2
Proposed CPU Land Use

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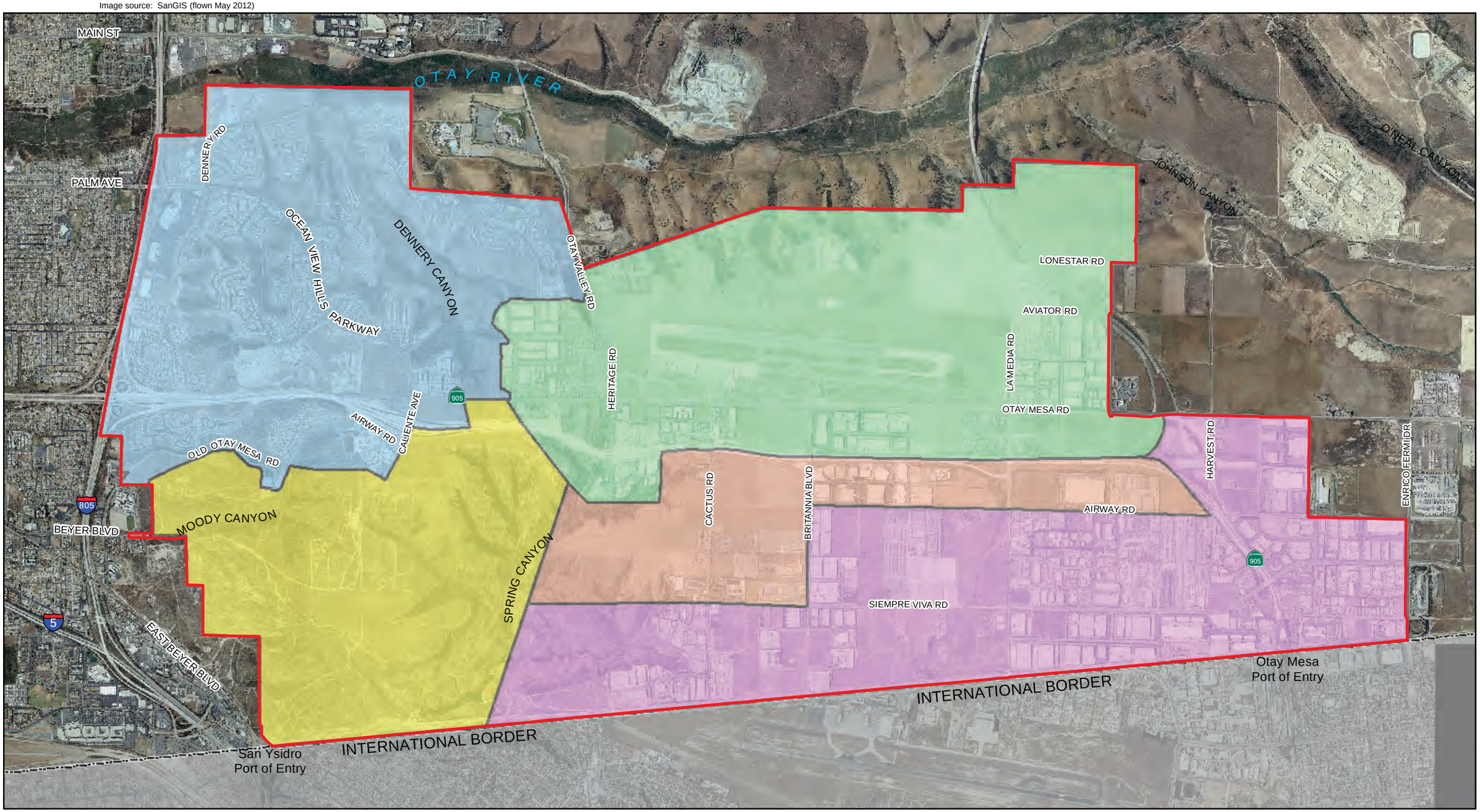
Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Planning Districts

- Airport
- Central
- Northwest
- South
- Southwest

0 Feet 2,500

FIGURE 3-3
Planning Districts

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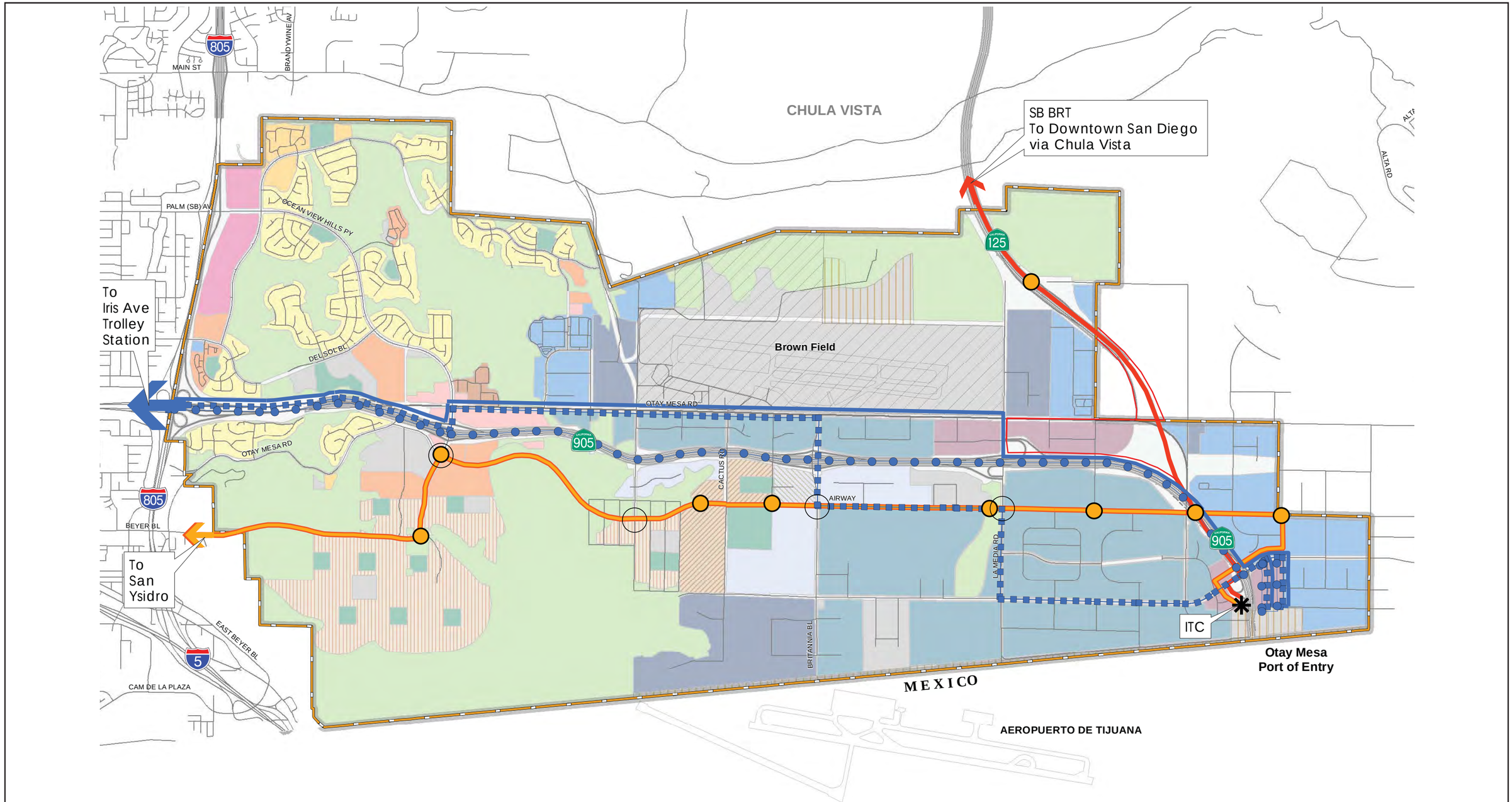
Map Source: City of San Diego



Community Plan Boundary
Potential BRT/Rapid Transit Stop
Potential Transit Priority Measure
Intermodal Transportation Center (ITC)

Existing Transit Routes
Route 905
Route 905A
Route 905

Future Transit Routes
South Bay Bus Rapid Transit (BRT)
SB BRT Interim Routing (Until SR-905/SR-125 Interchange is Completed)
Future Rapid Transit Route

0 Feet 2000

FIGURE 3-4
Transit Routes

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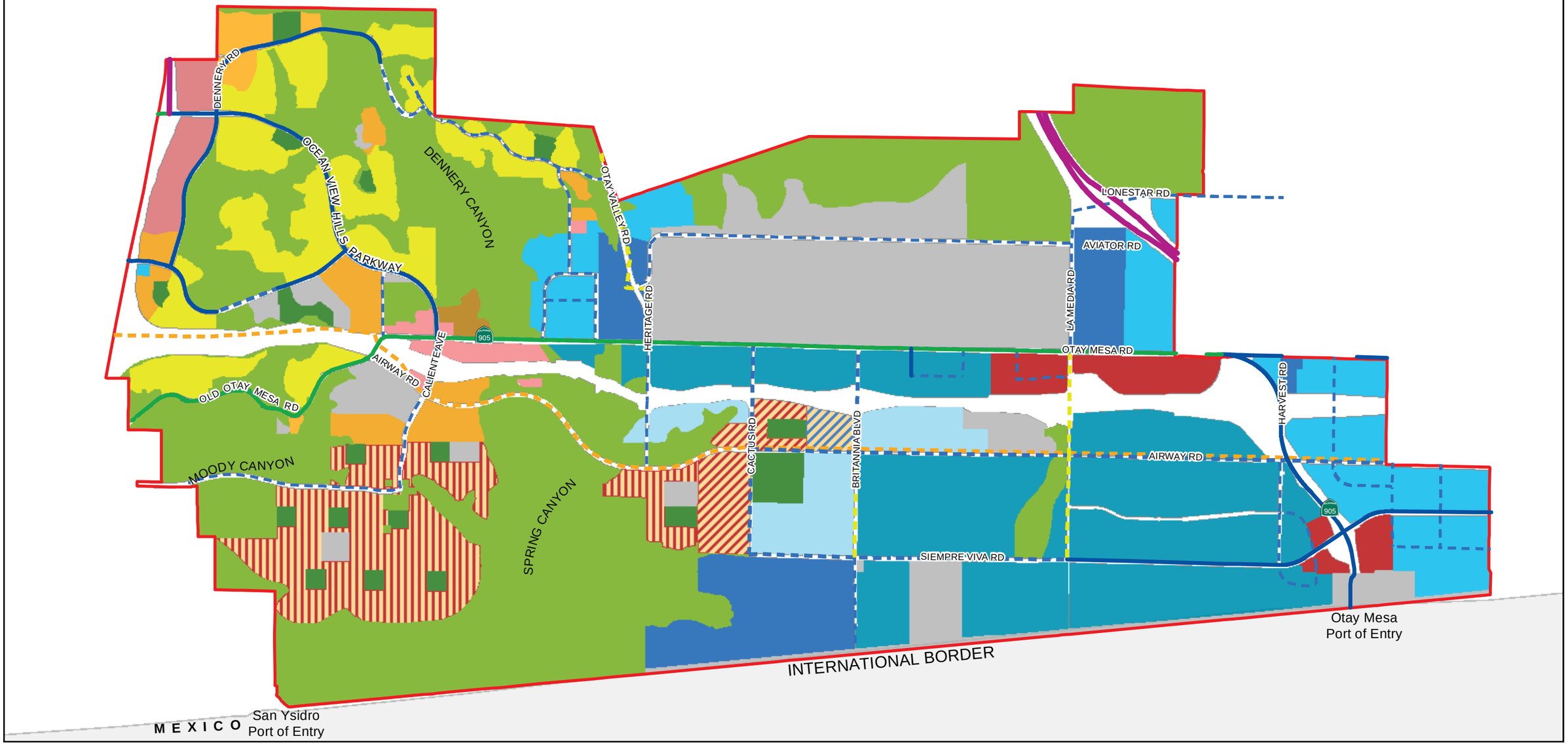

Otay Mesa Community Plan Boundary

Existing Bike Network
- Class II
- Class III
- Freeway Shoulder

Proposed Bike Network
- Class 1
- Class 2
- Class 3

Proposed Land Use Plan

Open Space, Parks, Institutional
- Open Space
- Parks
- Institutional

Village Centers
- Neighborhood Village
- Community Village

Residential
- Low
- Low Medium
- Medium
- Medium High

Commercial - Residential Prohibited
- Community Commercial
- Regional Commercial
- Heavy Commercial

Indistrial
- Business Park - Office Permitted
- Business and International Trade
- Light Industrial
- Heavy Industrial
- Business Park - Residential Permitted

Other
- Right-of-Way

0 Feet 2,500

FIGURE 3-5
Proposed Bicycle Routes

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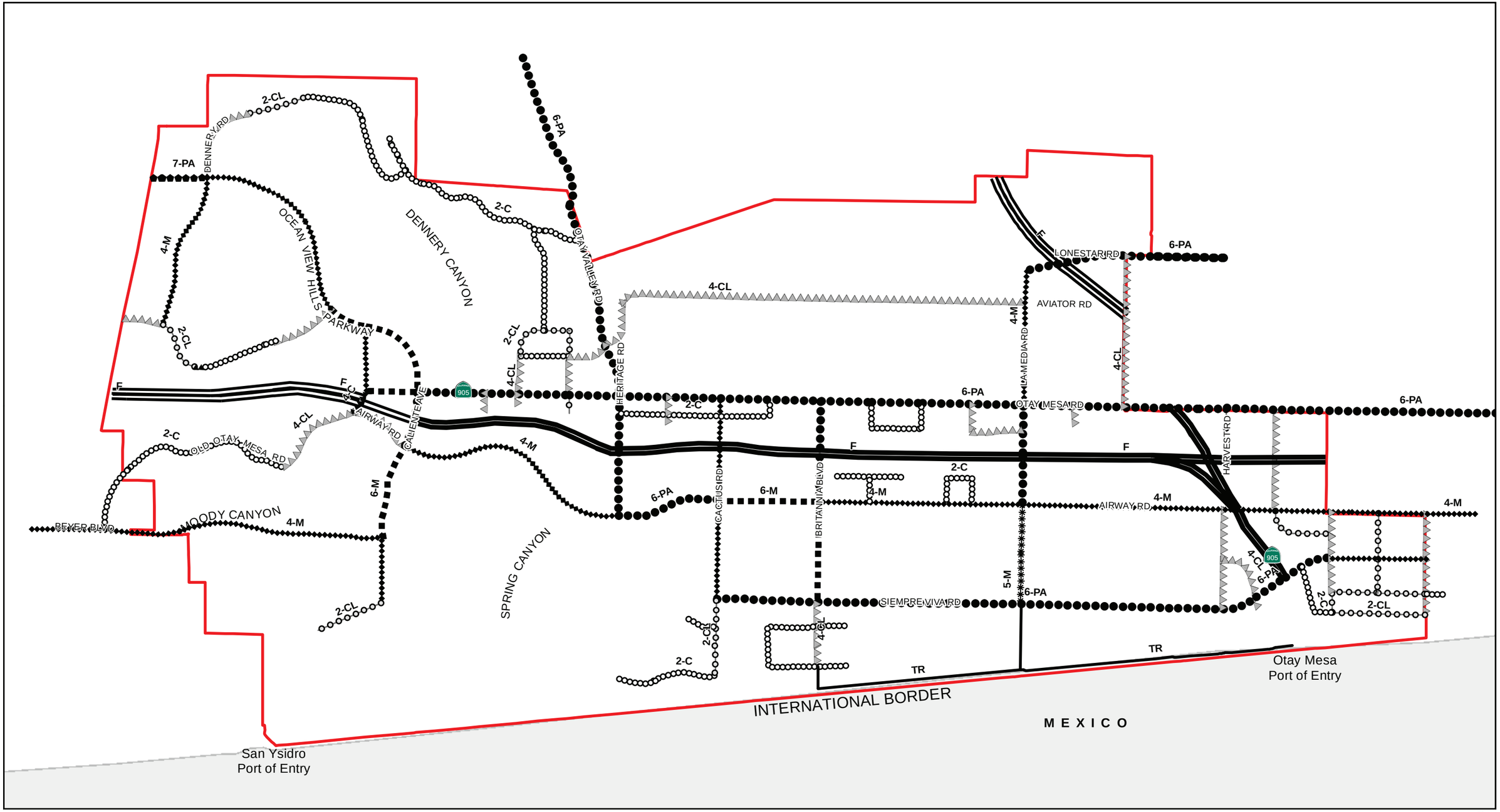

Otay Mesa Community Plan Boundary

Future Street Classification

- 2-Lane Collector
- 2-Lane Collector w/two way left turn
- 4-Lane Collector
- 4-Lane Collector w/two way left turn
- 4-Lane Major Arterial
- 5-Lane Major Arterial
- 6-Lane Major Arterial
- 6-Lane Primary Arterial
- 7-Lane Primary Arterial
- Freeway
- Truck Route

0 Feet 2,500

FIGURE 3-6
Major Roadways

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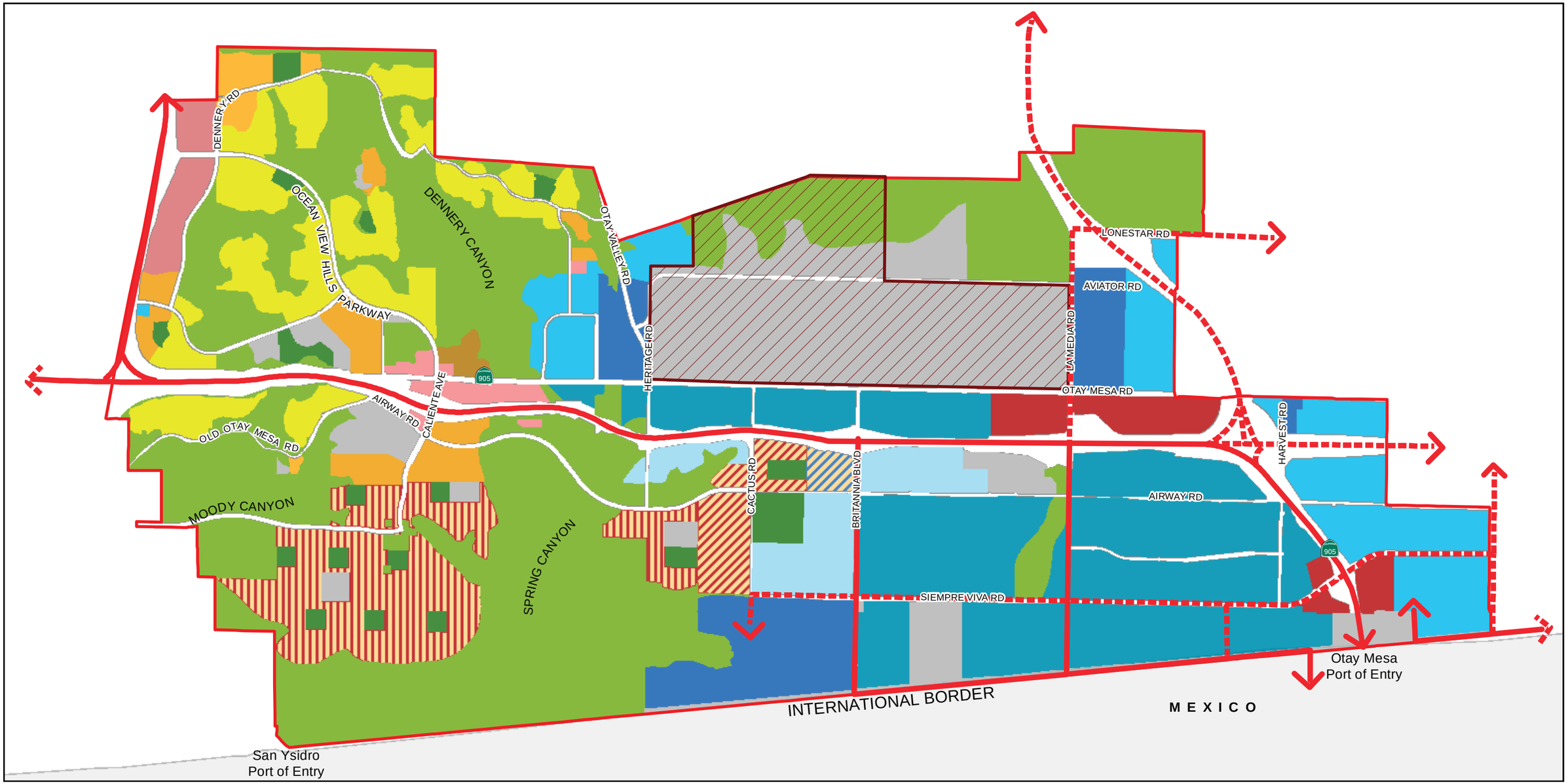

0 Feet 2,500

Otay Mesa Community Plan Boundary
Truck Route
Truck Activity Roads
Brown Field

Proposed Land Use Plan

Open Space, Parks, Institutional
- Open Space
- Parks
- Institutional

Village Centers
- Neighborhood Village
- Community Village

Residential
- Low
- Low Medium
- Medium
- Medium High

Commercial - Residential Prohibited
- Community Commercial
- Regional Commercial
- Heavy Commercial

Indistrial
- Business Park - Office Permitted
- Business and International Trade
- Light Industrial
- Heavy Industrial
- Business Park - Residential Permitted

Other
- Right-of-Way

FIGURE 3-7
Proposed Truck Routes

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- A pedestrian sidewalk and trails network that allows for safe and comfortable walking throughout the community.
- An effective transit network that provides fast and reliable service to local and regional destinations.
- A complete and interconnected street system that balances the needs of drivers, bicyclists, pedestrians, and others.
- A bicycle commuter network that links residents to transit, recreational, educational, and employment opportunities within the community.
- Transportation infrastructure and operations investments that facilitate goods movement and international travel, while fostering economic prosperity and a high quality of life within the community.
- Support for public health goals to increase the potential for walking and other forms of exercise to be incorporated into everyday life.

3.4.2.3 Urban Design Element

The intent of the Urban Design Element is to provide policy guidelines and visual illustrations for the future of the built environment. The Urban Design Element builds from the framework established in the Urban Design Element of the General Plan and echoes the General Plan's desire for respecting the community's natural setting, strengthening linkages and connectivity, improving the built environment, and creating mixed-use walkable villages. Goals of the Urban Design Element are as follows:

- An urban form that reflects the physical land as an amenity and provides an attractive built environment.
- Functional industrial corridors with a high quality design standard.
- A Southwest Village and Central Village that respect and showcase Spring Canyon.
- Active, safe, and pleasant streets, parks and public space.
- Clear, formalized routes that connect villages and major corridors to employment centers, core commercial areas, schools, parks, trails, and transit.
- An urban forest that distinguishes the Districts.
- A community infused with distinctive public art and cultural amenities.
- Attractive gateways at key entrances to the community's district's and villages.

Otay Mesa's built environment is planned around a unique system of existing open space canyons and preserves which provides a distinct natural boundary. Other existing features which contribute to the character of Otay Mesa and which also serve to

distinguish the five major districts include the Brown Field Airport, the Otay Mesa POE, the Southwestern College campus, the Northwest Neighborhoods, and the east/west SR-905 freeway. The intent of the Urban Design Element would be to provide visual illustrations for the future of the built environment and define the image each streetscape and district within Otay Mesa portrays for those who live, work, and visit there. Policies and recommendations pertaining to urban design are discussed in further detail in Section 5.2 of this PEIR, Visual Resources.

3.4.2.4 Economic Prosperity Element

Economic prosperity is at once local, regional, and international. Otay Mesa plays a vital role in the economic prosperity for the entire San Diego and U.S./Mexico border region due to activities generated at the Otay Mesa POE and additional base-sector industries. Otay Mesa base-sector industries including transportation logistics, warehousing, manufacturing and service firms contribute to the regional economy and San Diego's existing industry clusters. Otay Mesa provides the capacity for these and new industry clusters to expand. Simultaneously, the community continues to see an increase in residential development, bringing not only more residents, but the demand for greater access to commercial and retail businesses. Alongside a growing residential community, Otay Mesa's POE remains heavily used, with more than 740,000 truck crossings and 4 million passenger vehicle crossings in Fiscal Year 2011. This growth is expected to continue, as SANDAG projects Otay Mesa's employment base to increase over five-fold between 2000 and 2030 from 8,000 to 42,000 jobs. It is important to further attract diversified industries and supportive commercial uses to Otay Mesa to sustain growth in the regional and border economy, and provide access to quality jobs in southern San Diego.

The Economic Prosperity Element addresses the community's growing economic diversity by establishing policies and recommendations pertaining to the varied industrial and commercial land uses allowed under the new plan. Prime Industrial Lands are designated in the CPU, as illustrated in Figure 3-8. The Economic Prosperity Element is designed to allow industries enough flexibility to respond to global economic forces over the long term. Goals of the Economic Prosperity Element include:

- Sufficient land and infrastructure capacity for base sector industries to support the international border economy and the greater San Diego region.
- Flexibility for industrial, export-oriented businesses to respond quickly to international market competition and demand.
- Employment and economic growth through diversified industrial land uses.
- Integrated interregional and bi-national activities.
- Employment opportunities in Otay Mesa, southern San Diego County, and Mexico easily accessible to workforce housing.

Map Source: City of San Diego



0 Feet 3,000

Industrial Land Categories

- Prime Industrial Land - 1988.74 Acres
- Other Industrial Land - 389.54 Acres

Overlays

- U.S. Government Facility
- Brown Field Boundary
- Planning Area

FIGURE 3-8

Prime Industrial Lands

- Jobs that benefit middle-income workers.
- Commercial uses that support Otay Mesa's industrial community.
- Community educational resources to enhance workforce skills and abilities.

3.4.2.5 Public Facilities, Services, and Safety Element

This element addresses the public facilities and services needed to serve the existing population and new growth anticipated for Otay Mesa. It includes specific policies regarding public facilities financing, fire-rescue, police, wastewater, storm water infrastructure, water infrastructure, waste management, parks, libraries, schools, healthcare services and facilities, public utilities, and regional facilities. Goals of the Element include:

- Public facilities and services that are available and accessible to the community.
- Development that fully addresses impacts to public facilities and services.
- Application of financing mechanisms that secure infrastructure improvements as development occurs.
- Maintenance and improvement of police and fire safety services throughout the community.
- Safe and convenient park and recreation and school facilities.
- A reliable system of water, storm water, and sewer facilities to serve the existing and future needs of the community.
- Maintenance of high levels of emergency preparedness.
- Reduced exposure to hazardous materials.
- Innovative public infrastructure and facility financing mechanisms and strategies.

3.4.2.6 Recreation Element

The Recreation Element is intended to preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users. Accordingly, Otay Mesa's planned community's park and open space systems are intended to serve the residential, village, and employment areas of the community. The Recreation Element includes specific policies addressing park and recreation guidelines, preservation, accessibility, joint use and cooperative agreements, open space lands, and resource based parks. The goals of the Recreation Element are listed as follows:

- An efficient and comprehensive park system for Otay Mesa that serves the broad resident and workforce population.
- Village areas that are enhanced by frequent and well located public spaces and parks.
- A Grand Park that serves the residential, commercial, and industrial users of Otay Mesa.
- Open Space areas that balance the recreational needs of the community with habitat protection.

The goals and policies of the CPU, along with the General Plan policies, provide a comprehensive parks strategy in which the park system would be made up of population-based community, neighborhood, and joint-use parks. Consistent with the General Plan guidelines, community parks would be provided in the form of major parks or community parks; and neighborhood parks may be provided in the form of neighborhood parks, mini parks, pocket parks or plazas. The multiple neighborhood parks and joint-use areas would be located within the residential and village areas of Otay Mesa, with the Grand Park and Beyer Community Park sited to equitably serve the community.

3.4.2.7 Conservation Element

The Conservation Element builds on the General Plan Conservation Element with policies tailored to conditions in Otay Mesa. The Conservation Element addresses: habitat and sensitive lands protection; climate change and sustainable development; water and urban runoff management; the urban forest; community farms and gardens and air quality. The CPU addresses habitat protection through conformance with the City's ESL Regulations and Biology Guidelines, General Plan guidelines, the MSCP Subarea Plan, and the draft Vernal Pool HCP. As water supply is a critical issue, water conservation policies have been developed for this community and are included in this element. The CPU is also responsive to state legislation calling for greenhouse gas emissions reductions to be achieved in part through coordinated land use and transportation planning and more sustainable development practices.

The Conservation Element sets forth policies and recommendations for the urban forest and community gardens; all development in Otay Mesa would be required to plant and maintain street trees as identified in the Otay Mesa Community Street Tree Plan. Finally, the Conservation Element addresses air quality, which is of particular concern in the community because of the substantial amounts of truck traffic generated by industry and the POE. To address these challenges and opportunities, the Conservation Element sets forth the following goals:

- Preservation of a natural open space canyon network and associated biological resources.
- Vernal pool preservation and management.
- Assured water supply to meet future needs.
- Greenhouse gas reductions through implementation of the village land use plan, support for transit, incentives for clean technology industries, alternative energy generation, and sustainable development.
- Implementation of urban runoff management techniques.
- Development of a community-wide urban forest.
- Local food generation through community farms and gardens.
- Safe and healthy air quality.

3.4.2.8 Noise Element

Noise can affect the environment and well-being of people living, working, and visiting a community. Therefore, the General Plan Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The Noise Element of the CPU complements the General Plan goals and policies by addressing Otay Mesa specific noise sources and issues. Because Otay Mesa is an active suburban community with a mix of residential, commercial, and industrial uses, the Noise Element addresses noise sources of many types. These include aircraft noise from the Brown Field and Rodriguez International Airport activities; delivery activities in the commercial areas; and noise from vehicle and truck traffic on the nearby I-805, SR-11, SR-125, and SR-905 freeways. Noise Element goals include:

- Minimal exposure of residential and other noise-sensitive land uses to excessive aircraft noise.
- Minimal exposure of residential and other noise-sensitive land uses to commercial and industrial noise.
- Minimal exposure of residential and other noise-sensitive land uses to excessive truck and other motor vehicle traffic noise.

3.4.2.9 Historic Preservation Element

Designated historical resources within Otay Mesa, including the Auxiliary Naval Air Station Brown Field Historic District, reflect the area's aviation history and the early development of the area as an agricultural community. The CPU Historic Preservation Element builds upon the General Plan's Historic Preservation Element by including specific policies addressing the community's unique historical and cultural resources.

Specifically, the CPU provides for the identification, retention, and interpretation of the area's historical resources, including historic districts, buildings, structures and objects; archaeological and Native American sites; and cultural landscapes. The element addresses treatment of historical resources according to established standards and guidelines. Goals of the Historic Preservation Element include:

- Identify and preserve significant historical resources in Otay Mesa.
- Promote educational opportunities and incentives related to historical resources in Otay Mesa.

These goals and the policies found within the CPU Historic Preservation Element, along with related General Plan policies, provide a comprehensive historic preservation strategy for Otay Mesa.

3.4.3 CPU Land Use Designations

The CPU encompasses a broad range of the land use designations defined in the General Plan and contains a more detailed description and distribution of land uses than the citywide General Plan. Land uses include residential with a variety of density ranges, village centers, commercial, industrial, open space, parks, and institutional. Table 3-1 is based on the Land Use Table within the General Plan, and outlines the proposed land use categories within the CPU area, as well as the types of uses allowed in each category.

TABLE 3-1
COMMUNITY PLAN LAND USE DESIGNATIONS

General Plan Land Use	Community Plan Designation	Use Considerations	Description	Density Range (du/ac)
Park, Open Space, and Recreation	Open Space	None	Provides for the preservation of land that has distinctive scenic, natural or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. Applies to land or water areas that are undeveloped, generally free from development, or developed with very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use. Open Space would have utility for: primarily passive park and recreation use; conservation of land, water, or other natural resources; historic or scenic purposes; visual relief; or landform preservation.	N/A
	Population-based Parks	None	Provides for areas designated for passive and/or active recreational uses, such as community parks and neighborhood parks. It would allow for facilities and services to meet the recreational needs of the community as defined by the community plan.	N/A
	Resource-based Parks	None	Provides for recreational parks to be located at, or centered on, notable natural or man-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and would be intended to serve the citywide population as well as visitors.	N/A
Residential	Residential - Very Low	None	Provides for single-family housing within the lowest-density range.	0–4 du/ac
	Residential - Low	None	Provides for both single-family and multifamily housing within a low-density range.	5–9 du/ac
	Residential - Low Medium	None	Provides for both single-family and multifamily housing within a low-medium-density range.	10–14 du/ac
	Residential - Medium	None	Provides for both single-family and multifamily housing within a medium-density range.	15–29 du/ac
	Residential - Medium High	None	Provides for multifamily housing within a medium-high-density range.	30–44 du/ac

TABLE 3-1
COMMUNITY PLAN LAND USE DESIGNATIONS
(continued)

General Plan Land Use	Community Plan Designation	Use Considerations	Description	Density Range (du/ac)
Commercial	Community Commercial	Residential Prohibited	Provides for shopping areas with retail, service, civic, and office uses for the community at large within three to six miles.	CC-2-3 with 0.3 FAR
	Regional Commercial	Residential Prohibited	Serves the region, within five to 25-plus miles, with a wide variety of uses, including commercial service, civic, retail, office, and limited industrial uses.	CC-1-3 with 0.3 FAR
	Heavy Commercial	Residential Prohibited	Provides for retail sales, commercial services, office uses, and heavier commercial uses such as wholesale, distribution, storage, and vehicular sales and service. This designation would be appropriate for transportation corridors where the previous community plan allowed for both industrial and commercial uses.	IL-3-1with 0.5 FAR
Institutional, Public and Semi-Public Facilities	Institutional	None	Provides a designation for uses that would be identified as public or semi-public facilities in the community plan and which offer public and semi-public services to the community. Uses would include but are not limited to: military facilities, community colleges, communication and utilities, transit centers, schools, libraries, police and fire facilities, post offices, hospitals, park-and-ride lots, government offices and civic centers.	N/A
Multiple Use	Neighborhood Village	Residential Required	Provides housing in a mixed-use setting and convenience shopping, civic uses as an important component, and services serving an approximate three mile radius.	15–25 du/ac
	Community Village	Residential Required	Provides housing in a mixed-use setting and serves the commercial needs of the community-at-large, including the industrial and business areas. Integration of commercial and residential use would be emphasized; civic uses would be an important component. Retail, professional / administrative offices, commercial recreation facilities, services businesses, and similar types of uses allowed.	30–35 du/ac

TABLE 3-1
COMMUNITY PLAN LAND USE DESIGNATIONS
(continued)

General Plan Land Use	Community Plan Designation	Use Considerations	Description	Density Range (du/ac)
Industrial Employment	Light Industrial	Office Use Limited	Allows a wider variety of industrial uses by permitting a full range of light manufacturing and research and development uses, and adding other industrial uses such as storage and distribution and transportation terminals. Multi-tenant industrial uses and corporate headquarters office uses would be permitted. Otherwise, only limited office or commercial uses would be permitted which would be accessory to the primary industrial use. Heavy industrial uses that have significant nuisance or hazardous effects would be excluded.	IL-2-1 with 0.5 FAR
	Business Park	Office Use Permitted	Allows office, research and development, and light manufacturing uses. This designation would not permit storage and distribution uses except as accessory to the primary use. It is appropriate to apply in portions of communities primarily characterized by single- and multi-tenant office development with some light industrial uses.	IP-1-1 with 0.5 FAR
	International Business and Trade	Office Use Permitted	Combines the uses permitted in both the Business Park and Light Industrial designations. Would allow single- and multi-tenant office, research and development, light manufacturing, and storage and distribution uses. Would be appropriate to apply in portions of communities adjacent to the border, other ports of entry, or areas in transition to higher intensity industries.	IBT-1-1

TABLE 3-1
COMMUNITY PLAN LAND USE DESIGNATIONS
(continued)

General Plan Land Use	Community Plan Designation	Use Considerations	Description	Density Range (du/ac)
Industrial Employment (cont.)	Heavy Industrial	Office Use Limited	Provides for industrial uses emphasizing base sector manufacturing, wholesale and distribution, and primary processing uses that would have nuisance or hazardous characteristics. For reasons of health, safety, environmental effects, or welfare these uses would be segregated from other uses. Non-industrial uses, except corporate headquarters, would be prohibited.	IH-1-1 with 0.5 FAR
	Business Park-Residential Permitted	Office Use Permitted	Would apply in areas where employment and residential uses would be located on the same premises or in close proximity. Permitted employment uses include those listed in the Business Park designation. Multi-family residential uses would be optional with the density to be specified in the community plan.	15–44 du/ac;[1] IP-3-1 ~~with 0.5 FAR~~

[1]The Brown Field Technology Park property has previously approved entitlements and permits that allow an FAR of 20.

Figure 3-2 illustrates the planned land uses for the CPU area. The planned land use distribution by acreage is summarized below in Table 3-2.

TABLE 3-2
PLANNED LAND USE

Land Use	Acres[1]	% of Total Acres	Dwelling Units
Open Space	2,833	30%	
Residential	802	9%	7,648
Commercial	302	3%	
Village Area	560	6%	11,126
Residential	530		
Mixed Use	30		
Industrial	2,510	27%	
Institutional	1,120	12%	
Parks	151	2%	
Right-of-Way	1,023	11%	
TOTAL	9,302	100%	18,774

[1]Rounded to the nearest whole number.

3.4.3.1 Specific Plan Areas

To implement the General Plan's City of Villages Strategy, village areas are planned in the Southwest and Central Districts. These Districts are primarily residential in nature and have core areas of mixed uses and public spaces. Villages are intended to be compact, pedestrian-friendly and transit-oriented and include a variety of residential, commercial and civic uses. In order to comprehensively plan the Southwest and Central Village areas, one specific plan for each area would be required prior to consideration of any comprehensive development and rezoning proposals. CPU policies and recommendations for Specific Plans include:

- Require Specific Plans and any rezoning required consistent with the policies of this plan for the Southwest and Central Village Areas.
- Achieve comprehensive neighborhood and community village development through Specific Plans that:
  a. Respect the natural topography and sensitive habitat areas with growth patterns that balance development with preservation of natural resources.
  b. Provide a land use map that illustrates the detailed land use designations, including any lands set aside for resource conservation, consistent with the MSCP Subarea Plan and any future ~~any~~ Vernal Pool Habitat Conservation Plan. The specific plan land use map would refine the Otay Mesa Community Plan Land Use Map as part of the specific plan approval process.

c. Illustrate the complete circulation system that, where possible, follows a grid pattern, and indicate how the system would relate to the overall Otay Mesa circulation system.

d. Strive for block sizes along local and collector streets to have a maximum perimeter of 1,800 feet.

e. Illustrate a separate system of pedestrian and bicycle facilities and pathways linking the activity centers with the residential areas, public facilities, and open space systems.

f. Distribute parks comprehensively throughout the village area. Refer to Policy 7.1-7 of the Recreation Element for further recommendations.

    1. Link parks to one another with pathways to increase connectivity and enhance sense of community.

    2. Locate neighborhood parks at the end of streets and adjacent to canyons, when appropriate, to accommodate and enhance public views and vistas.

g. Identify specific locations for schools, parks, and pedestrian pathways.

    1. Site schools and parks adjacent to each other to create activity centers within neighborhoods.

    2. Provide pathways and trails that connect public facilities with each other and to residential areas.

    3. Provide pathways and connections, such as interpretive centers and trailheads, from facilities to canyon edges to take advantage of educational and recreational opportunities.

h. Incorporate a diversity of housing types that includes market rate and affordable housing. Encourage inclusionary housing on-site.

i. Include an appropriate balance of single-family and multi-family housing consistent with the projections provided in this plan.

j. Provide development at densities that support transit as an integral component of village areas and corridors.

k. Require a mixed-use residential/commercial component to be included within village core areas, with neighborhood-serving commercial uses such as food markets, restaurants, and other small retail shops. Encourage an anchor grocery store within each village area.

l. Identify centrally located mixed-use core areas within each village area adjacent to key roadways and transit stops. Require a minimum of 15 dwelling units/acre (du/ac) for core areas designated Neighborhood Village and 30 du/ac for core areas designated Community Village.

m. Locate higher density mixed residential uses within a ½ mile of a "Town Center" along Beyer Road and within a ½ mile from the community commercial center in the north portion of the Southwest Village.

n. Locate higher density mixed residential uses within a ¼ mile of transit stops along Airway Road and near the mixed-use retail uses in the Central Village as shown on Mobility Element Figure 3-2.

o. Include a detailed design plan for the mixed use village core areas that identifies retail, convenience uses, and public spaces.

p. Provide sufficient community serving commercial development within village core areas and along transit corridors that support the residents, workforce, and visitors as these areas develop.

q. Provide refined architecture, urban design, and streetscape guidelines consistent with the policies in the Otay Mesa Community Plan and the General Plan.

r. Include guidelines and illustrations for height, bulk, and scale of buildings and their relation to each other.

s. Provide a street tree plan that utilizes species within the Otay Mesa Street Tree Plan.

t. Require a phasing plan to ensure timely provision of necessary public facilities to serve the proposed development.

Village Areas are designated either Neighborhood Village or Community Village:

- The **Neighborhood Village** designation requires residential uses to be provided in a mixed-use setting with convenience shopping, civic uses, and services, serving an approximate three-mile radius. Residential would be permitted at 15-25 du/ac. The Neighborhood Village designation would be proposed throughout most of the Southwest Specific Plan area and within the western portion of the Central Village Specific Plan area.
- The **Community Village** designation provides housing in a mixed-use setting and serves the commercial needs of the community-at-large within a high-density range of 30–35 du/ac. This designation occurs in the eastern portion of the Central Village Specific Plan area and to the northwest and northeast of the intersection of Airway and Cactus roads.

3.4.3.2 Residential

a. Housing Policies

The CPU provides for a variety of housing types including market rate, workforce, and affordable housing. The land use designations in the CPU are intended to provide a

diversity of housing options and implement the City of Villages strategy. Policies and recommendations pertaining to housing include:

- Respect existing density ranges in previously approved Precise Plan areas of the Northwest District.
    a. Include existing density ranges of precise plans to allow any undeveloped neighborhood areas to develop in accordance with precise plan designations.
    b. Implement design guidelines of precise plans that are consistent with the goals and policies of the City's General Plan.
    c. Transition new development with greater intensity from existing development through the use of landscaping, fencing, setbacks, off-setting planes, and other urban design techniques.
    d. Develop remaining undeveloped neighborhoods with a variety of housing types, and target the upper limits of the density ranges.
- Integrate a variety of housing types within village and residentially designated areas with multi-modal access from the villages to the employment centers in the eastern portion of Otay Mesa.
- Include in all residential developments housing units that are sized to meet the household family sizes anticipated in Otay Mesa.
- Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.

b. Affordable Housing Policies

In accordance with the Housing Element, the CPU also provides policies to address affordable housing, including:

- Develop housing at different density ranges to provide housing affordable to all income levels.
- Promote affordable housing development through the provision of a variety of housing types, including flats, townhomes, smaller-lot single-family homes, and other types of housing that are affordable in nature.
- Promote the production of very-low and low income affordable housing in all residential and village designations.
- Support development of on-site inclusionary housing within all specific plan proposals.
- Encourage on-site inclusionary housing within all residential development proposals.

- Create affordable home ownership opportunities for moderate income buyers.
    a. Encourage development of moderately priced, market rate housing affordable to middle income households.
    b. Promote homebuyer assistance programs for moderate income households.

c. Residential Land Use Designations

Five varying residential land use designations, in addition to Village categories, are applied within the CPU area. The residential land use designations are described below.

- The **Residential – Very Low** designation provides for single-family housing within the lowest-density range of 0–4 du/ac. This designation occurs along the CPU area's western border.
- The **Residential – Low** designation provides for both single-family and multi-family housing within a low-density range of 5–9 du/ac. Other than Open Space, this designation is the primary proposed land use in the Northwest District.
- The **Residential – Low to Medium** designation provides for both single-family and multi-family housing within a low-medium density range at 10-14 du/ac. This designation occurs in very northwest corner of the CPU area, adjacent to similar land uses in the adjacent community of Otay-Nestor.
- The **Residential – Medium** designation provides for both single-family and multi-family housing within a medium-density range at 15-29 du/ac. This designation occurs in a small area adjacent to I-805 freeway.
- The **Residential – Medium to High** designation provides for multi-family housing within a medium-high-density range of 30**–**44 du/ac. This designation occurs just north of SR-905 in the Northwest District, adjacent to institutional and community commercial land uses.

Buildout of the residential (including Village) land uses in the CPU would generate approximately 18,774 housing units (Table 3-3).

TABLE 3-3
CPU RESIDENTIAL DENSITY RANGES/
ESTIMATED SINGLE-FAMILY AND MULTI-FAMILY DWELLING UNITS

Designation	Density Range (du/acre)	Single-family Units	Multi-family Units
Residential – Very Low	0-4	59	0
Residential – Low	5-9	2,814	0
Residential –- Low to Medium	10-14	0	860
Residential – Medium	15-29	0	1,321
Residential – Medium to High	30-44	0	2,594
Neighborhood Village (Residential Required)	15-25	1,400	4,480
Community Village	30-35	0	4,960
Business Park, Residential Permitted	15-44	0	286
TOTAL		4,273	14,501

The CPU would increase the number of multi-family and affordable housing units above what is envisioned in the adopted Community Plan, and provide a more cohesive community by designating village areas that include residential uses in locations in proximity to services, public facilities, and public transportation.

The CPU addresses three specific needs. First, there is a need for larger living units to accommodate typically larger households. Second, the current community is in need of affordable housing opportunities, based on generally lower household income and larger household size. Finally, the community would benefit from residential development within close proximity to future job opportunities in Otay Mesa that would be comparable with the citywide median for.

3.4.3.3 Commercial Employment, Retail, and Services

Commercial land uses within the CPU account for 5 percent of overall land area. A majority of these lands are located in proximity to the SR-125, SR-905, and the POE to meet the demand of border-related activity. Existing commercial lands, serving both regional and community functions, are primarily located within the Northwest District. Commercial land uses range from neighborhood-serving commercial uses within the Northwest District to heavy commercial uses closer to the border.

Market analysis shows there is sufficient commercial acreage within Otay Mesa to service the community through buildout; however, with the CPU, additional neighborhood and community serving commercial is anticipated within the village areas. The CPU identifies land for various types of commercial uses, including Community Commercial, Regional Commercial, and Heavy Commercial, as described below. Policies and recommendations relating to each of the commercial land use categories are found within the CPU.

- The **Community Commercial** designation provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Residential uses are prohibited under this designation. The CPU calls for the maintenance of Community Commercial areas in Otay Mesa to support the development of retail, office and other commercial services to serve surrounding areas.
- The **Regional Commercial** designation serves the region within 5 to 25 miles, with a wide variety of uses, including commercial service, civic, retail, office and limited industrial uses. The CPU calls for the maintenance and enhancement of regional commercial uses for use by Otay Mesa and surrounding areas.
- **Heavy Commercial** designation provides for retail sales, commercial services, office uses, and industrial uses such as wholesale, distribution, storage, and vehicular sales and service that cater to the maritime industries. Residential uses would be prohibited under this designation. The CPU states that Heavy Commercial, a mixture of industrial and commercial uses, would be allowed near the POE and along Otay Mesa Road, where existing development would be a mix of industrial and commercial uses.

3.4.3.4 Industrial

Industrial land uses in Otay Mesa help drive the economic prosperity of San Diego by importing wealth to the regional economy through the production of goods and the development of intellectual products and processes which are exported to national and international markets. These base-sector industries are crucial to the growth and sustainability of the regional economy. The use of a variety of industrial land use designations (Heavy, Light, International Business and Trade, Business Park – with and without Residential) in Otay Mesa would protect and enhance the existing industrial uses, while providing an opportunity to increase the industrial capacity. The CPU establishes polices and recommendations for each type of industrial designation. (Further discussion of industrial land uses is also found in the Economic Prosperity Element, Chapter 5 of the CPU.) The CPU's identification of lands as prime industrial is intended to protect these valuable employment lands and prevent future encroachment of uses that do not conform to the purpose of prime industrial. In general, Otay Mesa's prime industrial land consists of lands designated for industrial and base-sector uses.

The Economic Prosperity Element of the General Plan addresses the relationship between industrial lands and the economic health of the City. As stated in the General Plan, the policies "are intended to strengthen our industries, retain and create good jobs, with self-sufficient wages, increase income, and stimulate economic investment in our communities." The element also addresses prime industrial lands that support export-oriented base sector activities such as warehouse distribution, heavy or light manufacturing, and research and development uses.

a. Heavy Industrial

The **Heavy Industrial** designation provides for industrial uses emphasizing base sector manufacturing, wholesale and distribution, and primary processing uses that would have nuisance or hazardous characteristics. This designation would promote efficient industrial land use with minimal development standards, while providing proper safeguards for adjoining properties and the community in general. This designation would limit the presence of non-industrial uses in order to preserve land that would be appropriate for large-scale industrial users. Policies pertinent to heavy industrial uses include:

- Maintain lands designated as Heavy Industrial where uses with nuisance or hazardous characteristics can locate safe from encroachment by sensitive receptors.
- Provide adequate land use buffers and/or distance separation from residential uses for heavy industrial proposals with hazardous or toxic substances.
    a. Consider office, commercial, retail and parking uses as acceptable buffer uses within the village-freeway interface area.
    b. Locate schools, parks and libraries outside of interface areas. (see Section 5.3 Air Quality for details about facilities and buffer distances).
    c. Determine distance separation on a case by case basis based on an approved study submitted by an applicant, or if no study is prepared, provide a 1000-foot minimum distance separation.
    d. Apply the buffer to sensitive receptors located along the Mexican Border.
- Reduce or mitigate the environmental and negative impacts of Heavy Industrial uses on surrounding areas, such as noise, visual, and air quality impacts. Consider design elements that include, but are not limited to, landscape, site orientation, fencing, and screening.

b. Light Industrial

The **Light Industrial** designation allows a wider variety of industrial uses by permitting a full range of light manufacturing, research and development, and adding other industrial uses such as storage and distribution. Multi-tenant industrial uses and corporate headquarters offices are permitted. CPU policy addressing light industrial uses includes:

- Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.

c. International Business and Trade

The **International Business and Trade (IBT)** designation combines the uses permitted in both Business Park and Light Industrial designations. The designation allows single- and multi-tenant office, research and development, light manufacturing, and storage and distribution uses. The IBT would be applied in portions of community adjacent to the border, POE, or areas in transition to higher intensity industries. CPU policies pertaining to International Business and Trade land uses include:

- Provide the International Business and Trade land use designation to support a wide range of industrial land uses which can intensify over time.

d. Business Park/Business Park-Residential Permitted

The **Business Park** designation allows office, research and development, and light manufacturing uses. This designation would not permit storage and distribution uses, except as accessory to the primary use. CPU policies pertaining to Business Park land uses include:

- Allow for a wide range of businesses that do not negatively impact sensitive receptors to locate in the Business Park areas adjacent to parks and village areas.
- Provide adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to public parks and village areas.
- Develop synergy with the adjacent village and public facility uses to maximize non-vehicular trips.
- Allow office, research and development, and optional residential uses <u>with industrial proposals</u> in the Business Park-Residential Permitted area.
    a. Allow optional residential uses with <u>industrial</u> proposals that conform to APCD and HAZMAT adjacency guidelines and regulations.
    b. Implement proposals with optional residential uses with Business Park Residential Permitted CPIOZ, where the residential use does not exceed 49 percent of the contiguous area with the Business Park, Residential Permitted, and the density range for the multi-family residential uses is 15-44 dwelling units per acre.
- Provide adequate buffers, such as land uses, landscape, walls, and distance between the residential component of the Business Park – Residential Permitted lands, and Britannia Boulevard and SR-905 to minimize negative impacts of air quality, noise, and truck transportation on residents.

3.4.3.5 Community Plan Implementation Overlay Zone

Two Community Plan Implementation Overlay Zones would apply in the CPU area.

The Otay Mesa Community Plan Implementation Overlay Zone (OM CPIOZ) would include all industrial and commercial properties within Otay Mesa except for the approximately 26-acre site designated as Business Park Residential Permitted. The OM CPIOZ is required to ensure protection of sensitive resources, construction of the circulation infrastructure, and conformance with the appropriate policies from the Urban Design Element.

The Business Park, Residential Permitted Community Plan Implementation Overlay Zone (BPRP CPIOZ) would include the approximately 26-acre site designated Business Park, Residential Permitted just west of Britannia Boulevard and north of Airway Road. The BPRP CPIOZ is required to ensure that residential development does not exceed 49% of the total site.

See Section 3.5 for the specific community plan implementation overlay zone language.

3.4.3.6 Institutional

The Institutional land use designation provides for uses that are identified as public or semi-public facilities which offer public or semi-public services. Uses may include, but are not limited to, military facilities, community colleges, communication and utilities, transit centers, schools, libraries, and police and fire stations. Institutional land uses include Brown Field, fire stations, police station, schools, libraries, the Cross Border Facility, and Southwestern Community College. Institutional policies and recommendations contained in the CPU include the following:

- Provide public services consistent with General Plan Standards.
- Provide schools consistent with the San Ysidro and Sweetwater Union High School Districts standards.
    a. Work cooperatively with districts to provide schools within close proximity to housing development.
    b. Work cooperatively with districts to provide innovative educational opportunities and services, such as K-8 schools and multi-level schools to reduce site acquisition costs and development footprint.
    c. Collaborate with San Ysidro School District on the locations for two to three additional K-8 schools and one to three additional K-6 schools within the Southwest and Central village areas based on the projected housing units and population.
    d. Collaborate with the Sweetwater Union High School District to provide one additional high school for the future residential development and population projections.

- Allow a Cross Border Facility and its ancillary uses in the general area south of Siempre Viva Road and east of Britannia Boulevard directly across from the Rodriguez International Airport.

3.4.3.7 Parks, Open Space, and Recreation

Otay Mesa's topography of mesa tops and extensive canyon systems has created a unique opportunity for the City to designate open space. Lands adjacent to open space networks within Otay Mesa offer potential recreation opportunities, visual relief to the development on the mesa tops, serve as wildlife and biological preserves, and offer educational and interpretive opportunities. Park and open space designations in the CPU include:

- The **Open Space** land use designation provides for open space that would have utility for the following: primarily passive park; conservation of land, water, or other natural resources; historic or scenic purposes; visual relief; or landform preservation.
- The **Park** land use designation provides for areas designated for passive and/or active recreational uses, such as community parks and neighborhood parks.

Open space policies and recommendations contained in the CPU include the following:

- Maintain the existing Open Space, and collaborate with the wildlife agencies, environmental groups and the public to ensure adequate conservation for sensitive biological resources and consistency with the City's MSCP Subarea Plan.
- Create a close relationship between the natural environment of the Otay River Valley, Spring Canyon, and the Dennery Canyon systems and developed areas through the provision of multi-use trails and educational elements.
- Maintain existing parks within the Northwest District, and develop remaining parks in the Riviera Del Sol and Hidden Trials neighborhoods.
- Identify and provide population-based parks per the General Plan standards at locations that are accessible and centrally located to most users within the Southwest and Central Villages. Create pedestrian pathways that connect parks with activity centers.

3.4.3.8 Airports and Airport Land Use

Planned land uses within Otay Mesa are influenced by the presence of two airports: Brown Field and General Abelardo L. Rodriguez International Airport. Brown Field is a busy general aviation airport and is located in the center of Otay Mesa. General aviation encompasses all aviation except air carrier and military. General Abelardo L. Rodriguez International Airport, with direct international flights, lies directly to the south of the CPU area. The Cross Border Facility, which is discussed further in the Mobility and Urban

Design Elements, has recently been approved by the City. The Cross Border Facility is located in the CPU area adjacent to the U.S.-Mexico border on a 63.8-acre property. The project includes the construction of a Cross Border Facility, parking, and industrial office/warehouse uses. The goals of the project include providing a more convenient and secure border crossing to access the General Abelardo L. Rodriguez International Airport, facilitating cross border movement of ticketed air travelers, maintaining security of the border, and developing uses that would serve airline passengers.

Policies and recommendations pertaining to airports and airport land use compatibility include:

- Collaborate with the airport operator (Caltrans) and the Federal Aviation Administration in the modernization and development of Brown Field.
- Review projects within the Airport Influence Area for consistency with the adopted ALUCP.

3.4.3.9 Border Facilities

Otay Mesa is home to the international border crossing known as the Otay Mesa Land POE, which is vitally important to international trade and the regional economy. The POE is a multi-modal (commercial, non-commercial, and pedestrian) POE. Policies and recommendations pertaining to the POE include:

- Collaborate with federal, state, and local agencies to minimize impacts to Otay Mesa properties and infrastructure from any expansion of the existing facility.
- Work cooperatively with outside agencies to minimize land use and infrastructure impacts to Otay Mesa from any new port of entry and its corresponding freeway/roadway network.

3.4.4 Mobility Element Roadways

The CPU contains numerous new roadways, along with classification changes to existing Mobility Element roadways. Classification changes would be required because of land use changes as well as redistribution of traffic on existing Mobility Element roadways. Proposed changes in the CPU area circulation network are summarized in Table 3-4. These changes are proposed based on future roadway capacity needs.

TABLE 3-4
CPU ROADWAY CLASSIFICATIONS

Street	Segment	Existing CP Class	CPU Class
Otay Mesa Road	Street A to Caliente Ave.	6-PA	6-M
	Alisa Ct. to La Media Rd.	6-PA	6-PA
	La Media Rd. to Piper Ranch Rd.	7-M	6-PA
	Piper Ranch Rd. to SR-125	8-M	6-PA
	SR-125 to Harvest Rd.	4-P	6-PA
	Harvest Rd. to Sanyo Ave.	4-M	6-PA
	Sanyo Ave. to Enrico Fermi Dr.	4-M	6-PA
Airway Road	Heritage Rd. to Cactus Rd.	4-M	6-PA
	Cactus Rd. to Britannia Blvd.	4-M	6-M
Siempre Viva Road	Caliente Ave. to West Terminus	4-M	2-CL
Caliente Avenue	Otay Mesa Rd. to SR-905	6-M	6-PA
	SR-905 to Airway Rd.	6-M	6-PA
	Airway Rd. to Beyer Blvd.	4-M	6-M
Heritage Road/Otay Valley Road	Avenida De Las Vistas to Datsun St.	6-M	6-PA
	Datsun St. to Otay Mesa Rd.	6-M	6-PA
	Otay Mesa Rd. to SR-905	6-M	6-PA
	SR-905 to Airway Rd.	6-M	6-PA
Cactus Road	Otay Mesa Rd. to Airway Rd.	4-CL	4-M
	Airway Rd. to Siempre Viva Rd.	4-CL	4-M
Britannia Boulevard	Otay Mesa Rd. to SR-905	4-M	6-PA
	SR-905 to Airway Rd.	4-M	6-PA
	Airway Rd. to Siempre Viva Rd.	4-M	6-M
	Siempre Viva Rd. to South End	2-C	4-CL
La Media Road	Birch Rd. to Lone Star Rd.	6-PA	N/A
	Lone Star Rd. to Aviator Rd.	6-PA	4-M
	Aviator Rd. to Otay Mesa Rd.	6-PA	4-M
	Airway Rd. to Siempre Viva Rd.	4-M	5-M
Harvest Road	South of Otay Mesa Rd.	4-M	2-CL
	Airway Rd. to Otay Center Dr.	4-M	4-CL
	Otay Center Dr. to Siempre Viva Rd.	4-M	4-CL
Enrico Fermi Drive	Airway Rd. to Siempre Viva Rd.	4-M	4-CL
	Siempre Viva Rd. to Via de la Amistad	4-M	4-CL
Lone Star Road	SR-125 to Piper Ranch Rd.	4-M	6-PA
	Piper Ranch Rd. to City/County Boundary	4-M	6-PA
Aviator Road	Heritage Rd. to La Media Rd. [1]	2-C	4-CL
Corporate Center Drive	Progressive Ave. to Innovative Dr.	2-C	2-CL
Sanyo Avenue	Otay Mesa Rd. to Airway Rd. [2]	4-C	4-CL
Paseo de las Americas	Airway Rd. to Siempre Viva Rd.	2-C	4-CL
	Siempre Viva Rd. to Marconi Dr.	2-C	4-CL
Marconi Drive	Paseo de las Americas to Enrico Fermi Dr.	2-C	2-CL
Otay Center Drive	Harvest Rd. to Siempre Viva Rd.[2]	4-C	4-CL
St. Andrews Avenue	Otay Mesa Center Rd. to La Media Rd.	2-C	4-CL
Gailes Boulevard	Otay Mesa Rd. to St. Andrews Ave.	2-C	4-C
Otay Mesa Center Road	Otay Mesa Rd. to St. Andrews Ave.	2-C	4-CL
Datsun Street	Innovative Dr. to Heritage Rd. [1]	2-C	4-CL
Avenida Costa Azul	Otay Mesa Rd. to St. Andrews Ave. [1]	2-CL	4-CL
Excellante Street	Airway Rd. to Gigantic St.	4-C	2-C
Gigantic Street	Excellante St. to Centurion St.	4-C	2-C
Centurion Street	Airway Rd. to Gigantic St.	4-C	2-C

[1] A new roadway added to Mobility Element by the CPU.
[2] Functional classification is identified in the table, as the roadway is not currently classified.

Legend

8-M	= 8-lane Major Arterial	5-M	= 5-lane Major Arterial (3SB/2NB)	2-CL	= 2-lane Collector (with continuous left-turn lane)
7-PA	= 7-lane Primary Arterial	4-P	= 4-lane Primary Arterial	4-C	= 4-lane Collector (w/o continuous left-turn lane)
7-M	= 7-lane Major Arterial	4-M	= 4-lane Major Arterial	2-CN	= 2-lane Collector (no fronting property)
6-PA	= 6-lane Primary Arterial	4-CL	= 4-lane Collector (w/continuous left-turn lane)	2-C	= 2-lane Collector (w/o continuous left-turn lane)

Construction of the Mobility Element Roadway Network would occur as future implementing actions to the CPU through either capital improvement projects or in conjunction with future development projects. Mobility Element roadway improvements are addressed in this PEIR at a program-level and would require subsequent environmental review and approvals. Conceptual alignments of the proposed roadway network are shown on Figure 3-6.

3.4.5 CPU Implementation

The CPU would be implemented through a number of different mechanisms that are outlined in Chapter 11 of the CPU. It describes the necessary actions and key parties responsible for realizing the CPU's vision. Implementing these mechanisms would require the active participation of the City departments and agencies; regional agencies such as SANDAG and MTS; and the community. The CPU also recommends a number of funding mechanisms for the City to pursue as ways to finance the implementation of the CPU in a viable manner.

3.4.5.1 Implementing Actions

- Amend the General Plan.
- Rezone concurrently with the adoption of the CPU and associated actions by the City Council.
- Completion of circulation network and public facilities improvements.
- Completion of a PFFP identifying present and future community needs, the capital improvements necessary to accommodate future development, and the sources for financing the improvements.
- Formation of additional assessment districts and community facilities districts through the cooperative efforts of property owners and the community.

3.4.5.2 Amendments to the Community Plan

Changes to the CPU, following its adoption and associated actions, may be proposed in order to address circumstances and opportunities. If approved, they would take the form of amendments. Within the Southwest and Central Village areas, specific plans would be processed as plan amendments. The City's Planning Commission and City Council are responsible for reviewing and evaluating recommendations, and/or approving any amendments. Any proposed amendment would be subject to environmental review.

3.4.5.3 Funding Mechanisms

Implementing improvement projects would require varying levels of funding. A variety of funding mechanisms would be available depending on the nature of the improvement project:

- Instituting facilities benefits assessments for new development impact fees for intensification of uses.
- Requiring certain public improvements as part of new development.
- Establishing community facilities districts and/or infrastructure funding districts for specified infrastructure.
- Applying for grants from the state and federal government for improvements due to regional impacts from cross-border facilities.
- Creating assessment districts to help fund operations and management.

3.4.5.4 Priority Public Improvements and Funding

Improvements to streets and open spaces vary widely in their range and scope; some would be implemented incrementally as scheduled street maintenance occurs, and others would require significant capital funding from city, state, regional, and federal agencies. Working with other city agencies, these projects would be prioritized and included in SANDAG's RTP. Grants and other sources of funding would be pursued wherever possible.

3.4.5.5 CPU Administration

As indicated above, the CPU would implement the General Plan policies through the provision of more community-specific recommendations. The concurrent rezone would rescind the OMDD and update zoning regulations within the CPU area. Amendments to the LDC would also be required to create implementing zones for proposed commercial and industrial land use designations under the CPU. An updated PFFP would be adopted concurrently to allow for implementation of the CPU.

3.4.5.6 Future Actions

The CPU would be implemented through subsequent activities, requiring a variety of discretionary and ministerial actions. These subsequent activities would be public (i.e., roads, parks, public facilities) or private projects and are referred to as future development or future projects in the text of the PEIR. A non-exclusive list of regulatory actions required for future implementing activities is shown on Table 3-5.

TABLE 3-5
FUTURE ACTIONS

City of San Diego Actions
- Community Plan Amendments (for Specific Plan Areas)
- Specific Plans (for Specific Plan Areas)
- Rezoning
- Tentative Maps
- Planned Development Permits
- Site Development Permits
- Multi-Habitat Planning Area Boundary Line Adjustments
- Update the Public Facilities Financing Plan and Facilities Benefit Assessment
- Formation of Community Facilities Districts
- Conditional Use Permits
- Neighborhood Development Permits
- Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications
- Encroachment permits for maintenance of structures by an entity other than the City within City right-of-way
- Ministerial permits for grading, storm water infrastructure, water and sewer infrastructure and road improvements

State of California Actions
- Local Agency Formation Commission (LAFCO) Annexation
- Caltrans Encroachment Permits
- Section 1602/1603 Streambed Alteration Agreements
- Caltrans 2081 Memorandum of Understanding for State Endangered Species
- Water Quality Certification Determination for Compliance with Section 401
- Department of Education approval of school sites

Federal Actions
- Section 404 Permits
- USFWS Section 7 or 10 (a) Take Authorization
- FAA Determinations

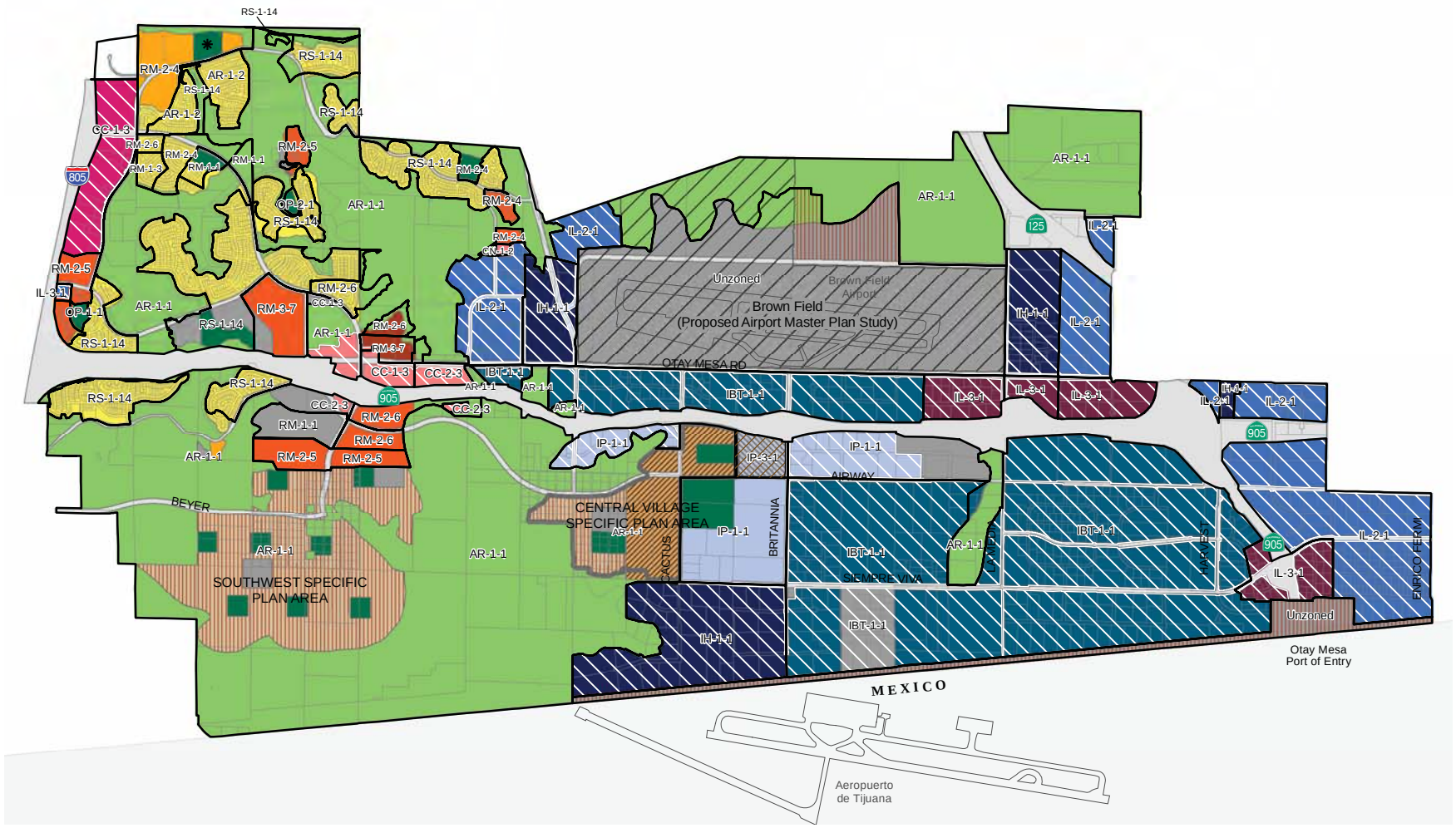
Other Agencies Actions
- San Diego County Regional Airport Authority Consistency Determination
- SDG&E/Public Utilities Commission approval of powerline relocation
- APCD Authority to Construct/Operate

3.5 Zoning

The CPU process includes adoption of a zoning ordinance which would rescind the existing OMDD zoning and replace it with citywide zones contained within the LDC (Figure 3-9). Amendments to Chapter 13, Article 01, Division 06 of the LDC would be required to: 1) incorporate an IBT-1-1 zone to implement the IBT land use category; and 2) incorporate the IP-3-1 Zone to implement the Business Park – Residential Permitted land use category, as summarized in Table 3-1.

The intent of the IBT Zone is to encourage uses that interact with and support industrial and international trade with Mexico and other global markets. This zone would allow for single- and multi-tenant office, research and development, light manufacturing, and storage and distribution uses. Commercial uses within the IBT would be subject to a

Map Source: City of San Diego



0 Feet 3,000

General Land Use Categories

Parks, Open Space, and Institutional

- Open Space
- Parks
- Institutional

Village Centers

- Neighborhood Village 15 - 25 du/ac
- Community Village 30 - 35 du/ac

Residential

- Residential - Very Low 0-4 du/ac
- Residential - Low 5-9 du/ac
- Residential - Low Medium 10-14 du/ac
- Residential - Medium 15-29 du/ac
- Residential - Medium High 30-44 du/ac

Commercial - Residential Prohibited

- Community Commercial
- Regional Commercial
- Heavy Commercial
- ✱ Potential Residential Site if Park Relocated

Industrial - Residential Prohibited

- Business Park - Office Permitted
- Light Industrial
- International Business and Trade
- Heavy Industrial
- Business Park - Residential Permitted 15 - 44 du/ac
- Business Park - Residential Permitted CPIOZ

Overlays

- U.S. Government Facility
- Brown Field Boundary
- Community Plan Boundary
- Proposed Otay Mesa CPIOZ

FIGURE 3-9

Otay Mesa Proposed Zoning

floor area ratio (FAR) limitation of 0.3, and industrial uses would be subject to an FAR limitation of 0.5. (These standards would be included in the City's LDC.)

Like the other Industrial Park (IP) Zones, the intent of the IP-3-1 Zone is to provide for high-quality science and business park development. The property development standards of this zone are intended to create a campus-like environment characterized by comprehensive site design and substantial landscaping. The IP-3-1 Zone would allow for research and development, office, and residential uses. Residential uses within the IP-3-1 Zone would be permitted in accordance with the Business Park - Residential Permitted CPIOZ of the CPU and should comprise no more than 49 percent of the lot area. Additionally, rresidential development would be required to comply with the development regulations of the RM-2-5 or the RM-3-7 zone as determined by the density identified in the Business Park - Residential Permitted CPIOZ of the CPU, except that the lot area, lot dimensions, floor area ratio, and setback requirements of the IP-3-1 zone shall apply.

Additionally, two new Community Plan Implementation Overlay Zones (CPIOZ)s ~~(LCD §132.14)~~ would be adopted concurrently with the CPU requiring an amendment to Chapter 13 Article 02 Division 14 of the LDC. The first, the Otay Mesa (OM) CPIOZ, would apply to the areas designated for commercial and industrial uses as shown on Figure 3-9. The second CPIOZ is the Business Park, Residential Permitted (BPRP) CPIOZ~~. The BPRP CPIOZ~~ and includes the approximately 28-acre site designated Business Park, Residential Permitted just west of Britannia Boulevard and north of Airway Road. ~~The CPIOZ standards below shall apply to the areas designated as Otay Mesa and Business Park, Residential Permitted by the Community Plan.~~

~~shown on Figure 3-9. The second CPIOZ is the Business Park, Residential Permitted (BPRP) CPIOZ. The CPIOZ standards below shall apply to the areas designated as Otay Mesa and Business Park, Residential Permitted by the Community Plan.~~

Otay Mesa (OM) Community Plan Implementation Overlay Zone

OM CPIOZ is required to ensure protection of sensitive resources, construction of the circulation infrastructure, and conformance with the appropriate policies from the Urban Design Element.

OM - CPIOZ Type A

The following standards apply to the area designated for commercial and industrial uses as shown in Figure 3-9. Future commercial and industrial development applications for properties identified on Figure 3-9 that are consistent with the CPU, the based zone regulations, and these supplemental regulations will be processed ministerially (CPIOZ A) in accordance with the procedures of the CPIOZ (Municipal Code

Chapter 13, Article 2, Division 14). Development that complies with all of the following shall be processed as CPIOZ A:

1. Development on properties that have not been previously graded, or have been graded but have not otherwise developed, and comply with all of the following:

    a. Submittal of an Archaeological Survey prepared by a qualified archaeologist in accordance with the Historical Resources Guidelines, confirmed and accepted by the City Manager, stating there is no presence of archaeological resources on site.

    b. Submittal of paleontological documentation prepared by a qualified paleontologist in accordance with the Paleontology Guidelines, confirmed and accepted by the City Manager, stating there is no presence of paleontological resources on site.

    c. Submittal of a Focused Biological Resources Survey prepared by a qualified biologist in accordance with the Biology Guidelines of the LDC, confirmed and accepted by the City Manager, stating there is no presence of sensitive plants or animal species, or habitats on site.

2. Development on properties that that have been previously graded and developed with structures, and conform to the following policies of the Urban Design Element of the Otay Mesa Community Plan:

    a. For all industrial development, proposals shall conform to

        i. Section 4.1: Policy 4.1-10;

        ii. Section 4.2: Policies 4.2-1, 4.2-2 a-c, 4.2-4, 4.2-5, 4.2-6, 4.2-8 b, 4.2-9, 4.2-10, and 4.2-11,

        iii. Section 4.3: 4.3-1 and 4.3-2 for properties adjacent to canyons and Open Space, 4.3-4 for proposals along Airway Road, 4.3-3, 4.3-5, and 4.3-7 for all proposals,

        iv. Section 4.5: All policies.

        v. Section 4.8: All policies.

        vi. Section 4.9: All policies.

        vii. Section 4.10: Policy 4.10-1.

b. For all commercial development, proposals shall conform to

i. Section 4.1: Policies 4.2-1, 4.2-2 a-c, 4.2-4, 4.2-5, 4.2-6, 4.2-8 b, 4.2-9, 4.2-10, 4.2-11,

ii. Section 4.3: 4.3-1 and 4.3-2 for proposals adjacent to canyons and Open Space, 4.3-4 for proposals along Airway Road, 4.3-5 and 4.3- 7 for all proposals,

iii. Section 4.4: All policies.

iv. Section 4.8: All policies.

v. Section 4.9: All policies.

vi. Section 4.10: Policy 4.10-1.

3. Development that includes construction of the abutting street(s) to the street classification identified in the Mobility Element of the Otay Mesa Community Plan.

4. Documentation from a California Registered Traffic Engineer, confirmed and accepted by the City Engineer, stating that the proposed project's traffic volumes are based on the City's trip generation rateds and are less than 1,000 ADT's.

OM - CPIOZ Type B

Development proposals that do not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone shall apply for a Process 3 CPIOZ Type B permit. Applications for a Process 3 CPIOZ Type B permit shall meet the purpose and intent of the regulations of the underlying zone and the supplemental regulations. Deviations from these regulations may be granted by the City Manager in accordance with the procedures of the CPIOZ (Municipal Code Section 132.1403).

Business Park, Residential Permitted Community Plan Implementation Overlay Zone

BPRP CPIOZ is required to ensure a maximum area for residential development and conformance with the appropriate policies from the Urban Design Element.

BPRP - CPIOZ Type A

The following standards apply to the area designated for Business Park, Residential Permitted as shown in Figure 3-9. Future development applications for properties identified on Figure 3-9 that are consistent with the community plan, the based zone

regulations, and these supplemental regulations will be processed ministerially (CPIOZ A) in accordance with the procedures of the Community Plan Implementation Overlay Zone (Municipal Code Chapter 13, Article 2, Division 14). Development that complies with all of the following shall be processed as CPIOZ Type A:

1. A minimum of 51 percent of the Business Park, Residential CPIOZ area shall be developed with industrial use.

2. Residential development may occur provided that :

    a. Residential development not exceed 49 percent of the Business Park Residential CPIOZ;

    b. The residential development is at a density of 15-44 dwelling units per acre, and

    c. The residential development is developed in accordance with the development regulations of the RM-3-7 zone, except that the lot area, lot dimensions, floor area ratio, and setbacks be in accordance with the IP-3-1 zone.

3. Development is in conformance with the following policies of the Urban Design Element of the Otay Mesa Community Plan:

    a. Section 4.1: Policy 4.1-9;

    b. Section 4.2: Policies 4.2-1, 4.2-2 a-c, 4.2-5, 4.2-6, 4.2-8 b, 4.2-9, 4.2-10, 4.2-11;

    c. Section 4.3: 4.3-3, 4.3-1, 4.3-5, 4.3-7;

    d. Section 4.5: Policies 4.5-1 – 4.5-9;

    e. Section 4.8: All policies;

    f. Section 4.9: All policies;

    g. Section 4.10: Policy 4.10-1.

BPRP - CPIOZ Type B

Development within the Business Park Residential Permitted CPIOZ that is not consistent with the CPU, base zone regulations, and these supplemental regulations for CPIOZ Type shall be processed as CPIOZ Type B. Development proposals on any parcel identified as CPIOZ Type B shall be required to obtain discretionary approval processed as a Site Development Permit in accordance with the Municipal Code Chapter 12, Article 6, Division 5.

3.6 Sustainability

Several sustainable building concepts and practices have been incorporated into the CPU policies. These design elements serve to reduce or avoid potential environmental effects associated with water and energy consumption, consumption of nonrenewable or slowly renewing resources, and urban runoff.

- ***Mixed-Use/Transit-Oriented Village Centers***. The CPU proposes two mixed-use village opportunity areas, centered on transit stations, educational and recreational facilities. The village concept is intended to reduce vehicle trips and miles traveled and support walking and biking as a transportation choice. The SANDAG RTP identifies a bus rapid transit corridor (the South Bay Bus Rapid Transit [BRT]) that would connect to the bus route that would travel through the two village centers and lead to the orange line trolley and downtown San Diego. In addition, implementation of the policies contained in the Land Use, Mobility, Recreation, and Conservation elements of the CPU would improve mobility within the CPU area, and surrounding neighborhoods through the development of a more balanced, multi-modal transportation network, including a more complete bicycle network.

- ***Low Impact Development***. Much of the CPU area is undeveloped or underdeveloped. The Conservation Element calls for storm water to be managed through low-impact development (LID) principles including the use of pervious surface materials, appropriate design of infrastructure, and other hydro-management techniques. Urban Design Policy 4.9-5 establishes several best management practices to be integrated into new development.

- ***Urban Forest and Agriculture.*** The Conservation Element of the CPU sets forth policies for enhancing the community's urban forest and establishing community gardens. Street tree and private tree planting programs are low cost, low-technology methods for improving the visual landscape and air quality in Otay Mesa. Implementation of the Otay Mesa urban forest would require consistency with the Landscape Standards of the LDC and the Otay Mesa Community Street Tree List (Appendix B of the CPU), which requires all development to plant and maintain street trees as identified in the tree list. Conservation Policy 8.6-1 advocates the creation of community gardens where there would be sufficient demand, appropriate land, and where they would not generate adverse impacts on adjacent uses.

- ***Water, Wastewater, and Storm Water Infrastructure.*** Implementation of Wastewater, Water, and Storm Water Infrastructure policies in Sections 6.2 through 6.4 of the Public Facilities, Safety, and Services Element provide for expansion of water and sewer facilities, while improving the sustainability of the

systems through LID design, reclaimed water, and improved drainage facilities to address flooding problems within the plan area. In addition, Policy 4.9.5 of the Urban Design Element would ensure that the design of development integrates storm water best management practices on-site to maximize their effectiveness by: encouraging the use of intensive and extensive green roofs and water collection devices, such as rain barrels, to capture rainwater from the building for reuse; minimizing on-site impermeable surfaces, such as concrete and asphalt; and utilizing permeable pavers, porous asphalt, reinforced grass pavement (turf-crete), or cobble-stone block pavement to detain and infiltrate runoff on-site.

- ***Diversity and Affordability of Housing***. The CPU aims to provide affordable single- and multi-family housing throughout the CPU area, thus enabling a wide range of economic levels and age groups to live within the community. Specifically, the Land Use Element includes Affordable Housing Policies 2.2.-5 through 2.2-8 that promote and encourage the development of very low and low income affordable housing in all residential and village designations, creation of affordable home ownership opportunities for moderate income buyers, and utilization of land use, regulatory and financial tools to facilitate the development of housing affordable to all income levels.

- ***Bicycle Network.*** In order to reduce reliance on fossil fuels and encourage alternative modes of transportation in the CPU area, the CPU aims to provide a safe bicycle network that connects community destinations and links to surrounding communities and the regional bicycle network. In support of this goal, the Mobility Element includes Bicycle Policy 3.4-1. Specifically, implementation of Policy 3.4-1 would provide and support a continuous network of safe, convenient, and attractive bicycle facilities connecting the project area to the citywide bicycle network and implementing the San Diego Bicycle Master Plan.

- ***Access to Outdoor and Active Spaces.*** The CPU addresses existing and planned access to outdoor and active spaces and provides for on-site active and passive open space areas, recreational facilities, and access via pedestrian and bicycle pathways. Many of the outdoor and active uses would be universally accessible. In addition, the provision of these outdoor uses would encourage walking or other physical activity and time spent outdoors, thus promoting good health and community life. The CPU identifies the need for land acquisition for the creation of public parks, with a special effort to locate new parkland within the community that promotes connectivity, safety, public health, and sustainability, and includes strategies to expand programming within existing public spaces. The Recreation Element includes policies to provide adequate parkland sufficient to meet the needs of the community through plan buildout. Policies 7.1-1 through 7.1-11 provide guidance for assessing park needs and locations; Policies

7.1-12 through 7.1-15 pertain specifically to the location and design of Grand Park; and Policies 7.2-1 through 7.2-6 pertain to the provision of access to open space areas (non-developed) and trails, while balancing the needs of biological communities.

- ***Improved Transportation Network and Increased Alternative Modes of Transportation.*** The CPU includes several policies aimed at improving the existing transportation network as well as encouraging alternative modes of transportation to reduce impacts related to traffic/circulation and air quality. The Mobility Element includes specific policies to support a full, equitable range of choices for the movement of people and goods to, within, and from the project area community. In addition, the Mobility Element supports and helps to implement the General Plan at the community plan level by including specific goals, policies, and recommendations that would improve mobility through the development of a balanced, multi-modal transportation network. Specifically, the Mobility Element includes Walkability Policies 3.1-1 through 3.1-4, which promote and encourage new construction and upgrades to existing pedestrian pathways; Transit Policies 3.2-1 through 3.2-5, which improve access to public transit facilities (i.e., BRT); and Bicycle Policy 3.4-1, which would provide for a continuous network of bicycle facilities connecting the CPU area to the citywide bicycle network. In support of General Plan Policies UD-D.1 through D.3, Land Use Element Policy 2.1-2 would integrate the use of transit within employment areas. The creation of safe and direct bicycle and pedestrian connections are also encouraged to provide multi-modal access.

- ***Energy Efficiency in Buildings***. The Urban Design and Conservation Elements of the CPU include policies to reduce air, water, and land pollution, and other environmental impacts associated from energy production and consumption. The Urban Design Element states that development of new buildings would take into account energy efficient design. Specifically, Policies 4.9-2 through 4.9-3 recommend macro- and micro-level design solutions including, but not limited to: providing awnings and canopies to shade buildings; orienting new buildings and lots to minimize east- and west-facing façades; use of horizontal overhangs, awning or shade structures above south facing windows to mitigate summer sun, but allow winter sun; and maximizing natural and passive cooling. Implementation of Green Building Policies 4.9-4 of the Urban Design Element would ensure the incorporation of environmentally conscious landscape practices that minimize heat gain and provide attractive and context sensitive landscape environments. In addition, the Conservation Element includes Sustainable Development Policies 8.2-1 through 8.2-6.

- ***Reduced Water Use.*** To reduce the overall water use and potential impacts to natural water resources and the municipal water and wastewater systems from

buildout, the CPU includes policies to encourage the use of reclaimed water and recycled water infrastructure, including the use of captured rainwater for landscape irrigation and the use of native drought-tolerant plants. Implementation of Policy 4.9-5 of the Urban Design Element would encourage the use of intensive and extensive green roofs and water collection devices, such as rain barrels, to capture rainwater from the building for reuse. The policies contained in the Conservation Element promote the expansion of reclaimed water and recycled water infrastructure in conjunction with new development. Implementation of Policies 6.2-1 through 6.4-3 of the Public Facilities Element would ensure upgrades to the infrastructure for water and sewer facilities while improving efficiency in these systems.

- ***Heat Island Reduction.*** To reduce heat islands and minimize the impact on microclimate, the CPU includes policies to encourage the use of shade canopies, shade trees, reflective paving materials, and an open grid pavement system for impervious portions of the project area (i.e., roads, sidewalks, upper decks of parking structures, parking lots).

- ***Air Quality.*** The Conservation Element includes policies to reduce the project's impacts on air quality and climate change. The Conservation Element includes Air Quality Policies 8.7-1 through 8.7-8, which call for enforcement of designated truck routes, encourage alternative modes of transportation, institution of buffers between incompatible land uses, and encourage street tree and private tree planting programs throughout the community to increase absorption of carbon dioxide and pollutants. In addition, implementation of Climate Change and Sustainability Policies 8.2-1 through 8.2-6 aim to reduce project-level greenhouse gas emissions to acceptable levels through project design, application of site-specific mitigation measures, or adherence to standardized measures outlined in the City's General Plan Climate Protection Action Plan.

- ***Collocation.*** In order to reduce health hazards and other potential impacts associated with the collocation of industrial and residential uses, the CPU proposes several policies that address collocation, the interface of residential and village uses with industrial lands, and the provision of buffers. Impacts associated with collocation are discussed in Section 5.1.4 of this PEIR.

In addition to the sustainable building concepts and practices detailed above, compliance with existing regulations would be required and have been incorporated into the CPU to avoid or reduce environmental impacts. These are further described below in Table 3-6.

TABLE 3-6
ENVIRONMENTAL / REGULATORY COMPLIANCE SUMMARY

Subchapter/Issue	ENVIRONMENTAL / REGULATORY COMPLIANCE SUMMARY
5.2 Landform Alteration/Visual Quality	To reduce impacts to aesthetic impacts and visual compatibility of land uses: • Future projects would be required to ~~adhere to~~ demonstrate compliance with the CPU land use and development design guidelines.
5.3 Air Quality/Odor	To reduce impacts from construction emissions: • Construction operations of future development are subject to the requirements established in Regulation 4, Rules 52 and 54, of the San Diego APCD's rules and regulations. • Grading Ordinance
5.4 Biological Resources	To reduce impacts to sensitive species: • Future development would be required to conduct site specific surveys to identify the presence of sensitive habitats and species, as well as any protocol surveys required by state or federal agencies, and determine the extent of the impacts.
	To reduce indirect effects to any biological resources: • All future development must implement the Land Use Adjacency Guidelines and policies contained within the MSCP Subarea Plan
5.6 Human Health/ Public Safety/ Hazardous Materials	To reduce the threat of wildfires: • The City requires that projects demonstrate compliance with the Brush Management Regulations through submittal of Brush Management Plans in accordance with Chapter 14, Article 02, Division 04 of the LDC which are intended to address measures to reduce the risk of significant loss, injury, or death involving wildland fires for each individual project.
	To reduce fire hazards: • As a standard condition of approval, future development would be required to comply with the 2007 California Fire Code (CFC) requirements. To reduce the risk of an explosion or the release of hazardous substances future development would be required to comply with: • State law (California Health and Safety Code) that requires the mapping of "general areas" within which hazardous waste facilities might be established. • CPU policies that address residential – industrial interface and the use of hazardous materials. • Municipal Code, Public Safety Morals and Welfare Regulations pertaining to hazardous and flammable materials, explosives, etc. To reduce potential hazards associated with international truck traffic: • International trucks traffic would be required to adhere to the specific circulation plan defined in the CPU Mobility Element.
5.7 Hydrology/Water Quality	To reduce impacts associated with increased impervious surfaces, runoff and water quality: • Future development would be required to implement storm water discharge BMPs and develop a Storm Water Pollution Prevention Plan and monitoring program plan consistent with the City's Storm Water Regulations (City's Storm Water Management and Discharge Control Ordinance (MC §43.0301) and NPDES General Permit No. CAS000002).

TABLE 3-6
ENVIRONMENTAL / REGULATORY COMPLIANCE SUMMARY
(continued)

Subchapter/Issue	ENVIRONMENTAL / REGULATORY COMPLIANCE SUMMARY
5.8 Geology/Soils	To reduce the potential for erosion, especially in steep slope areas: • Future development would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permits which would require Best Management Practices (BMPs) at the project-level.
	To control erosion during and after construction: • Future development would be required to comply with measures contained within the City's Grading Ordinance.
5.9 Energy Conservation	To promote sustainable development and reduce the consumption of electricity or fuel and other forms of energy: • Future development would be encouraged to reduce energy use and consumption through the CPU and guidelines contained in the General Plan. • For the future construction or renovation of municipal buildings, sustainable building practices are required in the City's Sustainable Building Policy (900-14).
5.10 Noise	To reduce impacts associated with an increase in the existing ambient noise level: • Future development would be subject to compliance with the General Plan Noise Compatibility Standards and the Noise Ordinance.
	To reduce noise impacts associated with residential - industrial interface: • Future development would be subject to the policies of the CPU and performance standards provided in the City's Noise Ordinance (MC § 59.5.0401).
	To reduce potential impacts associated with aircraft noise: • Future development would be required to comply with the noise level standards and land use compatibility guidelines in the Airport Land Use Compatibility Plan (ALUCP) for Brown Field.
5.14 Utilities	To reduce impacts from solid waste: • Future development in the CPU area would be required to provide space for recycling and incorporate recycling and waste reduction measures for construction, demolition, and occupancy. • Future development would be required to develop Waste Management Plans (WMP) targeting at least 75% waste reduction. To reduce impacts from Storm Drain Facilities: • Future development would be subject to LDC Storm Water Runoff and Drainage Regulations.
5.16 Population and Housing	To reduce impacts associated with population growth: • Future development would be subject to policies in the CPU that address the provision of affordable housing and would be required to comply with the City's Inclusionary Affordable Housing Ordinance.

3.7 Land Use Density and Intensity Methodology or Assumptions

For planning purposes, certain land use intensity and density assumptions were made in preparing the CPU. These assumptions were used to determine the number of expected residential dwelling units and population, expected non-residential square footage as well as in planning for public services. The methodologies described below were also used as the basis for determining density and intensity-based impacts addressed in this PEIR.

For the CPU, nearly all of the land use categories define a range of residential densities and non-residential intensities, expressed as du/ac and FAR, respectively. Dwelling units per acre refers to the number of housing units divided by the residential acres. FAR refers to the building square footage divided by the site area. The method of calculation for future development would be provided through the CPU land use density ranges, as the rezoning of the village areas would occur with the approval of future specific plans. As the CPU represents a long range plan and it is not possible to exactly predict the future intensity of build-out for the CPU horizon year, it was necessary to make practical assumptions of intensity within the given ranges for each land use category. For non-residential intensity, the City of San Diego's Land Development Code Trip Generation Manual (revised May 2003) was used to derive appropriate trip generation rates for the various land use designations, which were then converted to an FAR. In all cases, the intensity assumption was based on lot acreage.

For residential land use designations, an average of approximately 75 percent of the maximum of the density range was calculated and added to the low number of the density range. The percentage varied in different locations within the CPU area, because certain areas of the CPU are already developed and some areas are entitled for development. In all cases, the density assumption was based on gross acres. Within mixed-use designations, a land use mix was used. The "Village" and "Business Park-Residential Permitted" mixed-use designations were based on approximately 50 percent of the maximum density for residential portions of the gross area within these designations~~, because a market for the highest density housing, such as what is developing in downtown San Diego, would develop during the latter years of community build-out (not during the CPU planning horizon)~~. The projected CPU buildout residential densities and land use intensity are summarized in Table 3-7.

For industrial and commercial land use designations, buildout intensity assumed a 0.5 FAR for industrial areas and 0.3 FAR for commercial. Land use buildout assumptions for the IBT land use category are: business park 20 percent; industrial park 30 percent; manufacturing 10 percent; office 10 percent, and warehousing 30 percent.

No housing density was presumed to occur within the Open Space land use designation, which includes both MHPA and other open space.

It is important to be conservative, yet realistic, in making assumptions for housing yield, as schools, parks, libraries and other public facilities are programmed and funded based on population and housing unit yield. The need for public facilities would be based on these assumptions and determined at the time future development is implemented in accordance with the CPU.

The methodology and assumptions used in the evaluation of impacts to utilities is described in the Section 5.14, Utilities of this PEIR and Appendix L. The circulation element network and specific trip rates used in the traffic report are described in the Section 5.12, Traffic/Circulation of this PEIR and Appendix J.

TABLE 3-7
OTAY MESA BUILDOUT LAND USE SUMMARY

Land Use	Input Vehicle Trip Generation	
	Type	Amount
Single Family	du	4,273
Multi-Family	du	14,501
Elementary school	site	7
Junior College	student	5,000
Senior High School	student	4,800
IBT – Office[1]	ksf	2,771
L-R Office[1]	ksf	362
Heavy Industry[1]	ksf	8,458
IBT- Industrial Park[1]	ksf	8,034
IBT - Business Park[1]	ksf	5,356
Industrial Park[1]	ksf	6,020
Light Industry LGR IP[1]	ksf	12,685
IBT - Manufacturing[1]	ksf	2,678
Commercial Airport	Flt	682
Community Commercial[2]	ksf	3,848
Neighborhood Commercial[2]	ksf	69
Gas Station w/fdmt	pump	27
IBT- Warehouse[1]	ksf	8,034
Truck Storage	acre	30
Warehouse or Storage	ksf	63
Active Park	acre	166
Cross Border Facility (CBF)	Passenger	17,225
Lodging - Hotel (BRWN FLD & CBF)	room	570
Air & Space Museum (BRWN FLD)		360
Restaurant (BRWN FLD)		30
Park & Ride (BRWN FLD)	Site	1
Solar Field (BRWN FLD)		67
Communication or Utility	acre	6
OMPOE in/out Laden	truck	2,000
OMPOE in/out unladen	truck	4,000
Church	site	5
Police or Fire Station	site	11
Other Health Care	ksf	293

SOURCE: City of San Diego 2011a.
[1]Industrial square footage total of 54,461,000
[2]Commercial square footage total of 3,917,000

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4.0 History of Project Changes

The City initiated the process of updating the 1981 Otay Mesa Community Plan and issued the first NOP on May 12, 2004, with a public scoping meeting held in May 2004. That NOP addressed preparation of a Master EIR for the CPU with primary changes in six specifically designated neighborhoods. One person spoke at the scoping meeting. Several letters were received in response to the first NOP and are included in Appendix A.

Subsequent to the completion of the 2004 NOP process, the City determined that the CPU PEIR would consider different land use scenarios rather than evaluate neighborhood-specific development proposals. Therefore, during the next one and a half years, City staff along with a team of consultants, the Otay Mesa Community Planning Coalition, and community stakeholders produced three comprehensive land use scenarios. With this change to a more comprehensive approach for the planning area, it was determined that a PEIR would be prepared in order to evaluate these scenarios equally without focusing on a preferred alternative. A second NOP describing these changes was issued on September 12, 2006, and a second scoping meeting was held on September 25, 2006. Approximately eight people attended the second scoping meeting and four people spoke. There were 16 letters received in response to the second NOP.

In 2010, the City decided to revise and narrow the scope of the CPU to present only one land use plan to be analyzed fully in the PEIR. Additionally, it was determined that the PEIR would no longer provide site-specific impact analysis for Community Plan Circulation Element roadway alignments or the community-wide drainage facility, as previously proposed. A third NOP was issued in October 2010 which fully described the narrowed scope, however, a third scoping meeting was not held. This was based on the fact that the NOP provided enough detailed information about the narrowed scope which basically took one of the three land use scenarios from the second NOP and made it the subject of the analysis in this PEIR. Four comment letters were received in response to the third NOP. This PEIR considers the comments received from all of the NOPs and scoping meetings.

In accordance with CEQA Guidelines, the baseline for establishing the environmental setting and existing conditions is determined to be the date when the NOP is published. As described above, three NOPs were issued for the CPU (May 12, 2004, September 12, 2006, and October 1, 2010). Because the third NOP issued in 2010 more accurately describes the CPU, the City determined that use of the third NOP was the more appropriate and conservative baseline. The baseline for the purpose of this PEIR is, therefore those conditions occurring at the time of the third NOP and are the conditions upon which physical changes are examined in the PEIR. It should be noted

however, that the baseline for analysis of the Transportation/Circulation Section is different because of changes to the circulation system between when the 2010 NOP was issued and the time this PEIR was made public. This is specifically evident relative to State Route 905, which was under construction in 2010 and is now open for use within the CPU area; as well for the reopening of State Route 125. Additional information regarding the baseline analysis, consistent with a recent Supreme Court decision is further described in the Transportation/Circulation Section of the PEIR.

An extensive outreach program was undertaken to solicit input from various stakeholders, property owners, residents, community leaders, business owners, public officials, and other interested parties. Beginning in 2002, the outreach program entailed a series of community/stakeholder workshops, three EIR scoping meetings, a series of focused Planning Commission workshops, and monthly discussions at the City-recognized Otay Mesa Community Planning Group's regularly scheduled meetings. In addition, roundtable sessions consisting of small group discussions involving individuals and City staff were held in November 2005 through January 2006. A summary of the community outreach chronology is included as Appendix B.

As a result of comments received during public review and in order to provide consistency between the FEIR and OMCPU, the Project Description (Chapter 3) ~~and~~ has been updated to correct planned land use acreages, provide further clarification regarding the two proposed Community Plan Implementation Overlay Zones which will be added to Chapter 13, Division 01, Article 06 of the City's Land Development Code, and to make minor revisions to text and tables. The Land Use Section (Section 5.1) has also been updated to reflect corrections to land use acreages as noted above in the Project Description and to correct text and tables. As noted in the Executive Summary and Environmental Setting Sections of the FEIR, the Nakano property, which is located in the far northwestern corner of the CPU, is not part of the CPU processing but may still be delineated in some figures with dashed lines. Acreage associated with the Nakano property was initially included in the DEIR, but has since been removed from the Project Description, Land Use (Chapter 5.1) and Biological Resources sections of the FEIR. As such, the FEIR now correctly reflects the CPU without the Nakano property. The Biological Technical Report, however, was not revised to remove the existing habitat or impact acreage associated with the Nakano property. Therefore, for the purpose of the biological technical analysis, the information reflected in the revised FEIR is correct.

Other sections of the FEIR have also been revised when compared to the DEIR. When revised in response to comments, they are shown in strikeout/underline formatting throughout this document; otherwise, all typographical errors or minor edits for clarification have been accepted and are not reflected in strikeout/underline formatting.

5.0 Environmental Impact Analysis

The following analyses provide information relative to 18 environmental topics as they pertain to the CPU. Each issue section is formatted to summarize the existing conditions, list the criteria for the determination of significance, analyze any potential impacts, list any required mitigation measures, and summarize the level of significance after mitigation. The City would require that the mitigation measures identified in this PEIR be implemented by subsequent future projects in accordance with the CPU, except in the following cases:

- The mitigation measure is not applicable to the project at hand; or
- Either the project proponent offers alternative mitigation that reduces the significant impact to a similar level as would be achieved by the mitigation identified in the PEIR; or
- The project proponent presents substantial evidence that the required mitigation measure is infeasible and that there is no feasible mitigation measure or alternative requiring preparation of a supplement or subsequent EIR. In this case, the Lead Agency must balance the benefits of the proposed project against the unavoidable significant environmental impacts to determine whether the unmitigated significant impacts are acceptable in view of specific overriding economic, social or other consideration (CEQA Guidelines Section 15093).

Topics subject to detailed analysis include those that were identified by the City of San Diego as having the potential to cause significant environmental impacts, and issues which were identified in the initial study and in response to the NOP and scoping meeting as having potentially significant impacts.

The 18 topics addressed in Chapter 5.0 are the following:

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

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5.1 Land Use

5.1.1 Existing Conditions

This section describes existing land uses in the CPU area and surrounding area, as well as existing relevant land use policies and regulations.

5.1.1.1 Existing Land Uses

a. On-site Land Uses

Existing land uses within the approximately 9,302-acre CPU area are shown in Figure 5.1-1, and acreages are provided in Table 5.1-1 below.

TABLE 5.1-1
CPU AREA - YEAR 2012 EXISTING LAND USE DISTRIBUTION

Land Use Categories	Acres[1]	% of Community
Residential		
Multi-Family (1,468 dwelling units)[2]	94	1.0%
Single-Family Detached (2,745 dwelling units)[2]	372	3.99%
Spaced Rural Residential	62	0.66%
Total Residential (4,213 dwelling units)[2]	528	5.7%
Commercial and Office		
Commercial and Office	116	1.24%
Shopping Centers	58	0.63%
Total Commercial (2.653 million square feet)	174	1.87%
Public Facilities, Institutions and Utilities		
Education	89	0.95%
Institutions	69	0.74%
Transportation, Communications, Utilities (includes I-905, completed)	1,898	20.4%
Total Public Facilities, Institutions and Utilities	2,056	22.1%
Agriculture		
Extensive Agriculture	161.5	1.73%
Intensive Agriculture	88	0.94%
Total Agriculture	249.5	2.68%
Industrial		
Heavy Industrial	17	0.18%
Light Industrial	977	10.5%
Total Industrial (33.323 million square feet)	994	12.7%
Parks and Recreation		
Open Space	2,580	27.7%
Recreation	98	1.05%
Total Parks and Recreation	2,678	28.8%
Other		
ROW (local)	586	6.3%
Undeveloped	2,036	21.8%
Total Other	2,622	
GRAND TOTAL	9,301[3]	100.00%

[1]SANDAG, 2012c Land Use, as updated per City of San Diego July 2013.
[2]SANDAG 2012b.
[3]Boundaries within different source data sets may have slight variations, thus resulting in an acreage discrepancy.

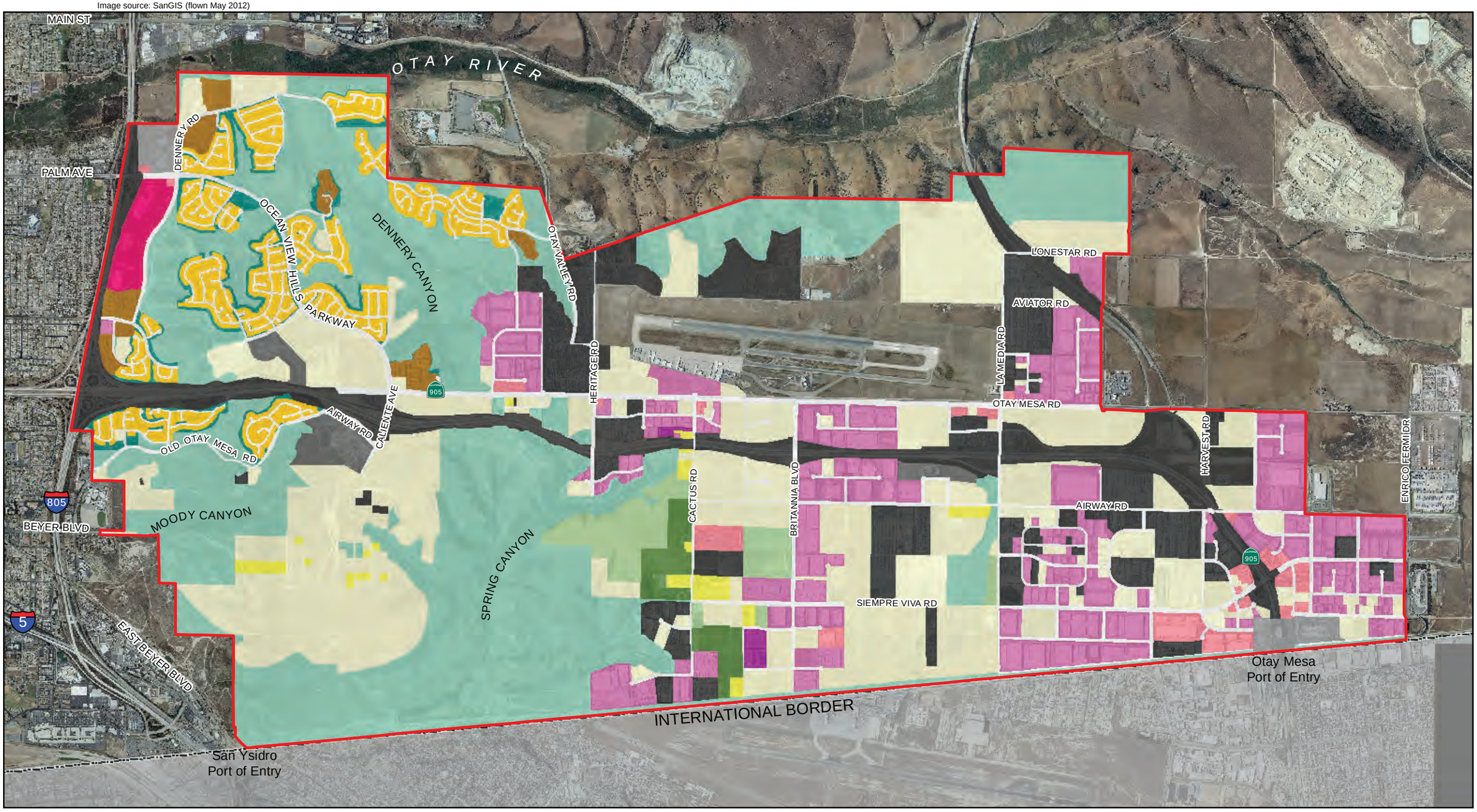
As shown in Figure 5.1-1 and in Table 5.1-1, open space comprises the largest existing land use (coverage) at approximately 2,580 acres, or slightly less than one-third of the total CPU area. These areas include the existing City MHPA-designated lands composed of Dennery, Moody, and Spring Canyons in the northwest and southwest, as well as the canyons north of Brown Field feeding into the Otay River Valley. The CPU area also includes approximately 98 acres of developed parkland and recreational uses, concentrated around residential areas in the northwest portion of the CPU area, and includes the five-acre Ocean View Hills Neighborhood Park, the six-acre Vista Pacifica Neighborhood Park, and the five-acre Ocean View Hills School Joint Use facilities.

The second largest existing land coverage within the CPU area is undeveloped land, occupying nearly one-third of the total CPU area, or 2,036 acres. As shown in Figure 5.1-1, existing undeveloped lands, which have designated land uses under the adopted community plan, occur between the open space canyons of the west and throughout the industrial and agricultural central and eastern portions of the CPU area.

Existing industrial uses, ranging from industrial parks, general light industry and warehousing to heavy industrial uses (e.g., concrete batch plants and processing of construction materials), comprise the next largest CPU area land use, occupying 1,184 acres. Of this amount, roughly 977 acres is developed in light industrial uses. Industrial uses are distributed throughout the central and eastern portions of the CPU area, primarily south of Otay Mesa Road and east of Heritage Road. Auto wrecking and dismantling facilities are concentrated in the area immediately west of Brown Field.

Public Facilities and Utilities comprise approximately 2,056 acres within the CPU area and include Brown Field, a general aviation airport owned by the City of San Diego occupying the central 734 acres of the CPU area. The airport's most notable feature is its 8,000-foot-long and 200-foot-wide runway which can accommodate most aircraft. Except for the period 1947-1951, the airport was used exclusively for military purposes until 1962. Since then, Brown Field has served as a general aviation airport and port-of-entry for private aircraft coming into the United States through Mexico, and is still used by military and law enforcement agencies. Other public facilities include institutional and educational uses, such as the new 53-acre San Ysidro High School, the 20-acre Ocean View Hills Elementary School, and a Kaiser Permanente medical campus.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Current Land Use (2012)

RESIDENTIAL
- Spaced Rural Residential
- Single Family Residential
- Multi-Family Residential

COMMERCIAL AND OFFICE
- Shopping Centers
- Commercial and Office

INDUSTRIAL
- Heavy Industrial
- Light Industrial

PUBLIC FACILITIES AND UTILITIES
- Transportation, Communications, Utilities
- Education
- Institutions

PARKS AND RECREATION
- Recreation
- Open Space Parks

AGRICULTURE
- Intensive Agriculture
- Extensive Agriculture

UNDEVELOPED
- Undeveloped
- Road & Railroad Rights of Way

0 Feet 2,500

FIGURE 5.1-1
Existing Land Use

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Residential uses, ranging from scattered rural residences, single-family subdivisions, and multi-family units, currently occupy approximately 528 acres or 5.7 percent of the CPU area. Existing single- and multi-family units occur in the northwest corner of the CPU area, north of Old Otay Mesa Road. These comprise the newer residential communities of Ocean View Hills, Denney Ranch, and Hidden Trails, among others, built since 1998. Existing older, rural residences are dispersed throughout the south-central portion of the CPU area, south of Otay Mesa Road between Cactus and La Media Roads. In 2000, there were 1,740 people living in 481 housing units; by 2012 there were 15,323 people living in 4,213 housing units in the CPU area (SANDAG 2012b). Approximately 65 percent of these units consisted of single-family homes and 35 percent consisted of multi-family units.

Approximately 249 acres of agricultural land, primarily field and row crops, cover roughly three percent of the CPU area, and is concentrated in the central area south of Otay Mesa Road. Some intensive agricultural uses such as dairies, chicken ranches, and nurseries also occur in this area. The area between Moody and Spring Canyons south of Otay Mesa Road was historically in agricultural production, but has been fallow in recent years.

Existing commercial uses (general commercial, office and retail) occupy approximately two percent of the CPU area at 174 acres. They are located primarily along SR-905 just north of the Otay Mesa POE and at the major intersections along Otay Mesa Road, including the intersections of Otay Mesa Road and Cactus, Britannia, and La Media Roads. These facilities generally consist of fueling stations and eating establishments to serve the local industrial employment population, including truck drivers. A shopping center also exists in the northwest corner of the CPU area, west of Dennery Road, south of Palm Avenue, and east of I-805. Also located within the CPU area is an existing health care facility in the far northwest corner.

The Otay Mesa POE is located in the far southeast portion of the CPU area, where SR-905/SR-125 terminates at the border with Mexico. The Otay Mesa POE, the largest commercial land port along the California-Mexico border, handles the third highest volume of trucks (at 1.4 million truck crossings in 2006) and is the 25th busiest port in the U.S. The Otay Mesa POE handles commercial truck inspections and serves autos and pedestrians as well.

The remainder of the CPU acreage is comprised of existing City right-of-way – approximately 586 acres.

b. Surrounding Land Uses

The undeveloped Otay River Valley is immediately north of the CPU area. The Otay River originates at the Lower Otay Reservoir approximately three miles northeast of the CPU area. The reservoir is owned by the City of San Diego and is used for storing

Colorado River water. The Otay River flows approximately 11 miles west from the reservoir into San Diego Bay, through the Cities of San Diego and Chula Vista. The Otay River Valley is part of the OVRP system and is designated for natural open space and limited recreational use. The portions of Dennery Canyon that transect the CPU area in the northwest corner are included in the regional park, as shown in Figure 2-3. The OVRP is managed through a Joint Exercise of Powers Agreement (JEPA) comprised of City of San Diego, Chula Vista, and County of San Diego residents and stakeholders (see Section 5.1.1.2.b). Further north of the river valley is the urbanized area of the City of Chula Vista.

Unincorporated county land lies east of the CPU area, and is largely undeveloped with dispersed industrial uses, including distribution, warehousing, and agriculture. This area is part of the County's East Otay Mesa Specific Plan area and is planned as a major employment hub and as an area for heavy industrial uses.

The City of Tijuana is located adjacent to the CPU area, south of the U.S.-Mexico border. Tijuana is an industrial community with a population of over one million and includes major manufacturing centers. The General Abelardo L. Rodríguez International Airportin Tijuana is directly south of the central CPU area.

The community of San Ysidro is west of the CPU area, south of SR-905 within the City of San Diego. A dominant feature in the San Ysidro community is the San Ysidro POE, which is currently the busiest in the western hemisphere and is approximately one-quarter mile west of the southeastern edge of the CPU boundary at the southern terminus of I-805. It is the region's primary cross-border gateway for auto and pedestrian traffic in both directions. Along the shared boundary between the San Ysidro and Otay Mesa Community Plan areas, existing land uses consist of schools, parks, and residences. The Otay Mesa-Nestor community is west of the CPU area north of SR-905. The portion of this community adjacent to the CPU area, between I-805 and I-5, is primarily residential.

5.1.1.2Relevant Plans, Policies, and Regulations

Development is guided by the City's General Plan, and more specifically by the adopted Otay Mesa Community Plan. In addition, various other local, regional, and state plans, programs, and regulations are utilized to evaluate development of land within the City of San Diego (Table 5.1-2). A discussion of the consistency of the CPU with all relevant plans is discussed below in Section 5.1.3.1, Impact Analysis.

TABLE 5.1-2
APPLICABLE DOCUMENTS

City of San Diego
- City of San Diego General Plan
- Otay Mesa Community Plan (1981)
- Zoning Ordinance (City of San Diego Land Development Code)
- Otay Mesa Development District (overlay district of the Land Development Code)
- Transit-Oriented Development Design Guidelines
- Environmentally Sensitive Lands Regulations
- Historical Resources Regulations
- Multiple Species Conservation Program (MSCP) Subarea Plan
- Airport Environs Overlay Zone
- Brown Field Airport Land Use Compatibility Plan
- Otay Mesa Precise Plans, including California Terraces, Dennery Ranch, Hidden Trails, Riviera del Sol, Otay International Center, Santee Investments, Remington Hills, and Robinhood Ridge*

Regional Plans
- SANDAG Regional Comprehensive Plan, including Smart Growth Concept Map
- SANDAG Regional Transportation Plan (2050)
- Metropolitan Transit Service Transit Plan
- San Diego Urban Water Management Plan, 2010
- Regional Air Quality Strategies

*See Figure 2-5 for location.

a. City of San Diego General Plan

A comprehensive update of the City's General Plan (March 10, 2008) is based on a new planning strategy for the City developed in the 2002 Strategic Framework Element. The Strategic Framework describes the role and purpose of the General Plan, outlines the City of Villages strategy, presents ten Guiding Principles that helped to shape the General Plan, summarizes the plan's elements, and discusses how implementation would occur.

Under the City of Villages strategy, the General Plan aims to direct new development away from natural undeveloped lands into already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

The General Plan includes ten elements that are intended to provide guidance for future development. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic

Preservation Element; and (10) Housing Element. The Housing Element was last updated in 2013 and is provided under separate cover due to the need for more frequent updates.

Land Use Element

The Land Use Element provides overarching policies to integrate the City of Villages strategy and guide the provision of public facilities while accommodating planned growth. Policies within the Land Use Element in combination with other elements also protect coastal resources and ensure consistency with zoning regulations (i.e., Land Development Code).

The Land Use Element of the General Plan is largely seen as the structure and framework for developing community plans. When appropriate, policies call for community plans to further identify appropriate land uses to meet the goals set by the General Plan and City of Villages strategy. The policies also indicate that mixed-use areas, villages, and community-specific policies are developed with public input and involvement.

The Land Use Element contains five goals related to community planning. These are to provide:

- Community plans that are clearly established as essential components of the General Plan to provide focus upon community-specific issues.
- Community plans that are structurally consistent yet diverse in their presentation and refinement of city-wide policies to address specific community goals.
- Community plans that maintain or increase planned density of residential land uses in appropriate locations.
- Community plan updates that are accompanied by updated PFFPs.
- Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.

Community plans are important because they contain specific policies that protect community character. Future public and private development proposals would be evaluated for consistency with policies in the community plans. The specific policies in the Land Use Element that apply to the development of all community plans throughout the City are included in Table 5.1-3.

TABLE 5.1-3
LAND USE ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
LU-A.1(c)	Designate Neighborhood, Community, and Urban Village Centers, as appropriate, in community plans throughout the City, where consistent with public facilities adequacy and other goals of the General Plan.
LU-A.5	Conduct environmental review and focused study during the community plan update process, of potential village locations, with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design.
LU-A.7	Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.
LU-A.8	Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.
LU-B.1	Use the recommended Community Plan Designations identified on Table LU-4 so that over time, all community plans will use a common nomenclature to describe similar land uses and densities.
LU-B.2	Identify a more refined street system than is included in the General Plan Land Use and Streets Map through the community plan update and amendment process (see also Mobility Element, Section C).
LU-C.1	Establish each community plan as an essential and integral component of the City's General Plan with clear implementation recommendations and links to General Plan goals and policies. a. Develop community plan policies that implement citywide goals and address community or neighborhood-specific issues; such policies may be more detailed or restrictive than the General Plan as needed (see also LU-C.1.c. and LU-C.2.). b. Rely on community plans for site-specific land use and density designations and recommendations. c. Maintain consistency between community plans and the General Plan, as together they represent the City's comprehensive plan. In the event of an inconsistency between the General Plan and a community plan, action must be taken to either: (1) amend the community plan, or (2) amend the General Plan in a manner that is consistent with the General Plan's Guiding Principles.

TABLE 5.1-3
LAND USE ELEMENT POLICIES RELATED TO COMMUNITY PLANS
(continued)

Policy	Description
LU-C.2	Prepare community plans to address aspects of development that are specific to the community, including: distribution and arrangement of land uses (both public and private); the local street and transit network; location, prioritization, and the provision of public facilities; community and site-specific urban design guidelines; urban design guidelines addressing the public realm; community and site-specific recommendations to preserve and enhance natural and cultural resources; and coastal resource policies (when within the Coastal Zone). a. Apply land use designations at the parcel level to guide development within a community. 1. Include a variety of residential densities, including mixed use, to increase the amount of housing types and sizes and provide affordable housing opportunities. 2. Designate open space and evaluate publicly-owned land for future dedication and privately-owned lands for acquisition or protection through easements. 3. Evaluate employment land and designate according to its role in the community and in the region. 4. Designate land uses with careful consideration to hazard areas including areas affected by flooding and seismic risk as identified by Figure CE-5 Flood Hazard Areas and Figure PF-9 Geo-technical and Relative Risk Areas. b. Draft each community plan with achievable goals, and avoid creating a plan that is a "wish list" or a vague view of the future. c. Provide plan policies and land use maps that are detailed enough to provide the foundation for fair and predictable land use planning. d. Provide detailed, site-specific recommendations for village sites. e. Recommend appropriate implementation mechanisms to efficiently implement General Plan and community plan recommendations. f. Establish a mobility network to effectively move workers and residents. g. Update the applicable public facilities financing plan to assure that public facility demands are adjusted to account for changes in future land use and for updated costs associated with new public facilities.
LU-C.3	Maintain or increase the City's supply of land designated for various residential densities as community plans are prepared, updated, or amended.
LU-C.4	Ensure efficient use of remaining land available for residential development and redevelopment by requiring that new development meet the density minimums of applicable plan designations.

TABLE 5.1-3
LAND USE ELEMENT POLICIES RELATED TO COMMUNITY PLANS
(continued)

Policy	Description
LU-C.5	Draft, update, and adopt community plans with a schedule that ensures that a community's land use policies are up-to-date and relevant, and that implementation can be achieved. a. Utilize the recognized community planning group meeting as the primary vehicle to ensure public participation. b. Include all community residents, property owners, business owners, civic groups, agencies, and City departments who wish to participate in both land use and public facilities planning and implementing the community vision. c. Concurrently update plans of contiguous planning areas in order to comprehensively address common opportunities such as open space systems or the provision of public facilities and common constraints such as traffic congestion.
LU-C.6	Review existing and apply new zoning at the time of a community plan update to assure that revised land use designations or newly-applicable policies can be implemented through appropriate zones and development regulations (see also LU Section F).

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Village Propensity. The Village Propensity Map in the Land Use Element of the General Plan (see General Plan Figure LU-1) illustrates existing areas that already exhibit village characteristics and areas that may have a propensity to develop as village areas. General Plan Figure LU-1 indicates that limited areas in the western portion of the CPU possess a low to moderate potential for village development, as described in the General Plan. Most of the CPU area, due to the high concentration of industrial uses, has very low potential for village development. Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; and existing or an identified funding source for transit service, community character, and environmental constraints (City of San Diego 2008a).

Village propensity also takes into consideration the location of parks, fire stations, and transit routes.

Environmental Protection/Environmental Justice. The General Plan Land Use Element provides direction for preparation of community plans and areas of zoning and policy consistency, plan amendment processes, coastal planning, balanced communities, equitable development, and environmental justice. The EPA defines Environmental Justice as fair treatment and meaningful involvement of all peoples, regardless of race, color, national origin, or income, with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. The City of Villages strategy and emphasis on transit system improvements, transit-oriented

development, and the citywide prioritization and provision of public facilities in underserved neighborhoods is consistent with environmental justice goals.

Specific policies for environmental justice from the General Plan Land Use Element as they relate to environmental protection are presented in Table 5.1-4.

TABLE 5.1-4
LAND USE ELEMENT POLICIES RELATED TO ENVIRONMENTAL PROTECTION

Policy	Description
LU-I.12	Ensure environmental protection that does not unfairly burden or omit any one geographic or socioeconomic sector of the City.
LU-1.13	Eliminate disproportionate environmental burdens and pollution experienced by historically disadvantaged communities through adherence to the environmental justice policies in Section I and the following: a. Apply zoning designations that separate industrial and sensitive receptor uses as presented on LU Table 4. b. Preserve prime industrial land for the relocation of industrial uses out of residential areas (see also Economic Prosperity Element, Section A). c. Promote environmental education including principles and issues of environmental justice (see also Conservation Element, Section N). d. Use sustainable development practices (see also Conservation Element, Section A).
LU-I.14	As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc.
LU-I.15	Plan for the equal distribution of potentially hazardous and/or undesirable, yet necessary, land uses, public facilities and services, and businesses to avoid over concentration in any one geographic area, community, or neighborhood.
LU-I.16	Ensure the provision of noise abatement and control policies that do not disenfranchise, or provide special treatment of, any particular group, location of concern, or economic status.

SOURCE: City of San Diego General Plan Land Use Element 2008.

Mobility Element

The Mobility Element contains policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system. The specific policies in the Mobility Element that apply to the development of all community plans throughout the city are included in Table 5.1-5.

TABLE 5.1-5
MOBILITY ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
ME-B.9	Make transit planning an integral component of long range planning documents and the development review process. a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment. f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.
ME-C.1	Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans. a. Protect and seek dedication or reservation of right-of-way for planned transportation facilities through the planning and development review process. b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time. c. Identify streets or street segments where special design treatments are desired to achieve community goals. d. Identify streets or street segments, if any, where higher levels of vehicle congestion are acceptable in order to achieve vibrant community centers, increase transit-orientation, preserve or create streetscape character, or support other community-specific objectives. e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Urban Design Element

Urban Design Element policies call for development that respects the City's natural setting; enhances the distinctiveness of neighborhoods; strengthens the natural and built linkages; and creates mixed-use, walkable villages throughout the City. The Urban Design Element addresses urban form and design through policies relative to San

Diego's natural environment that work to preserve open space systems and target new growth into compact villages.

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to: fire-rescue; police; wastewater collection and treatment; storm water infrastructure; water supply and distribution; waste management; libraries; schools; public utilities; and disaster preparedness.

Recreation Element

The goals and policies of the Recreation Element have been developed to take advantage of the City's natural environment and resources, to build upon existing recreation facilities and services, to help achieve an equitable balance of recreational resources, and to adapt to future recreation needs. The Recreation Element contains policies to address the challenge of meeting the public's park and recreational needs; the inequitable distribution of parks citywide, especially acute in the older, urbanized communities; and to work toward achieving a sustainable, accessible, and diverse park and recreation system. The Recreation Element also addresses alternative methods, or "equivalencies," to achieve citywide equity where constraints make meeting City guidelines for public parks infeasible, or to satisfy community-specific needs and demands. The specific policies in the Recreation Element that apply to the development of all community plans throughout the city are included in Table 5.1-6.

TABLE 5.1-6
RECREATION ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
RE-A.2	Use community plan updates to further refine citywide park and recreation land use policies consistent with the Parks Master Plan. a. In the absence of a Parks Master Plan, utilize community plans to guide park and recreation facilities acquisition and development citywide. b. Coordinate public facilities financing plans with community plan and the Parks Master Plan recommendations to properly fund needed park and recreation facilities throughout the City. c. Identify the location of population-based parks when updating community plans so they are accessible and centrally located to most users, unless a community benefit can be derived by taking advantage of unique opportunities, such as adjacency to open space, park linkages, desirable views, etc.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008

Conservation Element

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include, but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The specific policies in the Conservation Element that apply to the development of all community plans throughout the city are included in Table 5.1-7.

TABLE 5.1-7
CONSERVATION ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
CE-C.2	Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans (see also Land Use Element, Policy LU-E-1).
CE-J.2	Include community street tree master plans in community plans. a. Prioritize community streets for street tree programs. b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form. c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.
CE-J.3	Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Historic Preservation Element

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. The specific policies in the Historic Preservation Element that apply to the development of all community plans throughout the City are included in Table 5.1-8.

TABLE 5.1-8
HISTORIC PRESERVATION ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
HP-A.2	Fully integrate the consideration of historical and cultural resources in the larger land use planning process. a. Promote early conflict resolution between the preservation of historical resources and alternative land uses. b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with property owners, community and historic preservation groups, land developers, Native Americans, and the building industry. c. Include historic preservation concepts and identification of historic buildings, structures, objects, site, neighborhoods, and non-residential historical resources in the community plan update process. d. Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to complement community character. e. Make the results of historical and cultural resources planning efforts available to planning agencies, the public and other interested parties to the extent legally permissible.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Noise Element

The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The specific policies in the Noise Element that apply to the development of all community plans throughout the City are included in Table 5.1-9.

TABLE 5.1-9
NOISE ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
NE-A.1	Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.
NE-A.2	Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
NE-A.3	Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
NE-A.5	Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.
NE-B.1	Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.
NE-B.5	Designate local truck routes to reduce truck traffic in noise-sensitive land use areas.
NE-C.1	Use site planning to help minimize exposure of noise-sensitive uses to rail corridor and trolley line noise.
NE-D.1	Encourage noise-compatible land use within airport influence areas in accordance with federal and state noise standards and guidelines.
NE-D.2	Limit future residential uses within airport influence areas to the 65 dBA CNEL airport noise contour, except for multiple-unit, mixed-use, and live work residential uses within the San Diego International Airport influence area in areas with existing residential uses and where a community plan and the Airport Land Use Compatibility Plan allow future residential uses.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Housing Element

The separately adopted 2013–2020 Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group.

Economic Prosperity Element

The intent of the Economic Prosperity Element is ". . . to improve the economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retail and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities" (City of San Diego 2008a).

The Economic Prosperity Element addresses the community planning process and the distribution of land uses. This element applies to the CPU area, especially for the goals and policies related to employment opportunities from infill development near transit and village-type development, small business enterprises, and the retention of industrial uses. Applicable General Plan policies from this element are listed in Table 5.1-10.

TABLE 5.1-10
ECONOMIC PROSPERITY ELEMENT POLICIES RELATED TO COMMUNITY PLANS

Policy	Description
EP-A.1	Protect base sector uses that provide quality job opportunities including middle-income jobs; provide for secondary employment and supporting uses; and maintain areas where smaller emerging industrial uses can locate in a multi-tenant setting. When updating community plans or considering plan amendments, the industrial land use designations contained in the Land Use and Community Planning Element should be appropriately applied to protect viable sites for base sector and related employment uses.
EP-A.4	Include base sector uses appropriate to an office setting in Urban Village and Community Village Centers.
EP-A.5	Consider the redesignation of non-industrial properties to industrial use where land use conflicts can be minimized. Evaluate the extent to which the proposed designation and subsequent industrial development would: • Accommodate the expansion of existing industrial uses to facilitate their retention in the area in which they are located. • Not intrude into existing residential neighborhoods or disrupt existing commercial activities and other uses. • Mitigate any environmental impacts (traffic, noise, lighting, air pollution, and odor) to adjacent land. • Be adequately served by existing and planned infrastructure.
EP-A.6	Provide for the establishment or retention of non-base sector employment uses to serve base sector industries and community needs and encourage the development of small businesses. To the extent possible, consider locating these types of employment uses near housing. When updating community plans or considering plan amendments, land use designations contained in the Land Use and Community Planning Element should be appropriately applied to provide for non-base sector employment uses.
EP-A.7	Increase the allowable intensity of employment uses in Subregional Employment Areas and Urban Village Centers where transportation and transit infrastructure exist. The role of transit and other alternative modes of transportation on development project review are further specified in the Mobility Element, Policies ME-C.8 through ME-C.10.
EP-A.12	Protect Prime Industrial Land as shown on the Industrial and Prime Industrial Land Map, Figure EP-1. As community plans are updated, the applicability of the Prime Industrial Land Map will be revisited and changes considered. a. Amend the boundaries of Figure EP-1 if community plan updates or community plan amendments lead to an addition of Prime Industrial Lands, or conversely, a conversion of Prime Industrial Land uses to other uses that would necessitate the removal of properties from the Prime Industrial Land identification. b. Amend the boundaries of Figure EP-1 if community plan updates or community plan amendments/rezones lead to a collocation (the geographic integration of residential uses and other non-industrial uses into industrial uses located on the same premises) of uses. c. Justification for a land use change must be supported by an evaluation of the prime industrial land criteria in Appendix C, EP-1, the collocation/conversion suitability factors in Appendix C, EP-2, and the potential contribution of the area to the local and regional economy.

TABLE 5.1-10
ECONOMIC PROSPERITY ELEMENT POLICIES RELATED TO COMMUNITY PLANS
(continued)

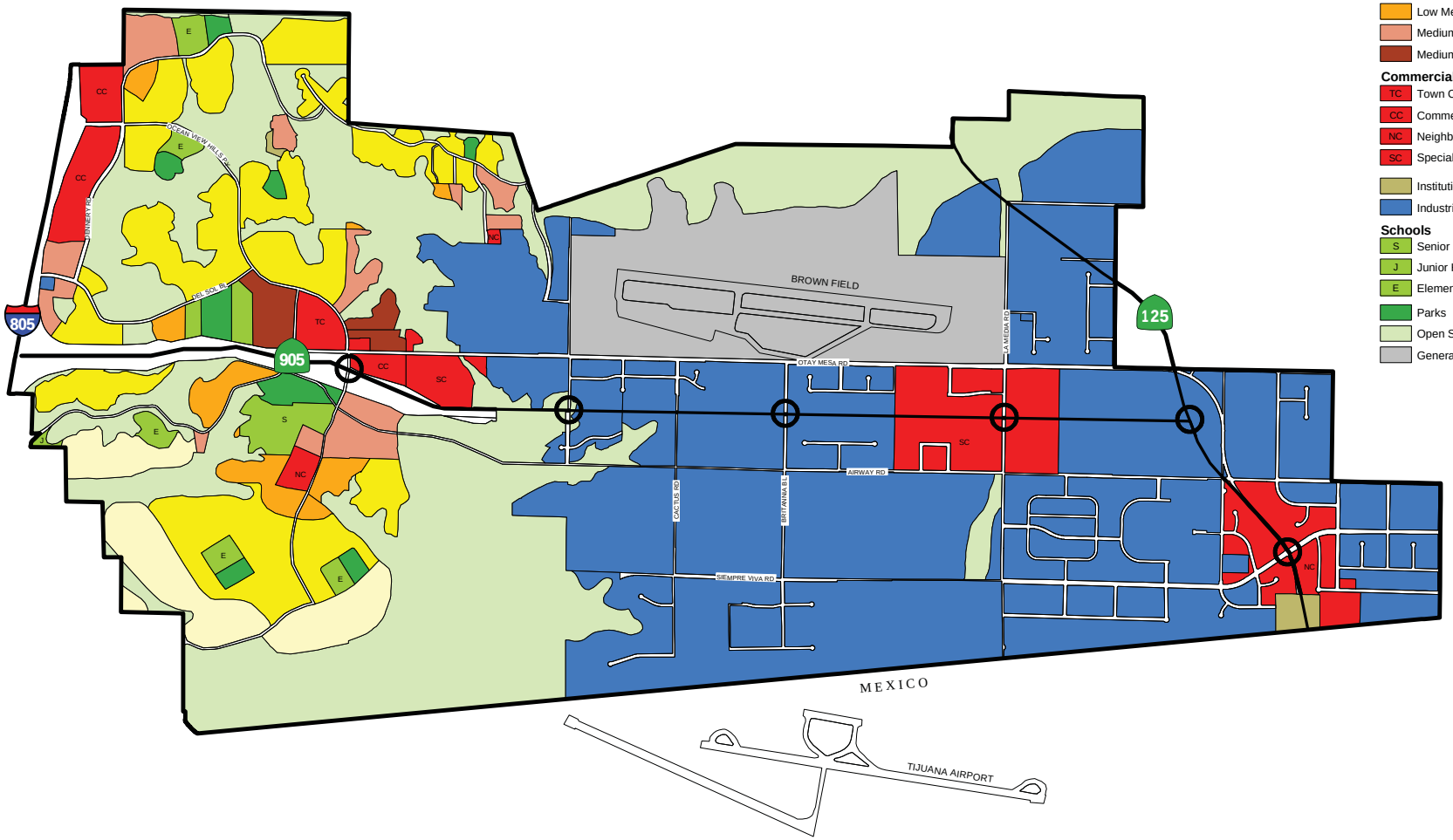
Policy	Description
EP-A.13	In areas identified as Prime Industrial Land as shown on Figure EP-1, do not permit discretionary use permits for public assembly or sensitive receptor land uses.
EP-A.14	In areas identified as Prime Industrial Land as shown on Figure EP-1, child care facilities for employees' children, as an ancillary use to industrial uses on a site, may be considered and allowed when they: are sited at a demonstrably adequate distance from the property line, so as not to limit the current or future operations of any adjacent industrially-designated property; can assure that health and safety requirements are met in compliance with required permits; and are not precluded by the applicable Airport Land Use Compatibility Plan.
EP-A.15	The identification of Prime Industrial Land on any property does not preclude the development or redevelopment of such property pursuant to the development regulations and permitted uses of the existing zone and community plan designation, nor does it limit the application of any of the Industrial Employment recommended community plan land use designations in Table LU-4, provided that residential use is not included.
EP-A.16	In industrial areas not identified as Prime Industrial Lands on Figure EP-1, the redesignation of industrial lands to non-industrial uses should evaluate the Area Characteristics factor in Appendix C, EP-2 to ensure that other viable industrial areas are protected.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

Availability and retention of industrial uses is an important part of the Economic Prosperity Element goals and strategies as well as the community plans. Policies EP-A.12 through A.16 refer to the General Plan Figure EP-1 (Industrial and Prime Industrial Land Identification), which displays the prime industrial land throughout the City, including the CPU area. The areas identified as prime industrial lands support "export-oriented base sector activities such as warehouse distribution, heavy or light manufacturing, research and development uses…that provide a significant benefit to the regional economy" (City of San Diego 2008a).

As shown on Figure 5.1-2, industrial lands are designated primarily in the eastern portion of the CPU area and adjacent to Brown Field. Appendix C of the General Plan contains a list of factors to consider when a change in land use is proposed. Important factors when considering the suitability of a site for industrial use include: whether or not the community plan designates the land for industrial uses, the presence of physical characteristics which would facilitate modern industrial development, and the balance of sensitive receptor land uses. The table of Collocation/Conversion Suitability Factors from Appendix C is replicated as Table 5.1-11 of this EIR.

Map Source: City of San Diego Planning Department



No Scale

FIGURE 5.1-2

Adopted OMCP Land Use Map

TABLE 5.1-11
COLLOCATION/CONVERSION SUITABILITY FACTORS

Factor	Description
Area Characteristics	The amount of office and commercial development in the area. The significance of encroachment of the non-industrial uses which has already occurred in the area. The area's attractiveness to manufacturing, research and development, wholesale distribution, and warehousing uses, based on a variety of factors including: physical site characteristics, parcel size, parcel configuration, surrounding development patterns, transportation access, and long-term market trends.
Transit Availability	The area is located within one-third mile of existing or planned public transit. The project proponent's ability to provide or subsidize transit services to the project, if public transit service is not planned or is inadequate.
Impact on Prime Industrial Lands	The location of the proposed project adjacent to prime industrial lands and the impact of the proposed project utilization of the prime industrial lands for industrial purposes.
Significance of Residential/Employment Component	The significance of the proposed residential density to justify a change in land use. If residential is proposed on the same site, the amount of employment space on the site is to be retained.
Residential Support Facilities	The presence of public and commercial facilities generally associated with residential neighborhoods in close proximity to the area, such as recreational facilities, grocery stores, and schools.
Airport Land Use Compatibility	The location of the site in the airport influence area where incompatibilities may result due to adopted Airport Land Use Compatibility Plan policies, Air Installation Compatibility Use Zone Study recommendations, and restrictive use easements.
Public Health	The location of the site in an employment area where significant incompatibilities may result regarding truck traffic, odors, noise, safety, and other external environmental effects.
Public Facilities	The availability of facilities to serve the residential units. Provide public facilities on-site wherever feasible.
Separation of Uses	The adequacy of the separation between industrial and residential properties with regard to hazardous or toxic air contaminants or hazardous or toxic substances. Determine if there are any sources of toxic or hazardous air contaminants, or toxic or hazardous substances, within a quarter mile of the property between proposed residential or other sensitive receptor land uses and proposed properties where such contaminants or substances are located. If so, an adequate distance separation shall be determined on a case-by-case basis based on an approved study submitted by the applicant to the City and appropriate regulatory agencies. If no study is completed, provide a 1000-ft. minimum distance separation between property lines. Uses which are not sensitive receptor land uses, such as most commercial and business offices, retail uses, parking, open space, and public rights-of way can locate between the properties within the separation area.

SOURCE: City of San Diego General Plan Appendix C 2008.

Otay Mesa is also designated as a Subregional Employment Area in the General Plan, Appendix C, Figure EP-2, and guidelines are included in Appendix C, EP-3. As detailed in the appendix, the proximity to Mexico and flat topography make Otay Mesa an ideal location for distribution centers that conduct business between the United States and Mexico. The following is an excerpt from the appendix related to land use designations and permitting:

> Most of the land in Otay Mesa has been designated for industrial uses and utilizes special zoning to provide for purely industrial uses, with discrete areas reserved to support commercial services and limited retail uses. A land use designation permitting heavy industrial uses should be applied in portions of the community to prevent encroachment by non-industrial uses. Adequate separation should also be provided if residential uses are located in close proximity. Support of infrastructure development and preservation of areas for primarily industrial uses that support manufacturing and international trade activities are essential to provide middle-income job opportunities and contribute to the growth of the City's overall economic base.

Some non-Mexico-related manufacturers and distributors have begun relocating to Otay Mesa from other parts of Southern California due to the availability of large continuous parcels, land costs and industrial lease rates. Most structures in this area are modern single-story concrete "tilt-up": industrial buildings with loading docks.

Collocation/Buffer Strategy

General Plan Land Use Policy LU-1.14 focuses on separating sensitive receptors from industrial uses. The Economic Prosperity Element includes policies EP-A.1 through EP-A.20 which address the means by which the City would minimize land use conflicts and preserve the most important types of industrial land, or prime industrial land, from conflict with residential, public assembly, and other sensitive receptor land uses. The General Plan provides for collocation of residential and industrial uses as a means for locating workforce-housing opportunities near job centers provided land use conflicts are minimized or avoided. In addition, Table 5.1-11 of this EIR presents the criteria for determining whether a use is suitable for collocation/conversion.

b. Adopted Otay Mesa Community Plan

The CPU area is one of more than 50 community planning areas within the City. The community plan for a given area outlines the goals, objectives, and policies for future land use development within that community. Community plans work to implement the General Plan and, as such, are written to be consistent with the policies and recommendations of the General Plan and other citywide policies. Land use mapping for

the City is accomplished at the community plan level, using land use categories established and defined within the General Plan Land Use Element.

Community plans provide guidance for public and private development proposals. However, community plans do not contain regulatory requirements. Regulatory requirements are contained in the LDC, as explained in Section 5.1.1.2.c, below.

Each community plan must be in harmony with other community plan documents, the General Plan, and City policies. Community plan documents include sections addressing land use, transportation, urban design, public facilities, services, economic development, and other issues important to the community. Plans are tailored to address the needs of each community with specific recommendations and goals designed to reflect the unique issues and concerns pertinent to the individual community. Community plans complement General Plan policies by designating appropriate areas for village development and specific land uses and selecting sites for public facilities, among other functions.

The adopted Otay Mesa Community Plan (1981), as amended, addresses the development of land within Otay Mesa, and provides more detailed land use, design, roadway, and implementation information than what is found at the General Plan level. To achieve the goal of "a balanced land use concept," the adopted Otay Mesa Community Plan promotes:

- development of a relatively self-contained community,
- a 3,500-acre industrial park including a foreign trade zone,
- coordination of the proposed second international crossing with local, state, and federal agencies and plans of the Mexican government, and
- phased annexation of the unincorporated County area east of the Otay Mesa Community Plan area to the City of San Diego.

Specific goals, objectives, and policies to implement the adopted Otay Mesa Community Plan are contained in its elements: Land Use, Industrial, Community Environmental and Design, Open Space, Public Facilities, and Social Environment.

Figure 5.1-2 illustrates the adopted Otay Mesa Community Plan land use designations, modified to reflect the incorporation of MHPA lands in 1997. The amendment of the Otay Mesa Community Plan to designate over 2,000 acres as MHPA open space resulted in the loss of previously designated residential areas. Table 5.1-12 provides a tabulation of acreage for each land use category and projected resident population at buildout for the adopted Otay Mesa Community Plan, as amended. This table reflects the adopted Otay Mesa Community Plan land use designations for the CPU area, and does not include the larger study area identified in the adopted community plan and EIR, which included a potential annexation area to the east.

TABLE 5.1-12
ADOPTED OTAY MESA COMMUNITY PLAN
DESIGNATED LAND USES

Population	45,324	
Land Use Designations		Coverage
Residential:	1,269 ac	
Single-family detached	4,800 du	13%
Multi-family attached	7,600 du	
Total Residential dus	12,400 du	
Commercial	452 ac	5%
Industrial	2,839 ac	31%
Institutional	1,027 ac	11%
Parks	64 ac	1%
Open Space	2,570 ac	27%
Right-of-Way	1,098 ac	12%
TOTAL	9,319 ac	100%

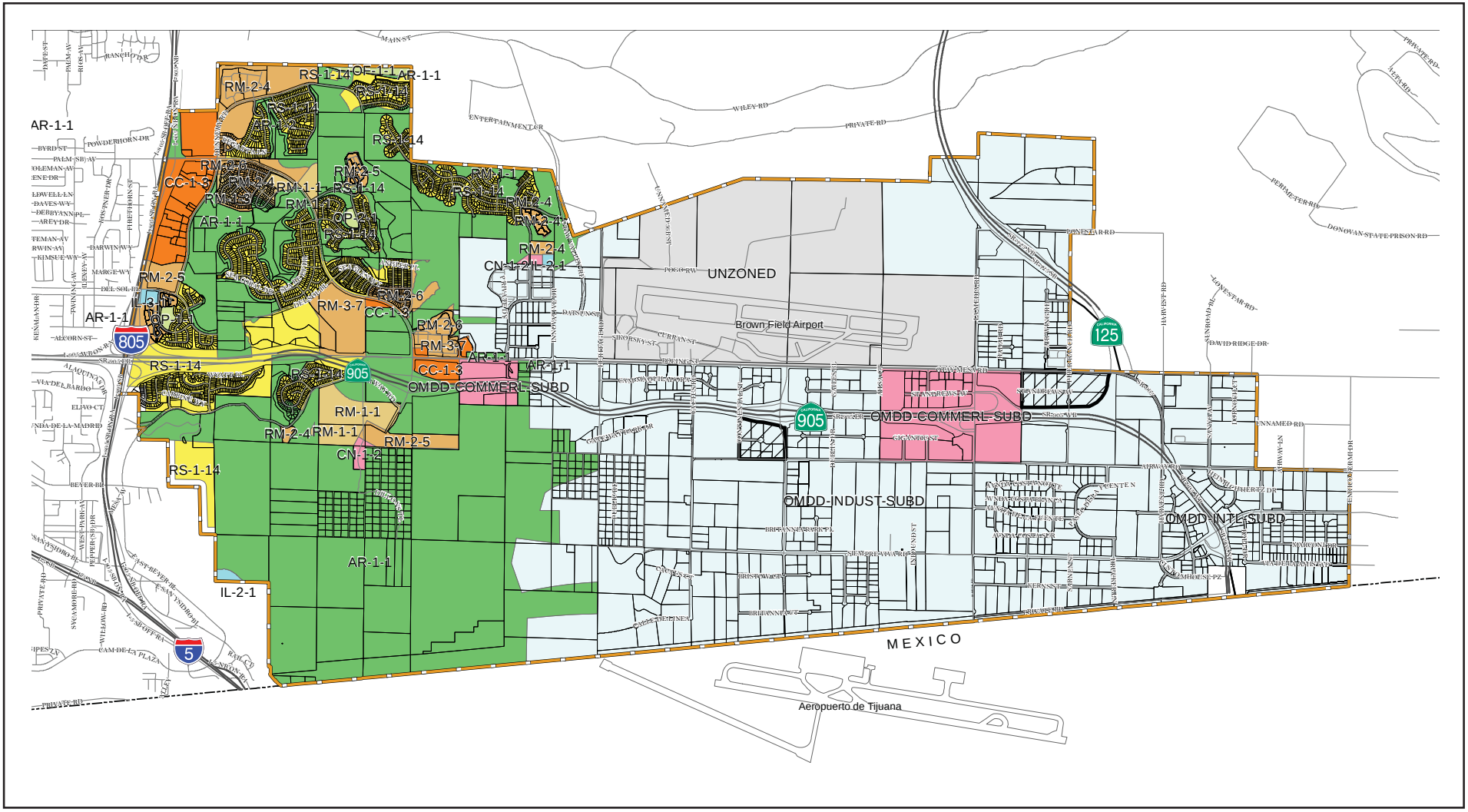
SOURCE: OMCPU, April 2011 Draft, Table 2-1
ac = acres; du = dwelling units

c. Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones and the planned district ordinances that specify permitted land use; development standards, such as density, floor-area ratio (FAR), and other requirements for given zoning classifications; overlay zones, and other supplemental regulations that provide additional development requirements.

Historically, the western portion of Otay Mesa was zoned agricultural, with residential zoning introduced as the Precise Plans and subdivisions were adopted and implemented. Residential zoning in the CPU area is currently concentrated in the western third of the CPU area and consists of a mixture of Citywide single-family and multi-family zones. Remaining agricultural zoning within the CPU area occurs generally within the northwestern canyon areas, as well as the southwestern precise planning area and canyons. Except for Brown Field, which is unzoned, the eastern two-thirds of the CPU area is zoned and governed by the OMDD as discussed below. Figure 5.1-3 shows existing zoning for the CPU area.

Map Source: City of San Diego



No Scale

Community Plan Boundary

Parcels

FIGURE 5.1-3

Existing Zoning

Otay Mesa Development District

The OMDD is one of the Planned District Ordinances (PDO) within the LDC. PDOs provide tailored zoning, used in conjunction with the LDC, for specified areas of the City. The City proposes to rescind the OMDD and replace it with citywide zoning as part of the community plan update process.

The area regulated by the OMDD is the City's largest planned industrial area with proximity and accessibility to Mexico. The OMDD regulates the use, intensity, and design of the primarily industrial 3,371-acre area, which includes a commercial subdistrict (240 acres) and a large border station mixed-use subdistrict (450 acres). Figure 5.1-3 shows the location and extent of the OMDD and subdistricts. As shown in Figure 5.1-3, the OMDD overlays a large portion of the CPU area, covering the entire eastern two-thirds of the CPU area, excluding Brown Field.

The OMDD provides for a full range of industrial uses emphasizing base sector manufacturing including wholesaling and distribution, assembly operations, and necessary support services. The intent of the OMDD is to expedite the processing of development permit applications in order to encourage the provision of that full range of industrial uses, while also including wholesaling and distribution, and assembly operations. It is also the intent of the OMDD to provide the necessary facilities, services, and commercial uses that complement the industrial uses and the Otay Mesa border crossing. The OMDD also provides for, agricultural activities as an interim use.

An OMDD permit is required in certain cases. The following is a list of projects that would require an OMDD Permit in accordance with Section 1517.0202(b):

- Any project that uses transfer of development rights and any project that uses acquired development rights.
- Any project within the Canyon and Hillside Subdistrict (Section 1517.0303).
- Any project which deviates from the regulations of the OMDD.
- Any project which includes a hotel or motel.
- Any project for which a tentative map has not been approved subsequent to March 14, 1985 (Otay Mesa reorganization).

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (LDC Sections 143.0101 through 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

regulations are designed to ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats.

The ESL Regulations contain development regulations that are applied through a Site Development Permit when there is a potential for impacts to environmentally sensitive resources. For areas outside of the MHPA (see below), the ESL provides no limit on development encroachment into sensitive biological resources, with the exception of wetlands (including vernal pools) and listed non-covered species habitat and narrow endemic species. Development of steep hillsides outside of the MHPA is only allowed when necessary to achieve a maximum development area of 25 percent of the premises. Development encroachment into steep hillsides and sensitive biological resources within the MHPA is restricted. Development within the MHPA beyond 25 percent of the least environmentally sensitive areas is not allowed; thus, such proposed development would be required to process a MHPA Boundary Line Adjustment. If development does not comply with the Hillside encroachment allowances, a deviation would be required and granted by the City if certain findings can be made.

Within the CPU area, ESL resources include sensitive species and habitats, vernal pools and other wetlands, and steep hillsides. Many of the ESL resources are within the existing designated MHPA and are thus restricted from development encroachment of more than 25% of the least sensitive areas. Compliance of the CPU with the ESL Regulations is discussed in Issue 3, Section 5.1.5.

Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (HRR) (LDC Sections 143.0201 through 143.0280) is to protect, preserve, and, where damaged, restore the historical resources of San Diego. Historical resources include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties (TCPs). These regulations are intended to protect historical resources quality, and to protect the educational, cultural, economic, and general welfare of the public, while maintaining sound historical preservation principles and the rights of property owners.

As discussed in Section 5.5 of this PEIR, Historical Resources, several known historical resources exist within the CPU area and are primarily concentrated within the Brown Field Historic District just south of the landing strip and the surrounding areas outside of Brown Field. The potential for unidentified historical resources also exists within other portions of the CPU area. Compliance of the CPU with the City's HRR is discussed below in Issue 3, Section 5.1.5.

Brush Management Regulations

The City's Brush Management Regulations (LDC Section §142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations are intended to limit hazardous wildland fire situations by requiring the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant maintenance in specific zones, and, as discussed further in Issue 3 Section 5.1.5 below, are implemented at the project level through the grading and building permit process.

d. Brown Field Airport Land Use Compatibility Plan

The San Diego County Regional Airport Authority was established by state law to operate the San Diego International Airport and address the region's long-term air transportation needs, and as such, comprises the Airport Land Use Commission (ALUC) for all the airports in San Diego County, including Brown Field. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses.

A Comprehensive Land Use Plan (CLUP) was adopted for Brown Field in 1981. This CLUP was subsequently changed to an ALUCP in October 2004 and amended in January 2010. State law requires the City to amend its General Plan and community plans within 180 days after the ALUC adopts a new ALUCP to make the land use plans consistent with the ALUCP. The City subsequently adopted SDMC Chapter 13, Article 2, Division 15, Airport Land Use Compatibility Overlay Zone. The Brown Field ALUCP is designed to safeguard the general welfare of persons within the vicinity of the airport and the public in general. Development in the vicinity of the airport must be consistent with the ALUCP, and the Airport Authority has the responsibility to review certain land use actions for compliance with the criteria and policies set forth in the ALUCP including adoption or amendments to general plans, specific plans, and zoning ordinances. The ALUCP contains compatibility policies and criteria and ALUC review procedures addressing the following types of compatibility concerns: noise, overflight, safety, and airspace protection. To facilitate the application of the compatibility policies and criteria and ALUC review procedures, the ALUCP identifies the Airport Influence Area (AIA), the noise contours to be used for planning purposes, the airport safety zones, and the airspace protection surfaces.

The Brown Field ALUCP is based on the Brown Field Master Plan that reflects the anticipated growth of the airport during the next 20 years. The ALUCP differs from the master plan in that the focus of the ALUCP is on the land around the airport while the focus of the airport master plan is on property within the airport boundary. In addition, primary responsibility for adoption of a ALUCP rests with the ALUC, while responsibility for adoption of the Brown Field Master Plan belongs to the City.

Figure 5.1-4 shows the ALUCP projected noise contours, expressed in community noise equivalency levels (CNELs). The Aeronautics Division of Caltrans has determined that a 65 decibel CNEL is the level at which residential land use becomes incompatible in relation to aircraft operations. As shown in Figure 5.1-4, the 65 CNEL contour encompasses the area surrounding the runway corridor, and remains largely within the Brown Field property. It extends beyond the Brown Field property at both ends of the runway, onto land designed by the adopted community plan as "General Aviation" or "Industrial".

The AIA, shown in Figure 5.1-5, encompasses much of the CPU area. The AIA is the area in which current or future airport-related noise, overflight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. The City, through its community planning process and zoning ordinance, retains land use control in the AIA.

To preclude incompatible development from intruding into areas of significant risk resulting from aircraft takeoff and landing patterns, the ALUCP identifies areas of significant risk as "Safety Zones." The Safety Zones for Brown Field are located adjacent to the ends of the runway's primary surfaces, over which all aircraft using the airport must pass on either arrival or departure. These areas are shown in Figure 5.1-6. The Safety Zones are used for evaluating safety compatibility for new development.

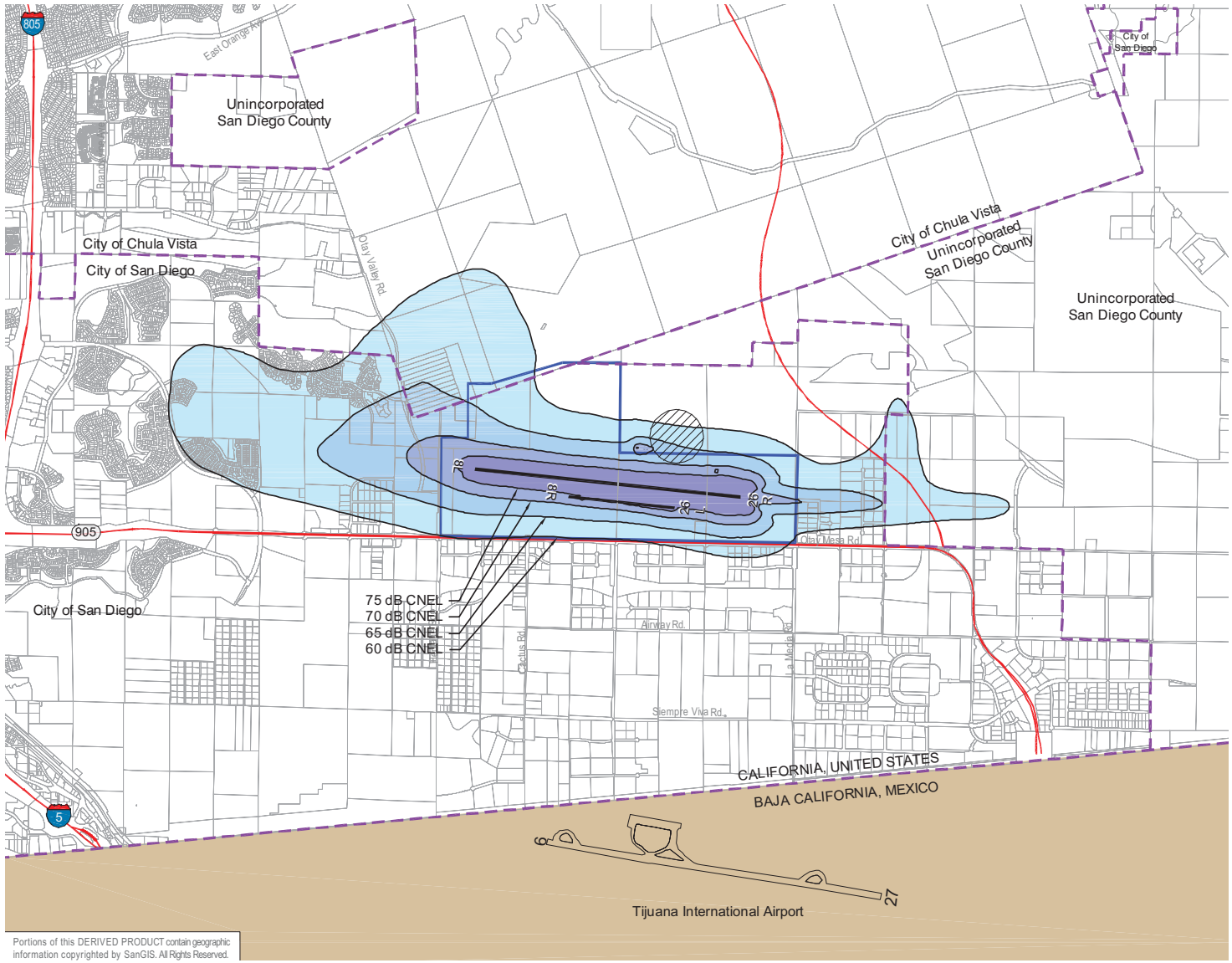
e. MSCP

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

MSCP Subarea Plan

The City of San Diego's MSCP Subarea Plan was approved in March 1997, and provides a process for the issuance of incidental take permits (ITP) under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning (NCCP) Act. The primary goal of the City's MSCP Subarea Plan is to conserve viable populations of sensitive species and regional biodiversity while allowing for reasonable economic growth. To carry out this goal, the City's MSCP Subarea Plan establishes a 52,727-acre area in which a permanent MSCP preserve, known as the MHPA, is assembled. For parcels 100% within the MHPA, development or other discretionary actions are allowed in the least environmentally sensitive 25 percent of the property. If more developable area is desired, the applicant may request a MHPA boundary line adjustment without the need to amend the City's MSCP Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition into the MHPA must meet

Map Source: Airport Landuse Commision, San Diego County



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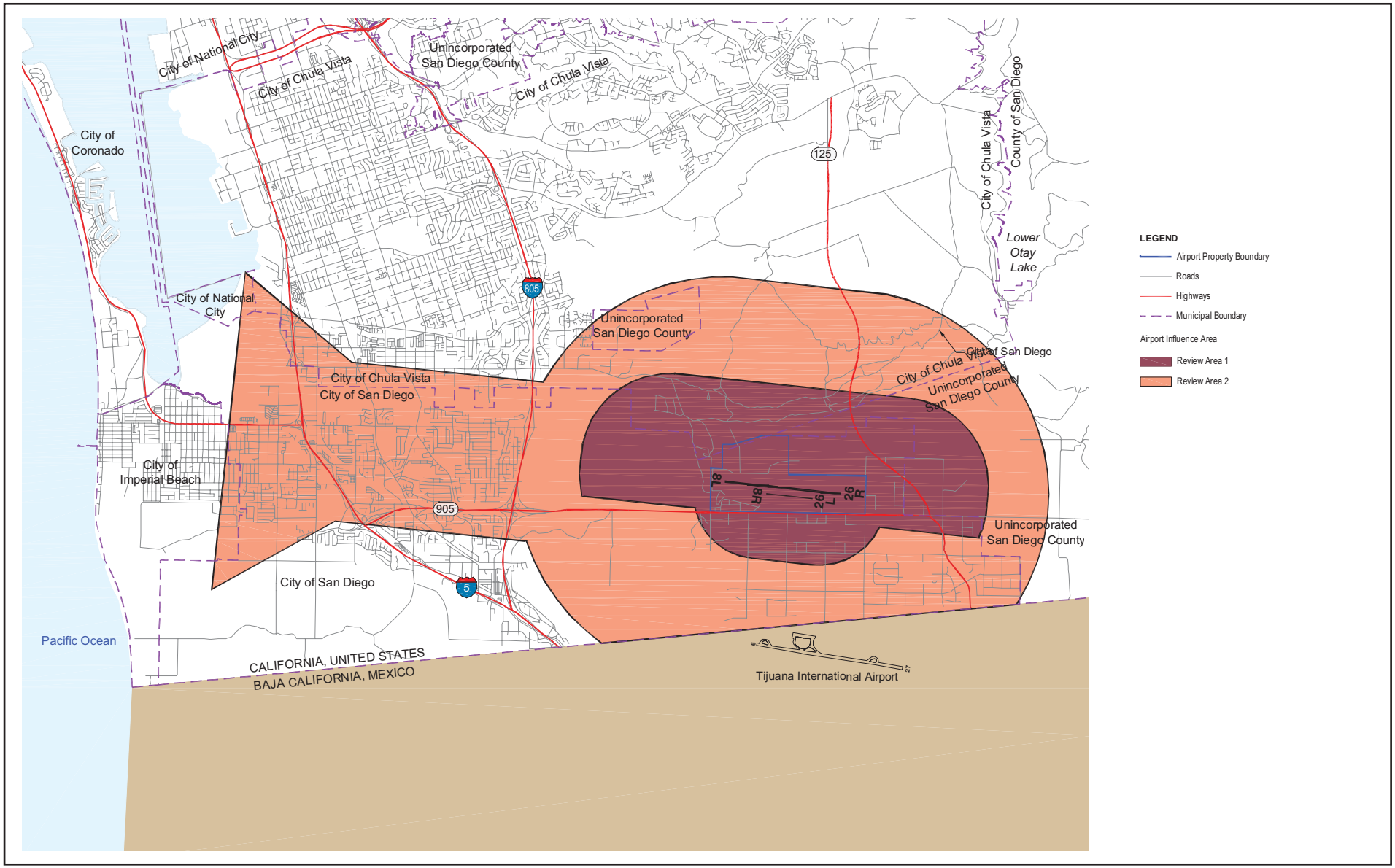
No Scale

FIGURE 5.1-4

Brown Field Noise Contours

Map Source: Airport Landuse Commision, San Diego County

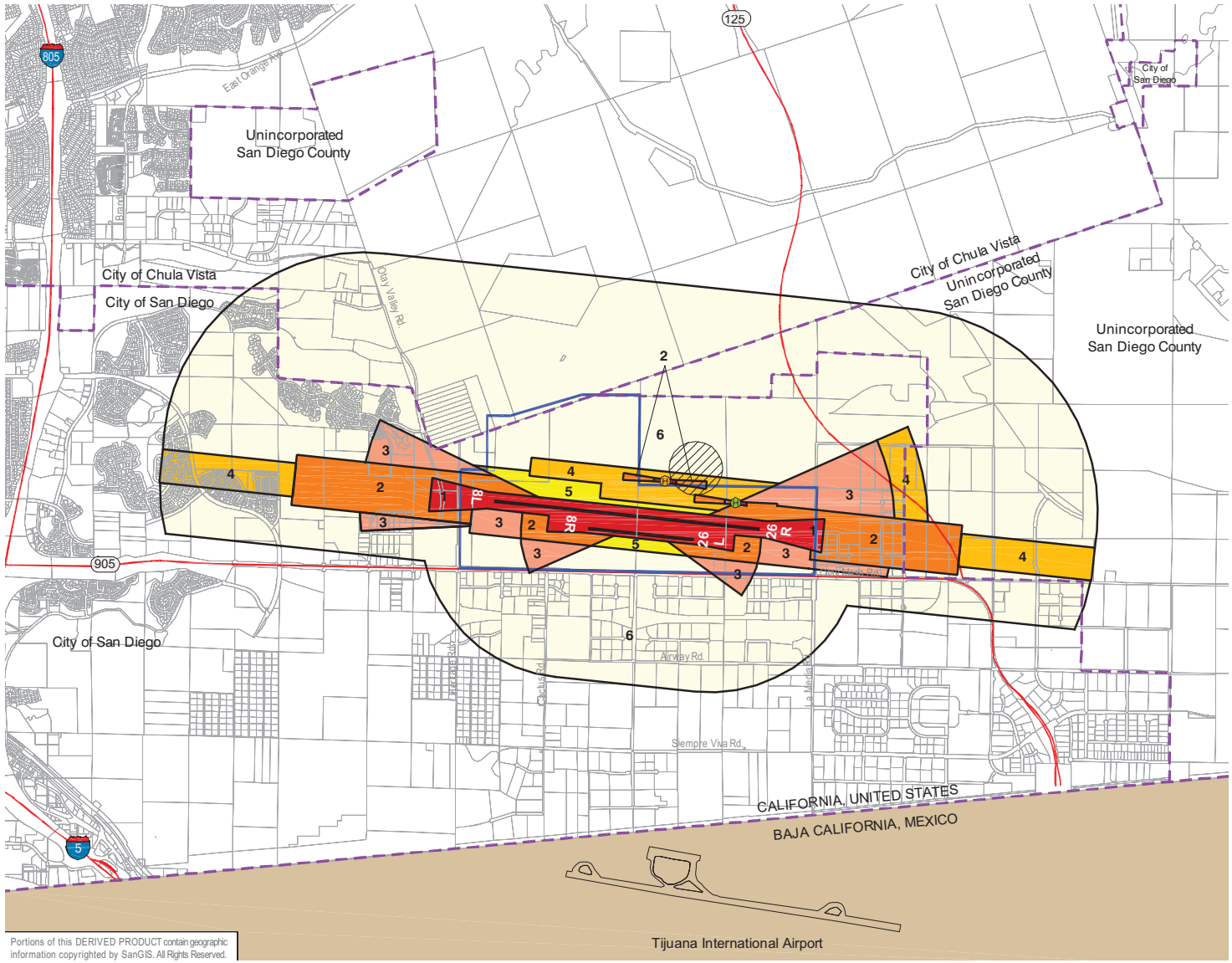


No Scale

FIGURE 5.1-5

Brown Field AIA

Map Source: Airport Landuse Commision, San Diego County



No Scale

FIGURE 5.1-6

Brown Field Safety Zones

the six functional equivalency criteria set forth in Chapter 5.4.2 of the Final MSCP Plan (August 1998). Essentially, these require that the land to be taken out of the MHPA be replaced with land of at least equal if not more valuable habitat. The adjustment must be approved by the USFWS and the CDFW (Wildlife Agencies).

A MHPA Boundary Line Correction within the south central CPU area was approved by the City and Wildlife Agencies on March 13, 2013. Due to a mapping registration error, the MHPA was mapped over 3.7 acres of existing development permitted as part of the International Business Center Project (EQD No. 86-0535) which was approved in the late 1980s. The MHPA boundary was shifted to the south in order to remove the approved developed area and to add the 10.8 acres in Wruck Canyon that had been conserved as part of the International Business Center Project. The correction resulted in a net gain of 7.1 acres within the MHPA.

MHPA Land Use Adjacency Guidelines

The City's MSCP Subarea Plan additionally provides MHPA Land Use Adjacency Guidelines which aim to avoid or reduce significant indirect impacts from adjacent uses. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development and are intended to be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) and applicable permits during the development review phase of future proposed projects. New development adjacent to the MHPA would be required to address means of reducing these indirect impacts through implementation of the MHPA Land Use Adjacency Guidelines.

Designated MHPA within the CPU area is shown in Figure 5.1-7 and includes canyon areas as well as areas of grasslands, vernal pools, and upland habitats. As shown in Figure 5.1-7, a culvert under Otay Mesa Road west of Heritage Road comprises a wildlife corridor linking the Spring and Moody Canyon habitat complexes on the south to the Dennery Canyon habitat on the north. Additionally, the San Diego County MSCP is adjacent to and east of the CPU area. The Chula Vista Habitat Preserve is largely north of the CPU area.

Otay Mesa MHPA Guidelines

Otay Mesa is in the southern area of the MHPA which also includes Otay River Valley and Tijuana Estuary and Tijuana River Valley. The plan describes the Otay Mesa areas of the MHPA and its vision as a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability. The City's MHPA guidelines for Otay Mesa as excerpted from Section 1.2.1 of the MSCP Subarea Plan (City of San Diego 1997) are detailed in Section 5.4 of this PEIR.

Vernal Pool Lawsuit

In October of 2006, Judge Brewster issued a Decision and Injunction (Case no. 98-CV-2234-B(JMA)) in a lawsuit filed by the Southwest Center for Biological Diversity against the USFWS over the issuance of an ITP under Section 10 of the ESA to the City of San Diego based upon the MSCP. The lawsuit was limited to the seven vernal pool species, including two crustacean species (San Diego and Riverside fairy shrimp) and five plant species (Otay mesa mint, California Orcutt grass, San Diego button celery, San Diego mesa mint, and spreading navarretia).

The Court enjoined the City of San Diego's ITP for all pending and future development projects where "take" of any of the seven vernal pool species may occur, including:

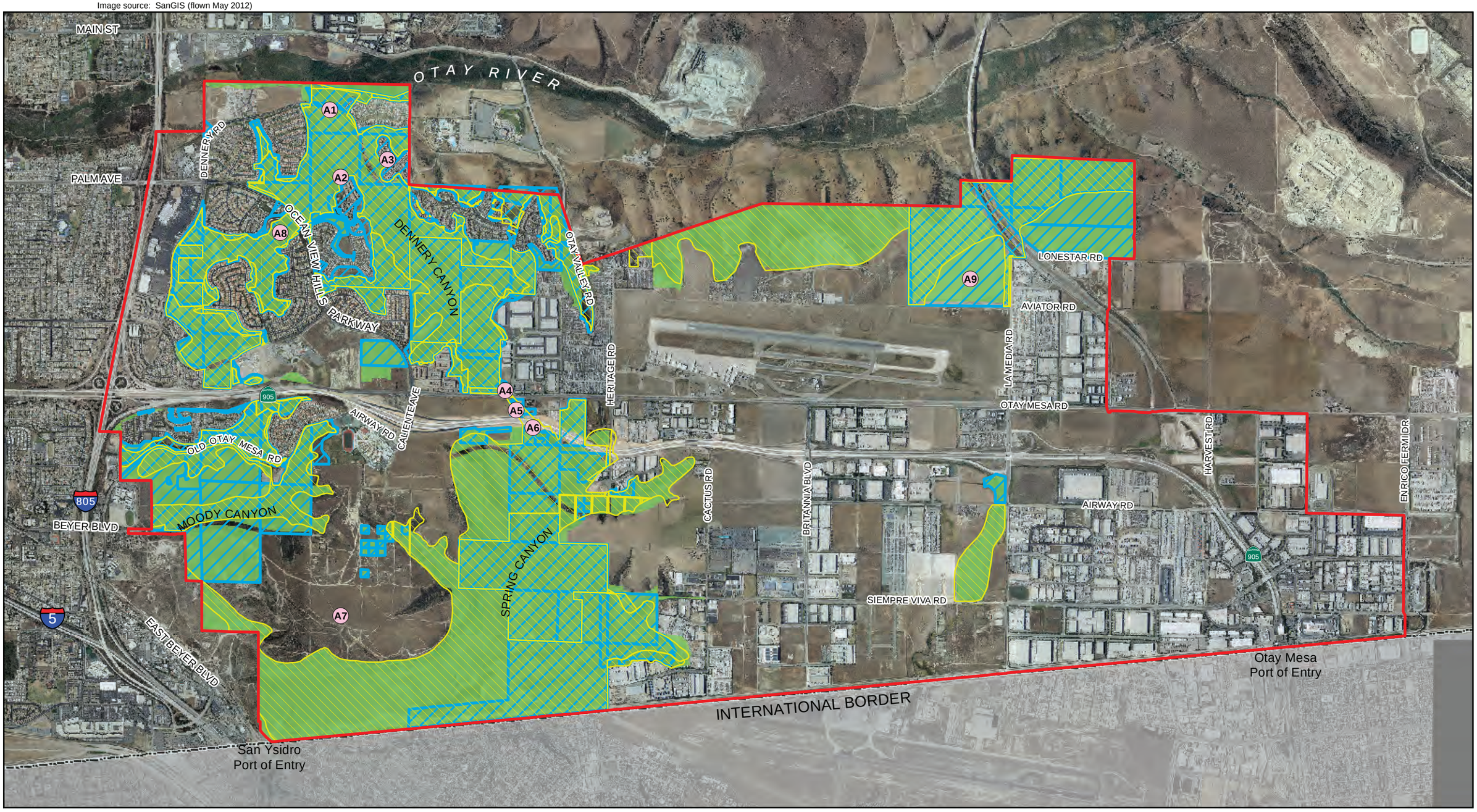
- Pending applications for development of land containing vernal pool habitat;
- Projects where the City has granted permits, but development had not yet occurred;
- Future development where the permittee was engaged in the destruction of vernal pool habitat.

As a result of this ruling, numerous private and public development projects, which contained vernal pool resources within their project site were enjoined. The Court determined that the City and USFWS were not providing adequate coverage under the MSCP for vernal species. The following are the main inadequacies identified in the ruling:

- Mitigation was not beneficial and could not be modified for the life of the permit;
- Creation of vernal pools was not feasible;
- Measures to determine impact allowance was arbitrary and did not provide the same level of protection for "unnatural" vernal pools;
- Funding was speculative.

All parties entered into mediation in 2007, which continued through 2009, when it ended in an impasse. During the meditation, it was determined that a Habitat Conservation Plan (HCP) would be prepared for the comprehensive protection of vernal pool resources. The City was awarded an Cooperative Endangered Species Conservation Fund (CESCF) Section 6 grant in 2009 for the preparation of a vernal pool HCP. In April 2010, the City entered into a Planning Agreement with the USFWS for the preparation of the HCP.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

MHPA Specific Guideline Areas

City of San Diego MHPA

SANGIS Conserved Lands Database

Otay Mesa Community Land Use Plan

Open Space

0 Feet 2,500

FIGURE 5.1-7

Designated MHPA within the CPU Area

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Also, in April 2010 the City relinquished federal coverage of the seven vernal pool species covered by the MSCP. The USFWS does not rely on the City's federal ITP to authorize incidental take for these species. In 2011, Judge Brewster declared the 2006 ruling moot since the relevant portions (i.e., vernal pool species) of the City's ITP were no longer in effect.

Upon completion of a HCP for vernal pools, the City would enter into an Implementing Agreement (IA) in order to obtain species coverage and a federal ITP for the seven vernal pool species. Incidental take authorization for projects that affect the seven vernal pool species could also be authorized through a Federal Endangered Species Act (FESA) Section 10 (a) or Section 7 consultation with the USFWS, initiated as part of the 404 permit process by the USACE. A Biological Opinion is issued that serves as the ITP.

f. SANDAG's Regional Comprehensive Plan

The RCP (2004) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The RCP establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The RCP encourages cities and the County to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. Basic smart growth principles designed to strengthen land use and transportation integration through an emphasis on pedestrian-friendly design and mixed-use development are summarized as follows:

- Mix compatible uses
- Take advantage of compact building design
- Create a range of housing opportunities and choices
- Create walkable neighborhoods
- Foster distinctive, attractive communities with a strong sense of place
- Preserve open space, natural beauty, and critical environmental areas
- Strengthen and direct development towards existing communities
- Provide a variety of transportation choices
- Make development decisions predictable, fair, and cost-effective
- Encourage community and stakeholder collaboration in development decisions

The RCP also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern

Baja California mutually benefit from San Diego's varied resources and international location.

g. SANDAG's 2050 Regional Transportation Plan and Sustainable Communities Strategy

SANDAG's 2050 RTP, adopted October 28, 2011, serves as the regional transportation planning tool for the County. It is a long-range advisory vision plan for transit, rail, and bus services, express or managed lanes, highways, local streets, bicycling, and walking. The RTP focuses on a Sustainable Communities Strategy (SCS) consistent with SB 375, ensuring social equality in developing the transportation system, projections on reasonably available financial resources, and offering more travel choices. The SCS details how the region would reduce greenhouse gas emissions to state-mandated levels over time. The vision presented in the RTP would be to develop a compact urban core where more people reside and use fewer resources. This vision reflects a transportation system that supports a robust economy and a healthy and safe environment with climate change protection while providing a higher quality of life for San Diego County residents. This includes better activity centers with homes and jobs enabling more people to use transit and walk and bike; efficiently transporting goods; and providing effective transportation options for all people.

It should be noted that the PEIR prepared for the RTP and SCS is the subject of ongoing litigation (as of printing of this PEIR).

5.1.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, a significant land use impact would occur if the CPU would:

1. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project; or

2. Result in the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the CPU, create land use incompatibilities or result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development; or

3. Result in a conflict with the purpose and intent of the ESL Regulation, the Historical Resources Regulations, and the Brush Management Regulation of the LDC; or

4. Result in a conflict with adopted environmental plans, including the City MSCP Subarea Plan and the MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area.

5.1.3Issue 1: Land Use Plan Conflict

Would the CPU conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project?

Applicable land use plans, policies and regulations for the CPU include the General Plan, SANDAG Regional Comprehensive Plan, SANDAG 2050 Regional Transportation Plan, Brown Field Master Plan and ALUCP and the City's MCSP Subarea Plan. (Consistency with the City's MSCP Subarea plan is discussed under Issue 4, below).

5.1.3.1Impact Analysis

a. General Plan

The CPU is intended to further express and refine General Plan goals and policies within the CPU area through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide implementation programs and mechanisms, such as zoning. The two documents are meant to work together to establish the framework for growth and development in the CPU area. The CPU contains 10 elements, consistent with the adopted General Plan, each providing community-specific goals and recommendations. As discussed in detail below, these goals and recommendations are consistent with development design guidelines, other mobility and public realm guidelines, incentives, and programs in accordance with the general goals stated in the General Plan.

The CPU would be consistent with the General Plan, which includes the City of Villages Strategy. As with the General Plan, the CPU places an emphasis on directing population growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. The CPU incorporates the City of Villages Strategy by designating two transit-oriented (village) centers along Airway Road, which would serve as the major transit route through the CPU area. The centers would be located within Specific Plan areas, which call for a mix of uses, close to transit, employment, and significant urban uses such as Southwestern College, schools, and a proposed community park.

Land Use Element

The Land Use Element of the CPU contains detailed descriptions and distributions of land uses as they are tailored to the CPU area, establishes five planning districts and two Specific Plan areas with village centers, provides refined residential densities, and

sets forth policies for the development of commercial, industrial, and institutional uses. As with the General Plan, the CPU places an emphasis on directing growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system, as illustrated through several goals of the CPU Land Use Element, including:

- Distinct villages that include places to live, work and recreate
- A variety of housing types including workforce housing in close proximity to jobs
- Diversified commercial uses that serve local, community and regional needs

Thus, the CPU is consistent with and would implement the goals and policies of the Land Use Element of the General Plan and would apply the City of Villages strategy to the setting and needs of the CPU area.

Mobility Element

The overall goal of the General Plan Mobility Element is to "further the attainment of a balanced, multi-modal transportation network that gets us where we want to go and minimizes environmental and neighborhood impacts." A balanced network is defined by the Element as one in which each mode, or type of transportation, is able to contribute to an efficient network of services meeting varied user needs.

The CPU refines the Mobility Element of the General Plan through community-specific pedestrian, bicycle, transit, streets, goods movement, truck traffic, and regional collaboration recommendations. Consistent with the General Plan Mobility Element, the CPU includes goals and policies that support the development of a multi-modal network and pedestrian-friendly facilities along major roadways and emphasizes a safe bicycle network, including:

- A pedestrian sidewalk and trails network that allows for safe and comfortable walking throughout the community
- An effective transit network that provides fast and reliable service to local and regional destinations
- A complete and interconnected street system that balances the needs of drivers, bicyclists, pedestrians and others
- A bicycle commuter network that links residents to transit, recreational, educational, and employment opportunities within the community

The CPU also includes transit priority measures such as transit lanes, queue jumpers and signal priority measures, which would allow transit to bypass congestion and result in faster transit travel times. The CPU is therefore consistent with the Mobility Element of the General Plan.

Urban Design Element

The General Plan Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems and targeting new growth into compact villages. The Urban Design Element of the CPU supports and implements the General Plan vision relative to urban design at the community-scale by including specific goals, design guidelines and policies for the CPU area including:

- An urban form that reflects the physical land as an amenity and provides an attractive built environment.
- A Southwest Village and Central Village that respect and showcase Spring Canyon.
- Clear, formalized routes that connect villages and major corridors to employment centers, core commercial areas, schools, parks, trails, and transit.
- An urban forest that distinguishes the Districts.
- Attractive gateways at key entrances to the community's district's and villages.

The goals of the CPU implement the Urban Design Element of the General Plan in that they promote the preservation of existing natural features, such as canyons and natural habitat; focus new residential and commercial development with two new compact, mixed-use villages along a transit route; and provide for design features that articulate the unique features of the community.

Economic Prosperity Element

The policies of the General Plan Economic Prosperity Element are intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities. To ensure that industrial uses, especially those base sector industries supporting the international border economy, remain viable in the CPU area, the CPU Economic Prosperity Element strives to protect and preserve Prime Industrial Lands (PIL), provide a transition zone between predominantly industrial and residential areas, promote infill commercial and office development, and encourage the use of local and state programs to incentivize business retention and expansion. The community-specific goals of the CPU Economic Prosperity Element that further express the goals of the General Plan are outlined below.

The CPU contains strong goals, policies and recommendations to support the preservation and enhancement of Otay Mesa's industrial lands. In the CPU, industrial land use comprises approximately 27 percent, or 2,528 acres of the planning area. Much

of this land is proposed for identification as Prime Industrial Lands, which will be added to the General Plan PIL map. The determination of the acreage, location, and type of industrial land proposed in the CPU was based on an evaluation of General Plan industrial lands criteria, market studies of industrial land use demand and absorption, the role of Otay Mesa industrial uses to the local and regional economy, identification of sensitive biological resources, identification of needed land uses to support the industrial uses, evaluation of infrastructure needed to support various land uses, and opportunities to provide housing and implement the City of Villages strategy. The evaluation of industrial lands was the subject of detailed and extensive discussions with the community, stakeholder groups, industry representatives and others. In addition, a focused report on this topic was presented to the Planning Commission in January 2007. The proposed industrial land use acreage represents a three percent reduction as compared to the adopted plan; two percent of the land is converting to Open Space due to the presence of sensitive biological resources; and one percent is shifting to a Village land use designation.

- Sufficient land and infrastructure capacity for base sector industries to support the international border economy and the greater San Diego region
- Flexibility for industrial, export-oriented businesses to respond quickly to international market competition and demand
- Employment and economic growth through diversified industrial land uses
- Integrated interregional and bi-national activities
- Employment opportunities in Otay Mesa, South County, and Mexico easily accessible to workforce housing
- Commercial uses that support Otay Mesa's industrial community
- Community educational resources to enhance workforce skills and abilities

The goals of the CPU Economic Prosperity Element are consistent with and further implement those of the General Plan relative to economic development and the preservation of industrial land.

Public Facilities, Safety and Services Element

Consistent with the Public Facilities, Services, and Safety Element of the General Plan, the CPU also includes goals to provide and maintain infrastructure and public services for future growth without diminishing services to existing development. Specific policies regarding public facilities financing, public facilities and services prioritization, as well as water, wastewater, storm water, waste management, fire-rescue, police, libraries,

schools, public utilities, and healthcare services and facilities, are all included within the CPU.

Recreation Element

The General Plan Recreation Element provides citywide guidance for the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users. The CPU Recreation Element includes community-specific policies addressing park and recreation guidelines, preservation, accessibility, joint use and cooperative agreements, open space lands and resource based parks. These policies, consistent with the General Plan policies, provide a comprehensive parks strategy for Otay Mesa.

Conservation Element

The CPU Conservation Element builds on the General Plan Conservation Element with policies tailored to conditions in Otay Mesa. The Conservation Element addresses open space and habitat protection, and also contains policies on how to meet the sustainability goals of the General Plan in areas that have been identified as suitable for development. The CPU Conservation Element is also responsive to state legislation calling for greenhouse gas emissions reductions to be achieved in part through coordinated land use and transportation planning, and more sustainable development practices. Therefore, the CPU is consistent with the conservation policies of the General Plan.

Noise Element

The CPU area supports substantial industrial uses, along with major roadways and interstates. The CPU includes goals and policies consistent with the General Plan to guide compatible land uses and the incorporation of noise attenuation measures for new uses, which would protect people living and working in the CPU area from an excessive noise environment. Where possible, the CPU proposes to locate new noise sensitive uses in areas that would avoid or attenuate excessive or harmful noise levels.

As discussed in Section 5.10, Noise, of this PEIR, the CPU has the potential to site noise sensitive uses (i.e., residential) adjacent to noise generating commercial and industrial uses, resulting in potentially significant noise impacts. The framework of federal, state, and local regulations and policies generally would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Ordinance. However, because of the variability of noise sources and the proximity to existing and potential stationary noise sources in the CPU area, it cannot be guaranteed that proposed uses would not expose existing uses to substantial increases in noise levels. Thus, noise attenuation measures must be addressed at the project level.

Likewise, exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road. Additionally, there are areas within the CPU area where future traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. As these may be older residences, which would not have been constructed to achieve current interior noise standards, there is the potential that project traffic may generate noise levels that exceed current standards at these existing residences. While the regulatory framework would provide for the maximum practical noise abatement that can be implemented at the project-level, because of the variability of noise sources and the proximity to existing and potential noise sources in the CPU area, it cannot be guaranteed that proposed uses would not expose existing uses to traffic noise levels in excess of City standards. As described in detail in Section 5.10, impacts related to traffic noise would be significant at the program-level and noise attenuation must be addressed at the project-level.

The CPU includes policy 9.2-2, which requires that projects "demonstrate that required noise levels for individual development projects within Otay Mesa are considered compatible with the General Plan Noise Land Use Compatibility Guidelines." Therefore, despite the potential for impacts associated with buildout of the CPU to noise sensitive land uses, the CPU would be consistent with General Plan Noise Element Land Use Compatibility Guidelines.

Historic Preservation Element

The General Plan Historic Preservation Element is intended to preserve, protect, restore, and rehabilitate historical and cultural resources throughout the City. The CPU Historic Preservation Element includes specific policies addressing the history and cultural resources unique to Otay Mesa in order to encourage appreciation of the community's history and culture. These polices along with the General Plan policies provide a comprehensive historic preservation strategy for Otay Mesa. The CPU is therefore consistent with the General Plan, relative to historic preservation policy direction.

In summary, the CPU contains 10 plan elements, each providing community-specific goals and recommendations, along with an implementation element. Overall the CPU incorporates goals and policies intended to support the General Plan policies. Therefore, land use impacts would be less than significant.

b. Land Development Code (Zoning) and OMDD

Existing zoning for the CPU area reflects the land use designations of the adopted Community Plan upon which it is based. The CPU would introduce higher density residential and commercial land use designations, as well as several new mixed-use and industrial land use designations not currently reflected in the LDC, including the OMDD. As part of the CPU process, the City would rescind the existing OMDD that currently

serves as the CPU area's zoning regulations and replace it with both new and existing zones that would allow for implementation of the new land use designations proposed by the CPU. A rezone of the CPU area and amendments to the LDC are proposed concurrently with the CPU. The new or modified zones that would be adopted within the LDC as part of the CPU are detailed in Section 3.0.

Application of existing, new, or modified zones would accommodate existing development that conforms to the future vision for development within the CPU area, encourage new development projects that are consistent with community goals and character, and implement mixed-use development consistent with the General Plan goals and policies. A description of the proposed land uses and allowed densities are included in Table 3-2.

c. Brown Field Airport Land Use Compatibility Plan

The current ALUCP for Brown Field was adopted in January 2010. Both aircraft noise and overflight of aircraft from Brown Field Municipal Airport affects the CPU area. As shown in Figure 5.1-4, the Brown Field 65 CNEL contour of the ALUCP encompasses the area surrounding the runway corridor, and remains largely within the Brown Field property. It does extend beyond the Brown Field property at both ends of the runway, onto land designated for Industrial uses. Section 5.10 of this PEIR discusses in greater detail the noise effects of the CPU in relation to the Brown Field noise contours. Generally, land uses considered incompatible inside the 65 CNEL airport contour include residential uses, schools, libraries, nature preserves, and parks and playgrounds. Based on the adopted CNEL noise contours for Brown Field and the ALUCP Land Use Compatibility matrix, no incompatible land uses are proposed by the CPU for areas within the 65 CNEL contour. The CPU would, therefore, be equally compatible with the Brown Field ALUCP and no significant plan inconsistencies between the CPU and Brown Field would occur relative to noise.

The AIA for Brown Field, as shown on Figure 5.1-5, extends well outside the airport property, north into the City of Chula Vista; east into unincorporated San Diego County; south to the international border and west into the Cities of Imperial Beach and National City. The Safety Zones as established by the ALUCP are illustrated on Figure 5.1-6, and also extend to both the east and west outside of the airport property.

The noise and overflight policies and criteria contained in the ALUCP for Brown Field are addressed in the General Plan Noise Element and are implemented by the supplemental development regulations in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code. In order to ensure that future development within the CPU area addresses airport land use compatibility issues consistent with adopted policies and regulations, the CPU Noise Element includes Policy 9.1-1. Policy 9.1-1 states that projects "satisfy all applicable conditions and criteria in the Airport Land Use

Compatibility Plan for Brown Field prior to the approval of individual development projects for any proposed building or uses located within the AIA for Brown Field."

Implementation of this policy would ensure that buildout of the CPU area would occur in a manner consistent with the adopted ALUCP for Brown Field and related policies and regulations, and therefore, no land use inconsistency would occur.

d. SANDAG's Regional Comprehensive Plan

The village areas of the CPU would be consistent with the goals of the RCP of compact, walkable communities with transit connections based on smart growth principles, as summarized in Section 5.1.1.2.b above. The CPU proposes to establish pedestrian-oriented, urban and community mixed-use villages that would reduce reliance on the automobile and promote walking and use of alternative transportation. The CPU supports the multi-modal strategy of the RCP through the designation of two high-density mixed-use villages along a rapid bus transit corridor. Transit is proposed along Airway Road, which would connect the villages, activity centers, and employment centers. Also, dedication of transit right-of-way and application of transit-oriented development design principles would support increased transit use and facilitate the implementation of future rapid bus transit and express transit stations. Policies contained within the CPU Chapter 2.0, Land Use, and Chapter 3.0, Mobility, serve to promote bus transit use, as well as other forms of mobility, including walking and bicycling. These measures are consistent with the RCP's smart growth strategies.

No significant adverse environmental effects would result from the adoption of the CPU and associated actions in terms of consistency or conflict with the RCP.

e. SANDAG's 2050 Regional Transportation Plan

The CPU is consistent with the intent of RTP in that it facilitates the development of a regional employment and housing center, which would maximize density and transit opportunities, an important goal of the RTP (see Section 5.1.1.2.b). Proposed land use designations would allow for a concentrated mix of high density residential, retail, and office and industrial uses around transit centers and along major transportation corridors that would help to maximize use of transit and to reduce long commutes.

The 2050 RTP identifies a bus rapid transit corridor called the South Bay BRT. The CPU would provide a rapid and reliable transportation alternative, connecting downtown San Diego and the Otay Mesa POE, as shown in Figure 3-4. This new BRT would provide access to regional employment centers in downtown San Diego, Otay Mesa, and the future Chula Vista Eastern Urban Center, as well as serve residential communities in Chula Vista and National City. Implementation of the CPU would, therefore, relieve traffic congestion in a major transportation corridor. Airway Road would serve as the principal community transportation and activity corridor The transit route proposed to travel along

Airway Road would link villages, employment centers, and Southwestern College within Otay Mesa. Consistency with the RTP is important to the CPU in so far as regional discretionary funding would be made available to jurisdictions that implement the vision of the 2050 RTP. As a result of consistency with the RTP, the City would be eligible for additional funding to help achieve the mobility improvement goals identified throughout the CPU Mobility Element.

No significant adverse environmental effects would result from the adoption of the CPU and associated actions in terms of consistency or conflict with the RTP.

5.1.3.2Significance of Impacts

a. Local Plans Consistency

The goals, policies, and programs of the CPU are consistent with existing applicable local land use plans, policies and regulations. As discussed above, the CPU land use plan designates two community villages close to transit, employment, and other significant urban uses, which is consistent with the General Plan and the City of Villages strategy. Similarly, the CPU would concentrate industrial and non-residential uses in the eastern portion of the CPU area to ensure that residential uses are buffered from the existing and potential future industrial uses that have existed and are planned to continue within Otay Mesa. Furthermore, as discussed in detail in Section 5.1.3.1.a, the policies developed for the CPU associated with each of the 10 elements were drafted in a manner that is consistent with the General Plan, supporting diversity of development within the community, provision of infrastructure concurrent with need, and with an emphasis on the protection of existing natural resources and landforms and sensitive habitat within the CPU area. As such, impacts would be less than significant with adoption of the CPU and associated actions.

As discussed in Section 5.1.3.1, the City would rescind the existing OMDD that serves as the CPU area's zoning regulations and replace it with LDC Citywide zones that would include new and revised zoning to accommodate existing desirable uses and encourage future development consistent with the CPU. This LDC amendment would ensure consistency with the proposed land use plan. The CPU also features transit-oriented uses intended to encourage greater transit and other alternative modes of transportation to reduce congestion and parking demand. Impacts would therefore be less than significant.

The CPU would be consistent with the adopted ALUCP for Brown Field. Both the General Plan and the Municipal code provide policies for land use compatibility that would be implemented for future development. The CPU also would require all future development proposals to demonstrate consistency with the adopted ALUCP. Impacts would therefore be less than significant.

b. Regional Plan Consistency

The CPU incorporates the multi-modal strategy of both the RCP and RTP through the designation of two high-density mixed-use villages along a BRT corridor. In addition, the CPU includes policies related to land use, mobility, and circulation/transportation that promote the RCP's smart growth strategies. As such, no inconsistencies have been identified, and impacts would be less than significant.

5.1.3.3Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.1.3.4Significance after Mitigation

Impacts would be less than significant; therefore, no mitigation is required.

5.1.4Issue 2: Land Use Compatibility

Would the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the CPU, create land use incompatibilities or result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development?

5.1.4.1Impacts

The General Plan Economic Prosperity Element, defines collocation as "…the geographic integration of residential uses or other non-industrial uses into industrial uses located on the same premises." The discussion below addresses the issue of collocation as defined in the General Plan, as well as the issue of residential-industrial adjacency, where residential and industrial land uses would be located adjacent to one another, but not necessarily on the same premises. The issues of concern regarding collocation pertain to the potential land use incompatibility and interface issues that arise due to different thresholds of noise, air quality, odor, aesthetics, traffic, and public health and safety for residential versus industrial use.

Conversion is defined as a change in land use of industrially designated land to residential or other non-industrial uses. The issues of concern regarding conversion of industrial lands pertain to the potential direct and indirect environmental effects that may result from the loss or conversion of industrial designated land.

a. Collocation

Three locations within the CPU area would include the interface of industrial and residential uses, as shown in Figure 3-2. In the first location, a small area of medium density residential (within the Northwest District) would be adjacent to a larger tract of light industrial designated land (within the Airport District). The approximately 10-acre site that includes the residential, commercial, and industrial uses has been through the permit process, and the project area has been designed to minimize interaction between the residential and industrial uses. The light industrial development would occur on the rear lot with access for trucks provided on the south side of the project area, helping to separate the use and associated activities from the commercial and residential uses. No impacts relative to collocation would occur in this location.

The second residential-industrial interface area within the CPU area would occur between the Central District and the South District. As shown in Figure 3-2, in this location the Central Village Specific Plan Area would be located west of land designated for industrial uses (business park), and separated by Cactus Road. The Central Village also would be located north of a heavy industrial designated area, separated by Siempre Viva Road and Spring Canyon. Future occupants of the residential uses within this residential-industrial interface area would potentially experience adverse effects due to noise, aesthetic/visual incompatibility, air pollution, odor, truck traffic, or hazardous materials exposure, from the adjacent industrial areas.

To avoid or reduce potential impacts associated with the collocation of residential and industrial uses, the CPU generally focuses lighter, more residentially-compatible industrial uses adjacent to multi-family residential areas, while locating heavier, less residentially-compatible categories of industrial uses to the south and southeastern edges. The CPU also includes policies, specified below, that would seek to alleviate issues associated with collocation of industrial and residential uses. A Specific Plan would be prepared for the Central Village area, and will contain more detailed land use designations for the village area. It is anticipated that transitional land uses, such as commercial uses, and also landscaping, parking, and set backs would occur in the interface area and that the residential uses would then be separated from industrial uses. Additionally, the Otay Mesa CPIOZ would apply to the areas designated for industrial uses. The CPIOZ would ensure consistency of all future development within these areas with CPU direction and policy, including otherwise future ministerial projects.

The third area subject to potential issues related to collocation would be development within the Business Park-Residential permitted land use category. The area designated Business Park Residential Permitted would be placed into a Community Plan Implementation Overlay Zone (CPIOZ) that, along with the CPU would regulate development within the land use designation. The CPU would allow for the collocation of residential and industrial uses within the CPIOZ. This Business Park-Residential designation would only be applied in one location, at the northwest corner of the

intersection of Britannia and Airway Roads, south of SR-905. Residential uses adjacent to industrial areas would potentially be affected by: noise from adjacent industrial uses in excess of General Plan land use-noise compatibility standards; negative community visual character caused by disproportionate bulk, height or design of industrial structures; roadway congestion and mobility hazards due to industrial truck traffic, and increased health risks due to industrial air pollutants and hazardous materials use, storage, waste disposal, and transport.

To avoid or reduce potential impacts associated with the collocation of residential and industrial uses within the Business Park-Residential Permitted, zoning would restrict the industrial uses to generally office and research, with manufacturing limited to prototype assembly of new products; no heavy industrial uses would be permitted. Additionally, the CPIOZ would limit the amount of residential use to a maximum of 49% of the area of the CPIOZ and require that the lot area, lot dimensions, floor area ratio, and setbacks be in accordance with the IP-3-1 zone. The CPU also includes policies, specified below, that would alleviate issues associated with collocation of business park and residential uses.

Various policies contained within the CPU serve to limit incompatibilities at the interface between residential and industrial uses and to promote both a desirable residential community and opportunities for continuing industrial development. Consistent with the General Plan Economic Prosperity Element and its Residential and Industrial Collocation and Conversion Policies, the CPU seeks to minimize land use conflicts and to preserve the most important types of industrial land within the CPU area. Preparation of the CPU considered citywide economic prosperity goals and, based upon a comprehensive evaluation of the General Plan's collocation/conversion suitability factors (see Appendix C, EP-2 of the General Plan), developed the land use plan and identified several design and siting policies to be included in the CPU, applicable to future development. The CPU goals and policies are based upon many factors, including a comprehensive evaluation of market analysis, housing needs, and resource protection. Through the CPU's separation of residential and industrial land uses, and its fostering of innovative industrial land uses, implementation of the collocation/conversion suitability factors is demonstrated throughout the plan. These policies and design guidelines for residential-industrial interface areas include:

2.2-4 Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.

2.4-2 Provide adequate land use buffers and/or distance separation from residential uses for heavy industrial proposals with hazardous or toxic substances

a. Consider office, commercial, retail and parking uses as acceptable buffer uses within the village freeway interface area.

b. Locate schools, parks and libraries outside of interface areas. (see Section 5.3 Air Quality for details about facilities and buffer distances)

c. Determine distance separation on a case by case basis based on an approved study submitted by an applicant, or if no study is prepared, provide a 1,000-foot minimum distance separation between property lines.

d. Apply the buffer to sensitive receptors located along the Mexican Border.

2.4-3 Reduce or mitigate the environmental and negative impacts of Heavy Industrial uses on surrounding areas, such as noise, visual, and air quality impacts. Consider design elements that include, but are not limited to, landscape, site orientation, fencing, and screening.

2.4-4 Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.

2.4-7 Allow for a wide range of businesses that do not negatively impact sensitive receptors to locate in the Business Park and areas adjacent to parks and village areas.

a. Provide adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to public parks and village areas.

2.4-8 Allow office, research and development, and optional residential uses <u>with industrial proposals</u> in the Business Park-Residential Permitted area.

a. Allow optional residential uses with <u>industrial</u> proposals that conform to APCD and HAZMAT adjacency guidelines and regulations.

b. Implement proposals with optional residential uses with Business Park Residential Permitted CPIOZ, where the residential use does not exceed 49% percent of the contiguous are with the Business Park, Residential Permitted, and the density range for the multifamily residential uses is 15-44 dwelling units per acre.

2.4-9 Provide adequate buffers, such as land uses, landscape, walls, and distance between the residential component of the Business Park Residential Permitted lands, SR-905, and Britannia Boulevard to minimize negative impacts air quality, noise, and of truck transportation on residents.

4.1-9 Create a visual and distance separation between the public right of way and industrial uses such as auto dismantling, truck transportation terminals, and other

uses that create noise, visual, or air quality impacts. Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening.

4.1-17 Require a distance separation, which may include landscape treatments, parking, sidewalks and street right-of-way, between the IBT and Heavy Industrial uses of the South District and the village and educational facilities of the Central District.

4.2-2 Incorporate connectivity and walkability in the design of the street network.

a. Apply traffic-calming techniques that address vehicular/truck and pedestrian movements where the truck routes are adjacent to village and park uses.

4.5-8 Create a visual buffer between Heavy Industrial sites and public streets, public facilities, and open space.

a. Create a berm within the setbacks facing the public right of way.

b. Place a masonry wall along the berm, with variation breaks for articulation.

c. Include a landscape buffer between the sidewalk or street and the berm and wall for additional screening.

d. Require street trees from Appendix B, the Street Tree Plan for Otay Mesa.

7.1-12 Site the Grand Park at the southwestern corner of Cactus Road and Airway Road

a. Site the Grand Park beyond any buffer areas for industrial to the east and south.

In addition to the CPU policies stated above, to avoid potential land use conflicts, protect the health, safety and welfare of residents and users, and ensure favorable conditions for business and industry, the CPU also includes special Residential-Industrial Interface performance standards within the Land Use Element. Design considerations also are provided in the Urban Design Element, which specify special building orientation, facade treatments, landscaping and screening policies for industrial uses. Proposed zoning also would regulate for outdoor and storage areas, truck loading, location and operation of machinery, interior noise, and shared parking.

In addition to policies contained within the CPU and General Plan that address collocation and the residential-industrial interface issues, certain City, state, and federal regulations also impose mandatory controls on industrial and residential land uses. For example, the City Noise Ordinance includes thresholds for exterior noise levels that cannot be exceeded at the edge of property lines for given land uses. These standards are mandatory and are enforced through the building permit and development approval

process. Violations of the City Noise Ordinance are resolved through the City's Police Department and Neighborhood Code Compliance Division of the Development Services Department, which serve to ensure that noise standards are observed.

An extensive network of local, state, and federal laws governs the handling of hazardous materials, including the siting of facilities that use hazardous materials; the transport of hazardous materials by interstate and cross-border trucks; the identification, reporting, and cleanup of any hazardous spills or leaks; and implementation of an emergency evacuation and response plan.

Air pollutant emissions are also heavily regulated by local, state, and federal authorities and industries must comply with mandatory air quality thresholds, including the requirement that industries monitor air emissions quality. These are further discussed in Section 5.3 of this PEIR.

In summary, through the implementation of General Plan and CPU policies, as well as strict compliance with local, state and federal regulations, impacts associated with the collocation of the residential and industrial land uses would be less than significant.

b. Conversion

The CPU would redesignate land currently designated for industrial use to residential, mixed residential-commercial, and institutional uses. Generally, the adopted community plan designates industrial parks/light industrial for the entire eastern two-thirds of the CPU area, excluding Brown Field, the Otay Mesa POE, and two commercial subdistricts centered on SR-905 immediately north of the POE and further west at the intersection of La Media Road. The industrial designated land of the adopted community plan equals approximately 2,839 acres and coincides with the existing OMDD boundary (City of San Diego 2011a).

Implementation of the CPU would result in the conversion of existing industrial lands within the CPU area to non-industrial uses, primarily residential and mixed-use residential-commercial and institutional uses. The conversion of existing industrial land to residential, commercial and institutional uses would occur within the Central Village specific planning area. Some existing agricultural lands also would be converted to residential, mixed and institutional land uses, primarily within the Central Village specific planning area. Changes in land use would, however, occur gradually over time, as development consistent with the CPU is approved and constructed. Therefore, during buildout of the CPU, the development of non-industrial uses next to existing industrial operations may occur, as described above under "Collocation".

Chapter 5.6, Human Health/Public Safety/Hazardous Materials identifies numerous existing sites within the CPU area that store, utilize, or transport hazardous materials. Conversion of industrial lands to mixed residential uses would result in the placement of

a greater number of people, particularly full-time residents, in proximity to the hazardous sites. Also, hazardous materials sites were identified in conjunction with existing agricultural operations. Conversion of these sites to non-agricultural uses could potentially expose future residents or occupants to hazards conditions.

Numerous local, state, and federal laws govern the use of hazardous materials, including the siting of facilities that use hazardous materials; the transport of hazardous materials by interstate and cross-border trucks; the identification, reporting, and cleanup of any hazardous spills or leaks; and implementation of an emergency evacuation and response plan. The impacts of the conversion of some existing industrial and agricultural lands to other uses would be evaluated on a case-by-case basis as future projects are proposed for development in former industrial or agricultural areas. As discussed in Section 5.6, Hazards, impacts associated with hazardous material sites would be reduced to less than significant through the application of the development review procedures and site-specific environmental review in accordance with CEQA.

5.1.4.2Significance of Impacts

a. Collocation

The CPU would place residential and industrial uses in proximity to one another, which would have potential impacts associated with the collocation or interface of incompatible land uses as described above. Land use incompatibility would be associated with the different thresholds for noise, air quality, odor, visual quality, traffic and heavy truck mix, and hazardous materials risks for industrial versus residential use. The CPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. Future development projects would be required to comply with the collocation policies of the General Plan and CPU, which are necessary to reduce or avoid potential land use incompatibility impacts (including noise, odor, air quality, traffic, parking, trucks, hazardous materials), and which would include but not be limited to the special policies and performance standards for residential-industrial interface areas, truck circulation, and industrial design, as well as the relevant and mandatory city, state, and federal controls on industrial and residential land uses. Compliance with the CPU and General Plan policies, along with local, state and federal regulations, would reduce potential impacts of collocation to below a level of significance.

b. Conversion

The CPU would entail the conversion of industrial and agricultural lands to residential and other mixed uses. The environmental effects that would result include the increased potential for exposure of sensitive receptors to hazardous materials. Through implementation of the measures identified in Section 5.6, the potential environmental

impacts resulting from change in land use designations in accordance with the CPU would be less than significant.

5.1.4.3Mitigation Framework

a. Collocation

Impacts would be less than significant; therefore, no mitigation is required.

b. Conversion

Impacts would be less than significant; therefore, no mitigation is required.

5.1.4.4Significance after Mitigation

Impacts would be less than significant; therefore, no mitigation is required.

5.1.5Issue 3: Regulation Consistency

Would the CPU result in a conflict with the purpose and intent of the ESL Regulations, the Historical Resources Regulations, and the Brush Management Regulations of the LDC?

5.1.5.1Impact Analysis

a. Environmentally Sensitive Lands Regulations

Within the CPU area, ESLs include sensitive biological species and habitats, vernal pools and other wetlands, floodplains, and steep hillsides. Any development within the CPU area that would encroach into ESL resources would be subject to the development restrictions of the ESL Regulations (Land Development Code, Section 143.0101 et. seq.).

The ESL Regulations do not allow development of any parcel entirely within the MHPA to exceed 25 percent of the parcel, with 75 percent required to remain as open space. Additionally, development would be directed toward the least biologically sensitive portion of the parcel. The Steep Hillside Guidelines of the ESL Regulations also state that development of steep hillsides outside of the MHPA is only allowed when necessary to achieve a maximum development area of 25 percent of the premises. For areas outside of the MHPA, the ESL does not limit development encroachment into sensitive biological resources, with the exception of wetlands and listed non-covered species habitat and narrow endemics. However, impacts would be evaluated and mitigation, provided in conformance with Section III of the City's Biology Guidelines. Non-covered species are species listed or proposed for listing by federal or state governments as rare,

endangered, or threatened. These may not be considered adequately conserved under the MSCP/MHPA. Sections 143.0145 and 143.0146 of the ESL Regulations contain updated development regulations for projects within Special Flood Hazard Areas (SFHAs). All future projects implemented in accordance with the CPU which are located within the 100-year flood hazard area as identified in a project-specific drainage study, would be subject to the CPIOZ and subsequent review in accordance with the ESL Regulations. The ESL Regulation further requires that each project must be studied to determine the effects to base flood elevations and ensure they would not result in flooding, erosion, or sedimentation impacts on or off-site. This is further addressed in Section 5.7, Hydrology/Water Quality.

Due to the presence of resources affected by the ESL regulations, future development with the CPU area would be required to comply with the provision to minimize impacts to environmentally sensitive lands to the maximum extent practicable. The identification of specific ESL resource locations and compliance with development encroachment allowances would be conducted at the project-level, through the Site Development Permit process. If it is determined that proposed future development does not comply with the ESL encroachment allowances, a deviation would be requested and may be granted by the City if certain findings are made.

The CPU also includes several policies which aim to reduce the impacts of future development to sensitive resources covered under the City's ESL regulations. These policies include:

8.1-1 Implement the Environmentally Sensitive Lands ordinance related to biological resources and steep slopes for all new development.

8.1-2 Preserve a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability.

8.1-3 Plan development to minimize grading and relate to the topography and natural features of Otay Mesa.

b. Historical Resources

The Historical Resources Regulations (Section 143.0210 of the LDC) apply when historical resources are present. As defined by the HRR, historical resources include: historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. Based on results of several site-specific cultural resources surveys conducted for the CPU Circulation Element roadway improvements, regional surveys conducted as part of past inventories, record search results for the CPU, numerous historical resources are known to occur throughout the CPU area. Specifically, several designated historic structures

are located within the Brown Field Historic District just south of the landing strip within the Brown Field Municipal Airport. Another designated resource is the remains of the Alta School Site which is located just outside of the Brown Field property on the north side of Otay Mesa Road. Based on the information noted above, there is a potential for unknown, historical (archaeological) resources to be encountered as a result of future development implemented in accordance with the CPU.

Due to the presence of historical resources in the CPU area, the following policies relative to the preservation of historical resources are included:

10.1-1 Require archaeological surveys and consultation with interested Native Americans as part of future development within Otay Mesa.

10.1-2 Consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American cultural sites that may be identified as part of future development within Otay Mesa.

10.1-3 Consider eligible for listing on the City's Historical Resources Register any structure or site from the agricultural era that may be discovered as part of future development within Otay Mesa.

10.1-4 Consider eligible for listing on the City's Historical Resources Register any buildings associated with early military and flight activities of the community that may be identified as part of future development within Otay Mesa.

Impacts from future development on historical resources in the CPU area would occur at the project level. Any grading, excavation, and other ground-disturbing activities associated with future development implemented in accordance with the CPU that would affect significant archaeological sites or TCPs would represent a significant impact to historical resources. It should be noted, however, that future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). These project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of an Archaeological Survey prepared by a qualified archaeologist in accordance with the City's Historical Resources Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Historical Resources, contained in Section 5.5.

c. Brush Management Regulations

The City's Brush Management Regulations are intended to minimize wildland fire hazards through implementation of prevention activities and programs. Compliance with the Brush Management Regulations would be accomplished at the future project level through the development or construction permit process. Generally, brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. In consideration of the topography, existing and potential fuel load, and other characteristics of a site related to fire protection, the Fire Chief may, however, modify the requirements of Section 142.0412, and where applicable, with the approval of the Building Official, may require building features for fire protection in addition to those required in accordance with Chapter 14, Article 5, Division 7 and Chapter 14, Article 9, Division 3 of the LDC. Therefore, all subsequent projects within the CPU area would be required to comply with the Brush Management Regulations, or alternative measures as approved by the Fire Chief; therefore, no conflict with the Brush Management Regulations, or the equivalent, would occur, resulting in increased wildland fire hazard risk within the CPU area. Impacts would be less than significant.

5.1.5.2Significance of Impacts

a. Environmentally Sensitive Lands Regulations

The development footprint of the CPU would encroach into sensitive ESL areas. Future public and private development proposals would be required to comply with the ESL Regulations or process a Site Development Permit in order to deviate from the regulations. Additionally, all subsequent projects would be subject to review in accordance with CEQA. At which time, appropriate site-specific mitigation in accordance with the Mitigation Framework measures LU-2 and BIO-1 through BIO-4 would be identified for impacts to sensitive biological resources covered under the ESL. For other resource areas covered under the ESL Regulations, such as steep hillsides and floodplains, future projects would be designed to ensure compliance with the supplemental regulations and any other regulatory requirements to ensure that no impacts would occur. The CPU also includes several policies (see Table 5.4-5) which aim to reduce impacts to sensitive and other resources covered under the ESL Regulations as well as development regulations required for projects within areas covered by CPIOZ Type A, which address sensitive biological resources. Future projects would be required to comply with the above regulations, policies, and mitigation. Therefore, at the program-level the CPU would not be in conflict with the purpose and intent of the ESL regulations and potential impacts would be below a level of significance.

b. Historical Resources Regulations

Given the presence of historical resources distributed throughout the CPU area, implementation of the CPU has the potential to result in significant impacts to historical resources. The CPU includes several policies aimed to reduce impacts to historical resources within the CPU area as well as development regulations required for projects within areas covered by CPIOZ Type A which address archaeological resources. Additionally, incorporation of the mitigation framework for historical resources contained in Section 5.5 would reduce the potential for significant impacts at the project-level.

c. Brush Management Regulations

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

5.1.5.3Mitigation Framework

a. Environmentally Sensitive Lands Regulations

LU-1a: Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-2 and BIO 1-4 in Section 5-4, Biological Resources.

b. Historical Resources Regulations

LU-1b: Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework HIST-1 in Section 5-5, Historical Archaeological Resources.

c. Brush Management Regulations

Impacts would be less than significant; therefore, no mitigation is required.

5.1.5.4Significance after Mitigation

Potential impacts to environmentally sensitive lands and historical resources associated with future development would be significant. However, future projects would be required to comply with ESL and Historical Resources Regulations, the CPU policies, Mitigation Framework, and the City's Biology and Historical Resources Guidelines.

Additionally, all future projects would require subsequent environmental review and compliance with established development regulations, guidelines, and Mitigation Framework which would serve to reduce impacts to below a level of significant at the program-level. Therefore, the program-level environmental impacts related to CPU conflicts with the ESL and HRR regulations would be mitigated to below a level of significance.

5.1.6Issue 4: Environmental Plan Consistency

Would the CPU result in a conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan and the MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area?

5.1.6.1Impact Analysis

The CPU contains Conservation Element Policies 8.1-1, 8.1-2, 8.1-4, 8.1-5, and 8.1-6, as shown in Table 5.1-13, related to consistency with the MSCP Subarea Plan and other local, regional, and state conservation plans. As discussed below, future development located adjacent to the MHPA has the potential to conflict with the MSCP Subarea. Potential impacts to vegetation communities, sensitive species, and wildlife corridors as they relate to the MSCP are addressed in Section 5.4, Biological Resources.

TABLE 5.1-13
CPU CONSERVATION ELEMENT POLICIES

Number	Policy
8.1-1	Implement the Environmentally Sensitive Lands ordinance related to biological resources and steep slopes for all new development.
8.1-2	Preserve a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability.
8.1-4	Implement the MSCP Management Policies and Directives for Otay Mesa through the project review process.
8.1-5	Implement City regulations and Biology Guidelines for preservation, acquisition, restoration, management and monitoring of biological resources.
8.1-6	Implement Area Specific Management Directives and Conditions of Coverage as stated in Table 3-5 of the MSCP Subarea Plan for Species protected in Otay Mesa and identified in CPU Table 8-1.

a. MHPA

As designated in the Subarea Plan, the MHPA is the permanent preserve area for habitat conservation. Overall, the Otay Mesa MHPA was configured to support sensitive habitats and significant populations of Subarea Plan covered species known to exist at that time.

The CPU is consistent with the designated MHPA preserve area. Several roads included in the CPU Mobility element would be within or cross the MHPA. The MSCP limits roads in the MHPA to those identified in a community plan circulation/mobility element as collector streets essential for area circulation, and necessary maintenance/emergency access roads. Consistent with the MSCP, the CPU does not propose any new local streets within the MHPA. The MSCP provides additional policies relating to the construction of roads to minimize impacts and fragmentation of sensitive species and habitat.

Compatible land uses are outlined in Section 1.4.1 of the MSCP Subarea Plan include: (1) existing uses, (2) public access and recreation, (3) infrastructure, scientific and biologic activities, and (4) emergency, safety and police services. The MSCP provides specific requirements relating to the implementation of these allowed uses. All activities must be consistent with the MSCP Subarea Plan. Impacts from these compatible uses would be determined at the project-level and would require subsequent environmental review.

Boundary Adjustments

MHPA boundary adjustment(s) may be proposed as part of future development within the CPU area. The City's MSCP allows for adjustments to the MHPA boundary without the need to amend the MSCP Subarea Plan, provided the boundary adjustment results

in an area of equivalent or higher biological value. Six functional equivalency criteria in accordance with the Final MSCP Plan, Section 5.4.2 must be prepared as part of the MHPA boundary adjustment equivalency analysis. Any MHPA boundary adjustments would require concurrence from the Wildlife Agencies. Any MHPA boundary adjustments and functional equivalency analysis would be addressed at the time future development proposals are brought forward pursuant to the adopted CPU. Potential impacts to MHPA preserve configuration as a result of MHPA boundary adjustments would not be considered significant, because the adjustment must meet the required MHPA equivalency analysis criteria and obtain approval from the Wildlife Agencies. Potential impacts to sensitive vegetation and species would be analyzed and mitigated consistent with Mitigation Framework measures BIO-1 (uplands) through BIO-4 (wetlands) further detailed in Section 5.4, Biological Resources.

MHPA Land Use Adjacency Guidelines

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. These secondary effects of project development may include habitat insularization, drainage/water quality impacts, lighting, noise roadkill, exotic plant species, nuisance animal species, and human intrusion. These impacts could be short-term resulting from construction activities, or long-term. Short-term construction impacts could result in disruption of nesting and breeding thus affecting the population of sensitive species. To address these concerns, the MSCP includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project-level.

Indirect effects can occur wherever development and human activity is adjacent to natural areas. These effects include those due to increased runoff, trampling and removal of plant cover due to hiking, biking and other human activities, increased presence of toxins, increased nighttime light levels, and redirection or blockage of wildlife movement, increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. Future projects implemented in accordance with the CPU which are within and/or adjacent to the MHPA would be required to incorporate the MHPA Land Use Adjacency Guidelines (see Mitigation Framework measure LU-2 below) into the design of projects in order to reduce potential indirect impacts to the preserve from new development.

Future development proposals would be required to address indirect impacts and incorporate the MHPA Land Use Adjacency Guidelines. However, as implementation of the CPU would introduce land uses adjacent to MHPA, this is a potentially significant impact at the program-level.

b. Specific Management Directives for Otay Mesa

The MSCP envisions “a network of open and relatively undisturbed canyons containing a full ensemble of native species which provide functional wildlife habitat and movement capability.” Specific Management Directives are aimed at carrying out this vision and include measures to protect sensitive species, limit access into the canyons, provide wildlife crossing under Otay Mesa Road/SR-905, and address regeneration and restoration. The CPU would be does not conflict with the visions on the MSCP Subarea Plan and is consistent with the vision of the Otay Mesa MHPA; therefore, there are no significant, direct impacts anticipated to the MHPA.

5.1.6.2Significance of Impacts

a. MHPA

Boundary Adjustments

Future development implemented in accordance with the CPU may propose an adjustment(s) to the MHPA boundary, thus removing MHPA preserve in some locations and adding MHPA preserve in other locations. Provisions in the MSCP Subarea Plan require that any modification to the MHPA boundaries result in equal or better biological values; therefore, boundary adjustments associated with future development would not result in significant direct or indirect impacts associated with environmental or habitat conservation plans. Potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments would be considered less than significant, because the adjustment must meet the required MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies. Potential impacts to sensitive vegetation and species would be analyzed and mitigated consistent with Mitigation Framework measures BIO-1 through BIO-4.

MHPA Land Use Adjacency Guidelines

Potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. Implementation of the CPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact at the program-level.

b. Specific Management Directives for Otay Mesa

The CPU would not be in conflict with the MSCP Subarea Plan and is consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact, and the CPU incorporates policies for adhering to the Management Directives. No significant impacts relating to MSCP consistency would occur.

5.1.6.3Mitigation Framework

a. MHPA

Mitigation for direct impacts to sensitive vegetation, wetlands and vernal pools from construction of community plan circulation/mobility element roads, collector streets essential for area circulation, and necessary maintenance/emergency access roads within the MHPA shall be accomplished with implementation of Mitigation Framework measures BIO-1 through BIO-4.

Boundary Adjustments

Potential impacts to MHPA preservation configuration as a result of MHPA boundary adjustments shall be addressed through the required MHPA Boundary Line equivalency analysis. Impacts would be less than significant; therefore, no mitigation is required.

MHPA Land Use Adjacency Guidelines

MHPA adjacency impacts would be addressed at the project-level. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. To ensure avoidance or reduction of potential MHPA impacts resulting from new development adjacent to the MHPA, the following Mitigation Framework measures shall be required for all future projects as part of the subsequent environmental review and development permit processing:

LU-2: All subsequent development projects implemented in accordance with the CPU which is adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent development project in an area adjacent to a designated MHPA, the City of San Diego shall identify

specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA.

Specific requirements shall include:

- Prior to the issuance of occupancy permits, development areas shall be permanently fenced where development is adjacent to the MHPA to deter the intrusion of people and/or pets into the MHPA open space areas. Signage may be installed as an additional deterrent to human intrusion as required by the City.
- The use of structural and nonstructural best management practices (BMPs), including sediment catchment devices, shall be required to reduce the potential indirect impacts associated with construction to drainage and water quality. Drainage shall be directed away from the MHPA or, if not possible, must not drain directly into the MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and reviewed satisfactory to the City Engineer.
- All outdoor lighting adjacent to open space areas shall be shielded to prevent light over-spill off-site. Shielding shall consist of the installation of fixtures that physically direct light away from the outer edges of the road or landscaping, berms, or other barriers at the edge of development that prevent light over spill.
- The landscape plan for the project shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA.
- All manufactured slopes must be included within the development footprint and outside the MHPA.
- All brush management areas shall be shown on the site plan and reviewed and approved by the Environmental Designee. Zone 1 brush management areas shall be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area shall be the responsibility of a homeowners association or other private party.
- Access to the MHPA, if any, shall be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the Environmental Designee.

- Land uses, such as recreation 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 the application and/or drainage of such materials into the MHPA. Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement shall be incorporated into leases on publicly owned property as leases come up for renewal.

b. MSCP Specific Management Directives for Otay Mesa

Future projects would be required to implement the MSCP Specific Management Policies and Directives for Otay Mesa as discussed in 5.4.2. Therefore, impacts would be below a level of significance and no mitigation is required.

5.1.6.4Significance after Mitigation

a. MHPA

At the program-level, implementation of the CPU policies, compliance with established development standards and other applicable regulations as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives would serve to reduce impacts to below a level of significance.

Boundary Adjustments

Impacts to the MHPA Preserve would be addressed through the MHPA boundary line equivalency analysis and would be less than significant.

MHPA Land Use Adjacency Guidelines

At the program-level, implementation of the Mitigation Framework measure LU-2 would serve to reduce potential impacts due to future development adjacent to MHPA to below a level of significance,

b. MSCP Specific Management Directives for Otay Mesa

Impacts would be below a level of significance.

5.2 Visual Effects and Neighborhood Character

5.2.1 Existing Conditions

5.2.1.1 Existing Visual Landscape

a. Landform

The existing landform of the CPU area is characterized by a large mesa surrounded by canyon systems on the north, south, and west (see Figure 2-4). These canyon systems comprise a unique landform feature of the CPU area. Included within the canyon systems are steep hillsides (slopes in excess of 25 percent gradient, as defined in the Hillside Guidelines of the Environmentally Sensitive Lands Regulations of the Land Development Code), and wide, deep gullies containing sensitive habitats. A total of 19 percent of the CPU area, or 1,730 acres, contains steep hillsides in excess of 25 percent. Portions of these canyon systems are preserved as natural open space as part of the City's MHPA, as defined by the City of San Diego MSCP Subarea Plan.

While most of the large, flat mesa is fallow agricultural land or developed as residential, commercial, and industrial uses, portions of the mesa also support unique mima mound topography and associated vernal pool habitat. The San Diego National Wildlife Refuge Vernal Pool Units occur immediately north of Otay Mesa Road near the intersection of Ocean View Hills Parkway and contains this type of topographic feature.

To the north, outside of the CPU area, lies the natural landform of the Otay River Valley, and 3 miles to the east are the prominent San Ysidro Mountains.

b. Scenic Resources

In accordance with the State Scenic Highway Program, the General Plan classifies scenic highways and routes throughout the City. No roadways within the CPU area have been designated as scenic in the General Plan or adopted community plan. The nearest designated or eligible scenic roadway to the CPU area is I-5, approximately one-quarter mile to the southwest. Interstate 5, south of Coronado Avenue and I-805, is shown as being eligible for state scenic highway designation in the General Plan. Also outside the CPU area, SR-125 is designated as a scenic highway for 2 miles between SR-94 and I-8; however, this segment is quite a distance north of the CPU area. Neither the I-5 nor SR-125 scenic highway segment has views of the CPU area. No other scenic resources or scenic vistas have been designated in the CPU area by either the General Plan or adopted community plan.

c. Public Views

Public views are views from public resources such as public open space, public parks and schools, municipal buildings, and public roadways. Significant public viewing resources are typically identified and designated as scenic resources or scenic viewpoints in the applicable community plan. As described above, the adopted community plan does not designate any scenic view corridors, vistas, or other scenic resources within the CPU area.

Public views from outside the CPU area looking into the CPU area are limited due to visual barriers. Views into the CPU area from the OVRP are limited due to intervening topography and elevation differences. Between berms and vegetation, motorists on I-805 have intermittent views of the western edge of the CPU area. The western edge of the CPU area is predominantly developed with large retaining walls, multi-story residential structures, and large commercial developments. SR-125 motorists have views of the eastern portion of the CPU area, with views transitioning between open space to industrial developments, including large warehousing and truck storage facilities. Based on distance and atmospheric conditions (haze), views of the CPU area from the San Ysidro Mountains, three miles to the east are typically not visible, or if visible, are not prominent because of decreased scale and contrast.

Existing gateways to the community include SR-905 and Palm Avenue/Ocean View Hills from the west, Heritage Road and SR-125 from the north, Otay Mesa Road from the east, and the Otay Mesa POE from the south. These gateways provide the initial views of the CPU area. Only the Otay Mesa POE and Ocean View Hills gateways include community identification elements. The Otay Mesa POE includes cultural art work and the Ocean View Hills gateway provides community monument signage. Once within the CPU area, public views points include public roadways, designated open space areas, and other public use areas (primarily schools and parks).

Refer to Section 5.12, Transportation/Circulation (specifically, Section 5.12.1.2a) for a list of the key roadways within the CPU area, including roads that provide access to and from the community, roads within residential areas, and roads within industrial areas. The residential roads primarily have views of commercial, single- and multi-family neighborhoods, parks, and canyons. The residential and commercial developments are relatively recent and include neutral-colored stucco structures (i.e., tan, brown), one to two stories tall with heavy landscaping, and terracotta-tiled roofs. The industrial roadways generally have views of large warehouses and vehicle storage facilities, former dry-farming fields, and flat non-native grassland open spaces. The structures in the industrial area are generally large, boxy, single-story, neutral-colored buildings surrounded by parking lots and minimal landscaping. The vehicle storage sites are typically enclosed by a slatted or fabric-covered chain-link fence so the interiors are not visible from the roadways.

Both San Ysidro High School and Ocean View Hills Elementary School are located adjacent to Otay Mesa Road/SR-905 at the west end of the CPU area, west of Ocean View Hills Parkway and Caliente Avenue. Both schools are located near the leading edge of the mesa adjacent to the Moody Canyon system. Current views from the school sites consist of the lower natural open space canyons to the west and the developed mesa top to the north and east.

Several neighborhood parks exist within areas planned for residential development. The views from these parks primarily consist of adjacent residences, roadways, and Dennery Canyon. The open space areas within the CPU area contain trails along mesas and canyons. Some of these trails were created from Border Patrol vehicles and activities. While these trails are located within designated open space, the trails are not all within public land and none of them are formally designated trails. The informal web of trails does not follow an organized path, and therefore, the trails cannot be described individually. The trails are concentrated in Spring, Moody, and Dennery canyons. Due to the topography, the views from trails within the canyons are mostly limited to the canyons themselves. Structures are visible from canyon trails where development abuts canyons. The trails along the flat mesas have views of the mesas until interrupted by structures or an increase in topography.

d. Community Character

Generally, the character of the southwestern one-third of the CPU area reflects undeveloped non-native or native grasslands and densely vegetated canyons, which transition to industrial, commercial, and residential development on the mesa. The flat mesa area of undeveloped lands is designated for various land uses under the adopted community plan. These undeveloped areas occur between the open space canyons of the southwestern area. The existing land use designation would allow for residential development similar to the established northwestern neighborhoods. To illustrate the existing visual character of the CPU area, a series of photographs are included as figures and described below. The locations of these photographs, as depicted in Figure 5.2-1, provide a visual inventory of the community's visual characteristics as seen from public viewing areas.

The northwest portion of the CPU area is characterized by residential subdivisions (including schools and parks) that consider the natural topography of the adjacent canyons and mesa tops. This area of the CPU is also characterized by successful vernal pool habitat restoration areas and open space canyon system, which connects to the Otay Valley Regional Park. Commercial uses for the CPU area are located within the western border at Palm Avenue adjacent to I-805. These recently constructed developments reflect siting and landscaping requirements. As shown in Figure 5.2-2, the residences are a maximum of three stories in height and are neutral-colored stucco structures with tiled roofs. The commercial area matches the residential color scheme

and architectural details, but includes large big-box retail structures and smaller restaurant and service-related structures in a sizable parking lot.

The CPU areas to the south of the western residential neighborhoods and along the northern CPU perimeter are characterized by undeveloped mesas and canyons (Figure 5.2-3). The flat mesas primarily contain grasslands while the canyons' steep slopes are covered with scrub vegetation. The open space area is also characterized by its extensive informal dirt trail network. Successful vernal pool restoration areas can be found in this portion of the CPU on land owned by the San Ysidro School District.

Except for some scattered rural residences and agricultural uses (greenhouses and fields), the eastern two-thirds of the CPU area is characterized by flat land occupied by Brown Field Airport, and industrial and commercial developments interspersed with vacant land. The majority of the undeveloped land has been previously graded and is currently vegetated with non-native grasslands.

Most of the industrial development is single-story warehousing, automobile recycling, and truck storage yards. The industrial warehouses are typically large monolithic structures surrounded by parking lots and manicured landscaping (Figure 5.2-4, Photograph 5). Truck storage facilities and the automobile salvage yards are cluttered and disorganized, though the public views of the storage areas are screened by slatted chain link fences and perimeter landscaping (Figure 5.2-4, Photograph 6). The commercial office and retail uses low-rise fueling stations and associated convenience stores and quick-dining establishments (Figure 5.2-5, Photograph 7). Commercial office character is generally illustrated by a two-story tan stucco office building with mirrored windows (Figure 5.2-5, Photograph 8). The overall character of the eastern portion of the CPU area is varied considering the contrasting features of the vacant grasslands, large boxy warehouses, field crops, formal office building, and cluttered vehicle storage yards.

The two major freeways that cross through the CPU area are SR-905 and SR-125. Views from the SR-905/SR-125 intersection consist primarily of roadside grass and scrub (Figure 5.2-6, Photograph 9). Views from the intersection of SR-905 and La Media Road show freeway use (Figure 5.2-6, Photograph 10).

Brown Field Airport, a major component of the CPU area, is not readily visible due to the flatness of the topography in the surrounding area. The airport includes large concrete runways but the airport towers are the most prominent visual feature of the airport because of their height (Figure 5.2-7, Photograph 11). The airport also includes large white or tan airplane hangars and airplanes.

Heavy trucks contribute to the character of the CPU area (Figure 5.2-7, Photograph 12). Numerous large trucks cross the border and travel to various truck storage and warehousing destinations throughout the CPU area before circling back to the POE or travel west along SR-905 to areas outside Otay Mesa.

Image source: SanGIS (flown May 2012)

MAIN ST
OTAY RIVER
DENNERY RD
PALM AVE
OCEAN VIEW HILLS PARKWAY
DENNERY CANYON
OTAY VALLEY RD
LONESTAR RD
AVIATOR RD
LA MEDIA RD
OTAY MESA RD
HARVEST RD
ENRICO FERMI DR
AIRWAY RD
CALIENTE AVE
OLD OTAY MESA RD
HERITAGE RD
CACTUS RD
BRITANNIA BLVD
SIEMPRE VIVA RD
MOODY CANYON
SPRING CANYON
BEYER BLVD
EAST BEYER BLVD
805
905
5
1
2
3
4
5
6
7
8
9
10
11
12
INTERNATIONAL BORDER
San Ysidro
Port of Entry
Otay Mesa
Port of Entry

0 Feet 2,500

Otay Mesa Community Plan Boundary

Photo Locations

FIGURE 5.2-1

Photo Location Map

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PHOTOGRAPH 1: On Ocean View Hills Parkway Looking Northeast



PHOTOGRAPH 2: On Spinnaker Point Terrace Looking West

FIGURE 5.2-2
Residential Areas



PHOTOGRAPH 3: At Southern Terminus of Caliente Avenue Looking South

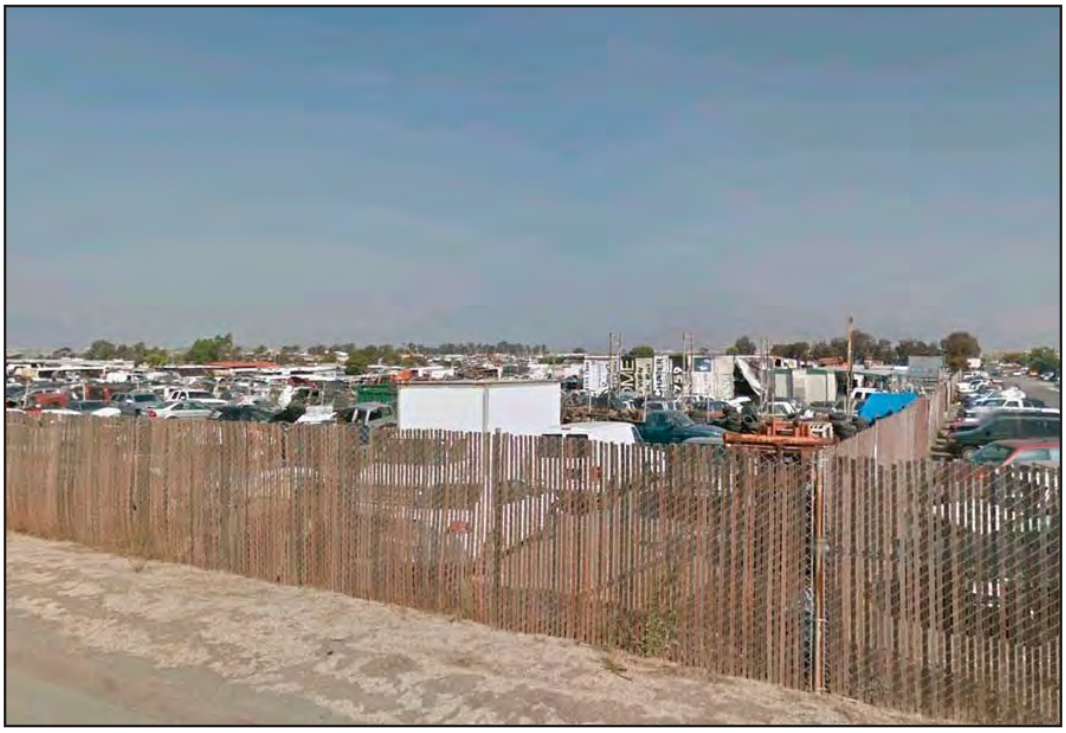


PHOTOGRAPH 4: At Southern Terminus of Heritage Road Looking South

FIGURE 5.2-3
Undeveloped Mesas and Canyons



PHOTOGRAPH 5: On Siempre Viva Road Looking North



PHOTOGRAPH 6: Datsun Street at Innovative Drive Looking East

FIGURE 5.2-4
Industrial Uses

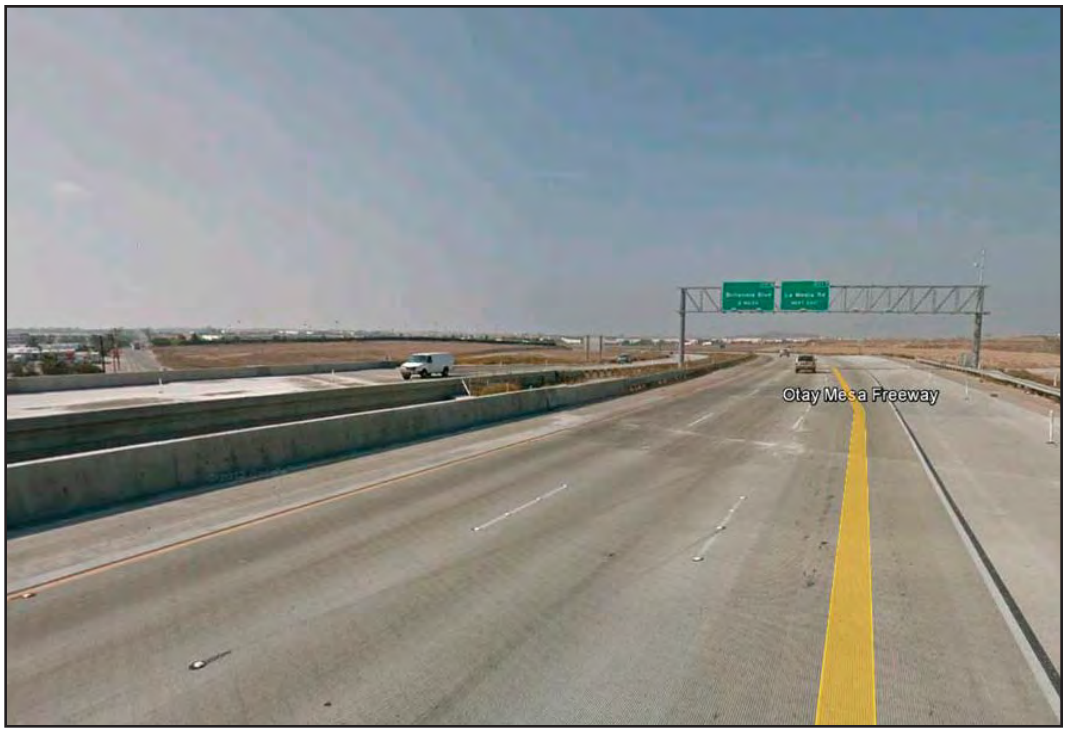


PHOTOGRAPH 7: On Otay Mesa Road Near Cactus Road Looking South

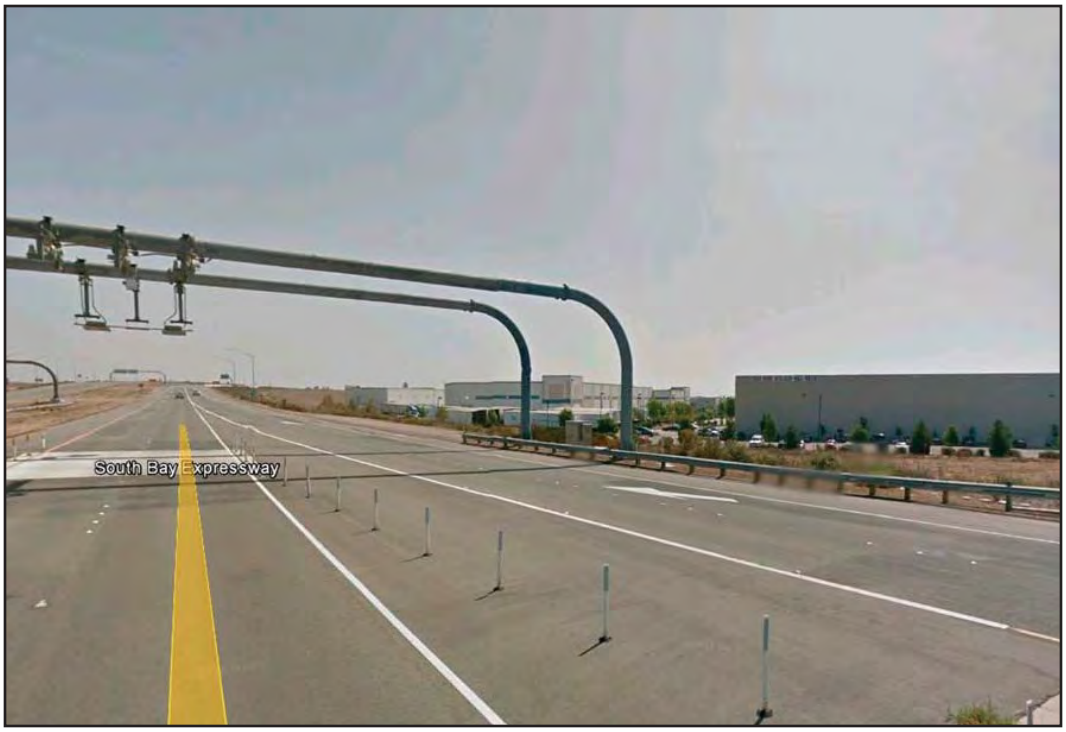


PHOTOGRAPH 8: Corporate Center Drive Looking Northwest

FIGURE 5.2-5
Commercial Uses

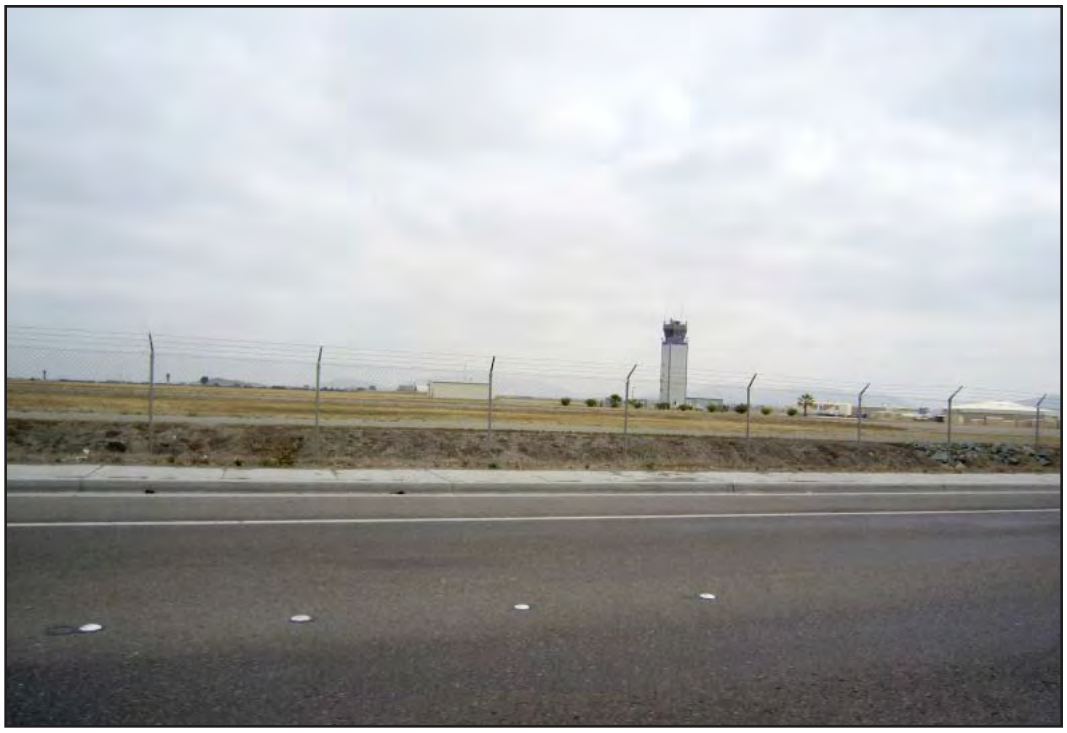


PHOTOGRAPH 9: On SR-905 at Airway Road Overpass Looking North



PHOTOGRAPH 10: On SR-125 East of Aviator Road Looking South

FIGURE 5.2-6
Freeways



PHOTOGRAPH 11: At Otay Mesa Road and Britannia Boulevard Looking North



PHOTOGRAPH 12: On Drucker Lane Looking North

FIGURE 5.2-7
Brown Field Airport and Heavy Trucks

5.2.1.2 Relevant Plans and Policies

Several local plans and ordinances provide pertinent visual quality and neighborhood character guidelines for development in the CPU area. These include the City's General Plan and the Land Development Code, specifically the steep hillside guidelines of the ESL.

a. San Diego General Plan

The Urban Design Element of the General Plan provides guidance for the development of village environments including high-quality public spaces, civic architecture, and the enhancement of visual quality. The Urban Design Element includes goals and policies specific to mixed-use villages and commercial areas that emphasize the integration of compatible land uses, the creation of transit-focused, walkable village centers, the provision of high-quality public spaces and civic architecture, and the enhancement of the visual quality of office and industrial development. The Urban Design Element also contains special design guidelines for development adjacent to natural landforms and open space. Relevant policies are included in Table 5.2-1.

TABLE 5.2-1
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-A.3.	Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development. a. Integrate development on hillside parcels with the natural environment to preserve and enhance views, and protect areas of unique topography. b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain. c. Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units or other alternatives to slab foundations to minimize the amount of grading. d. Consider terraced homes, stepped down with the slope for better integration with the topography to minimize grading in sensitive slope areas. e. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized. f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features. h. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas.

TABLE 5.2-1
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY
(continued)

Policy	Description
UD-A.3. (cont.)	i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy. j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. k. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. l. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas. m. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that respects open space resources.
UD-A.5.	Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context. a. Relate architecture to San Diego's unique climate and topography. b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character. c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. d. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to e. Add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest. f. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street. g. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.
UD-A.6.	Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
UD-A.12.	Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).
UD-A.14.	Design project signage to effectively utilize sign area and complement the character of the structure and setting.

SOURCE: City of San Diego General Plan Land Use and Community Planning Element 2008.

b. Land Development Code

The City's LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights, maximum lot coverage and floor area ratios, and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design.

c. ESL Regulations and Steep Hillside Guidelines

The LDC also contains development restrictions and guidelines to protect and enhance environmentally sensitive lands. The steep hillsides of the CPU area are subject to the provisions of the ESL Regulations and steep hillside guidelines of the LDC (Section 143.0101 et seq.). Steep hillsides are defined as those with gradients equal to or in excess of 25 percent and are at least 50 feet deep. Steep hillside grading encroachment allowances and design requirements are described further in Section 5.1 of this PEIR.

5.2.2 Significance Determination Thresholds

Based on the City's CEQA Significance Thresholds, impacts related to visual quality would be significant if the CPU would:

1. Result in blocking of public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyon, waterways);

2. Result in a severe contrast with the surrounding neighborhood character;

3. Result in a significant alteration of the natural landform; or

4. Result in the creation of a negative visual appearance.

5.2.3 Issue 1: Public Views

Would the CPU affect the visual quality of the area, particularly with respect to views from public viewing areas, vistas, or open spaces?

5.2.3.1 Impacts

a. Existing Public Views

No scenic roadways, scenic vistas, or scenic viewing areas are identified within the CPU area, in the General Plan or the adopted Otay Mesa Community Plan. A brief analysis of public viewing areas that exist but are not designated as such is provided below.

As discussed under the existing conditions, public views of the CPU area from outside the community are limited due to visual barriers. Existing informal gateways to the community that provide initial views include SR-905 and Palm Avenue/Ocean View Hills from the west, Heritage Road and SR-125 from the north, Otay Mesa Road from the east, and the Otay Mesa POE from the south. Implementation of the CPU would provide more formalized gateway locations and associated design guidelines. This formalization would result in improved visual quality and a cohesive community character. However, this change would not have impacts related to view blockage (refer to "Proposed Gateway Views" below). Once within the CPU area, public view points include public roadways, designated open space areas, and other public use areas (primarily schools and parks). The following identifies potential areas of visual concern:

- Public roadways within the CPU area provide views of the community. The CPU would result in additional development along the following major roads: Dennery Road, Del Sol Boulevard, Airway Road, Siempre Viva Road, Beyer Boulevard, and SR-905. Many of the areas identified for future development are not located on existing roadways and are not prominently located within public views.

- Future development on Dennery Road would include residences to the north side of the road between Red Coral Way and Black Coral Way. This would block the existing views of the hillside to the north that contains residences and patches of native scrub habitat. This location is not visible from OVRP due to topographic change.

- Del Sol Boulevard is only partially constructed. The current east and west termini of this roadway overlook open space and graded lots. The CPU would retain the open space and would allow for development on graded pads. Views of the open space native canyons would be preserved.

- Airway Road and Siempre Viva Road currently have views of industrial and commercial developments, vacant parcels with non-native grassland, greenhouses, and native habitat. The CPU would allow for development of the vacant lots and greenhouses into industrial and commercial uses that may block views of adjacent developed lots. The native habitat area would be preserved as open space and the public view of this area would remain.

- The CPU would allow for residential, commercial, and industrial developments along the mesas adjacent to SR-905 and would require preservation of the canyon areas. Buildout of the CPU would cause view blockages of the mesas between Ocean View Hills Parkway and Corporate Center Drive and view blockage of vacant and developed lots would occur in the industrial area.

- Both San Ysidro High School and Ocean View Hills Elementary School are located adjacent to Otay Mesa Road/SR-905 at the west end of the CPU area.

The current view of Moody Canyon from Ocean View Hills would be preserved, as it would be designated open space under the CPU. However, the view from San Ysidro High School of the mesas to the south would be replaced with the Southwest Specific Plan area and views of Spring Canyon would be blocked.

- Several neighborhood parks exist within the Northwest District. The views from these parks primarily consist of adjacent residences, roadways, and Dennery Canyon. Dennery Canyon is a visual resource. The CPU would preserve Dennery Canyon and no view blockage of the canyon would occur from the parks.

- Informal trails that provide public views are located within the open space areas. As discussed under existing conditions, views from the canyon trails are limited to the canyons while mesa views exist until interrupted by structures or an increase in topography. The CPU would preserve a significant amount of the existing open space (see Figure 3-2) where these trails are located. Since the CPU would formally designate view corridors through open space and preserve the open space where most of these trails are located, minimal view blockage would occur.

In summary, visual resources in the CPU area include open mesas and canyons. While not designated as scenic roadways, vistas, or viewing areas, the majority of the existing views of canyons and mesas would be preserved under the CPU and impacts would therefore be less than significant.

b. Proposed Public Views

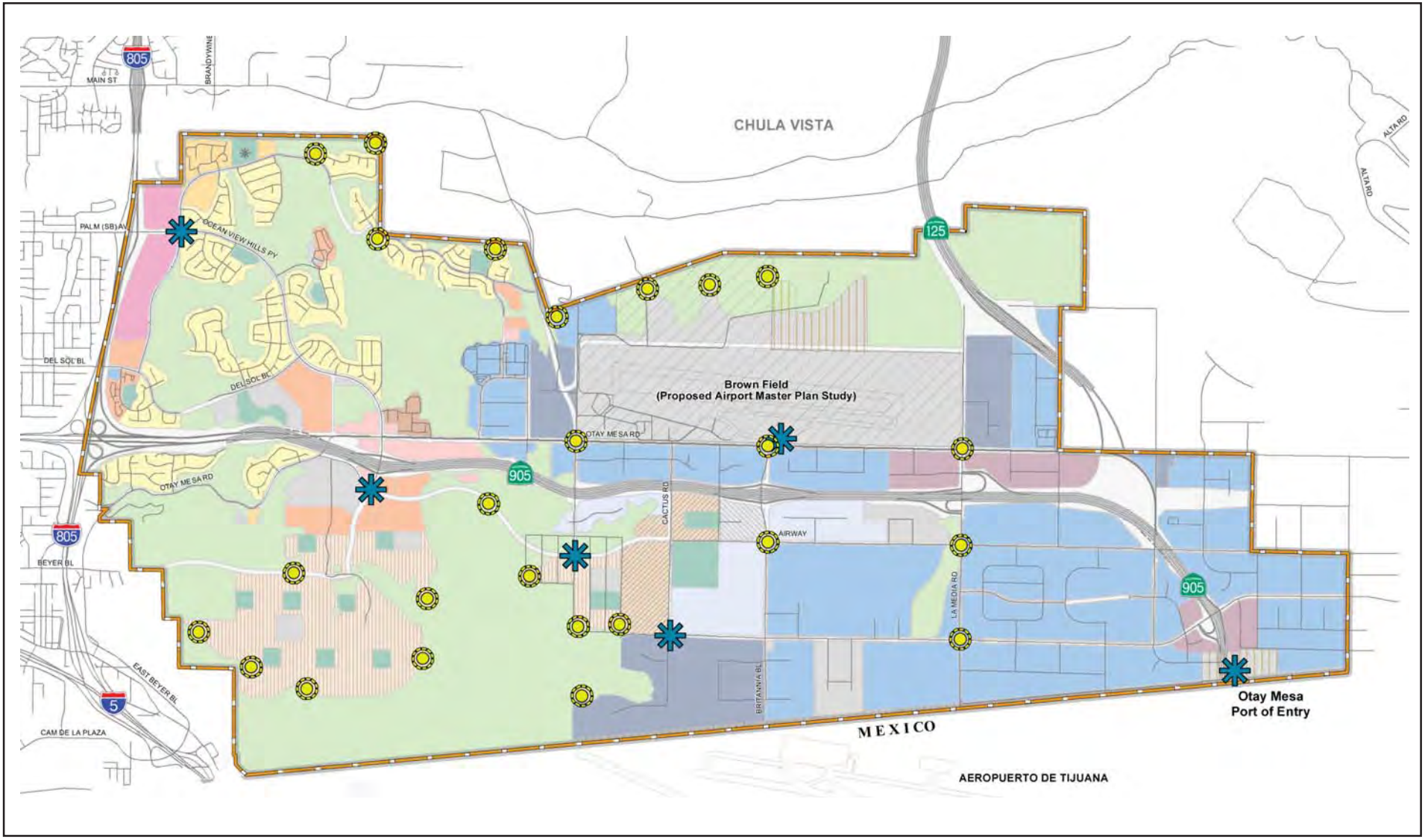
The CPU Urban Design Element identifies 25 view corridors and ten gateways (Figure 5.2-8).

The CPU contains Urban Design Policies 4.12-1 through 4.12-4 that pertain to the view corridors and gateways. Policy 4.12-1 would require the protection and enhancement of view corridors and integration of these corridors with parks, trail staging areas, and open space, where appropriate. The series of gateway policies (4.11-1 through 4.11-4) indicate gateways are to include public art and are required to match the district landscaping and street designs. These policies would provide implementation methods to ensure that the designated view corridors and gateways would be protected.

View Corridors

The view corridors would be grouped into four main categories: View Corridors of OVRP, View Corridors of Spring Canyon, View Corridor of Moody Canyon, and View Corridors through Industrial/Commercial Land. View Corridors of OVRP would be located along the northern portion of the CPU area on the edge of existing/planned development and

Map Source: City of San Diego



0 Feet 4,000

Community Plan Boundary
Gateway
ViewCorridor

AIR - HATCH
BUSINESS PARK
BUSINESS PARK - RESIDENTIAL
COMMUNITY COMMERCIAL - NO RESIDENTIAL
COMMUNITY VILLAGE
HEAVY COMMERCIAL
HEAVY INDUSTRIAL
INSTITUTIONAL
LIGHT INDUSTRIAL
LOW
LOW MEDIUM
MEDIUM
MEDIUM HIGH
NEIGHBORHOOD COMMERCIAL
NEIGHBORHOOD VILLAGE
OFFICE COMMERCIAL
OPEN SPACE
PARKS
REGIONAL COMMERCIAL - NO RESIDENTIAL
RIGHT-OF-WAY
SCIENTIFIC RESEARCH
SPECIAL AIRPORT POLICY AREA
SPECIAL AIRPORT STUDY AREA
TECHNOLOGY PARK
URBAN VILLAGE
VERY LOW
VISITOR COMMERCIAL

FIGURE 5.2-8

Proposed View Corridors and Gateways

the OVRP open space area. The OVRP encompasses the low-lying riparian valley along the Otay River and its tributary canyons, including a portion of Dennery Canyon within the CPU northwest area. The CPU would retain the open space designation over the OVRP and Dennery Canyon areas within its jurisdiction.

View Corridors of Spring Canyon are proposed along the edges of Southwest Specific Plan area, Old Otay Mesa Road, the Central Village, and the heavy industrial area adjacent to Spring Canyon. These overlook views of Spring Canyon include existing informal trails and roadways, mesas with non-native grasslands, and scrub canyons. The CPU would retain Spring Canyon as open space and include a trail system.

The View Corridor of Moody Canyon would be located along the future alignment for Beyer Boulevard. Moody Canyon includes flat non-native grasslands cut by scrub canyons and has an extensive existing informal trail network. The CPU would retain Moody Canyon as open space land.

View corridors through Industrial/Commercial Land are proposed at intersections along Otay Mesa Road, Airway Road, Britannia Boulevard, and La Media. The view corridors along these roadways would primarily include developed industrial land and undeveloped parcels with non-native grasslands. View corridors along La Media would also include native scrub habitat to the west. The CPU would allow for development of the parcels with non-native grasslands into industrial uses and potentially a school to the west of Britannia Boulevard. The native habitat to the west of La Media would be designated as open space.

Since the canyon view corridors look out over designated open space and MHPA areas, these areas would remain undeveloped and the view corridors would be preserved upon implementation of the CPU. The urban view corridors would also be maintained as they are located in City right-of-ways along roadways adjacent to areas designated for development.

Gateway Views

Pursuant to CPU Urban Design Policy 4.11-4, gateways would be provided at the following locations:

- District gateways
- Ocean View Hills Parkway – I-805 freeway
- Ocean View Hills Parkway and Otay Mesa Road
- Caliente Avenue – SR-905 interchange
- Otay Mesa POE
- South Bay Express/SR-125 – Lonestar Road interchange
- Main entrance to Brown Field Airport
- Eastern and western Airway Road entrances
- Future core areas of Southwest and Central Villages
- Grand Park

Gateways are intended to provide a sense of place and would be demarcated with prominent public art or cultural amenities, signage, landscaping, and other streetscape elements. The Ocean View Hills neighborhood includes large monument signs on the southeast and northeast corners near the I- 805 gateway. Also, the Otay Mesa POE currently contains cultural statues. The remaining proposed gateway areas do not currently contain community identification features, but the CPU implementation would allow for them to be designed and sited in these areas.

The CPU would allow for development and land use changes at several of the proposed community gateways. While this would result in some view blockage of the gateway areas, the visual importance of gateways would be tied to a localized area, not a long-range view. The gateways would be located along City roadways, and therefore, localized public views of these areas would be maintained with CPU implementation.

5.2.3.2 Significance of Impacts

Visual resources in the CPU area include open mesas and canyons. Existing public view points include roadways, schools, and parks. The majority of the existing public views of canyons and mesas would be preserved under the CPU. To prevent impacts to views of public resources, the CPU has been designed to include designated view corridors and gateways. Also, the CPU includes policies and project design features to implement the proposed view corridors and gateways. With the inclusion of these project design features, view blockage impacts would be less than significant.

5.2.3.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.2.3.4 Significance After Mitigation

Impacts would be less than significant.

5.2.4 Issue 2: Compatibility

Would the CPU's land use changes be compatible with surrounding development in terms of bulk, scale, materials, or style? Would adverse aesthetic impacts result from the CPU?

5.2.4.1 Impacts

The CPU would allow for the development of two-thirds of the area and would require the preservation of the remaining area as open space. The allowed uses would include a mix of residential, public park, open space, institutional, commercial, and industrial

land uses and roadways. The CPU area is visually separated into five distinct areas that correspond to the CPU districts; the northwest neighborhood, southwest neighborhood, the SR-905 corridor, Brown Field Airport area, and the South District (southeastern industrial area). The City's General Plan, LDC, and CPU Urban Design Element include design guidelines that would guide the bulk, scale, materials and style of future development in the CPU area. Specifically, CPU Urban Design Policies 4.3-3 through 4.3-7 pertain to general architecture and landscape. The CPU also includes individual guidance for the aesthetic development of each District. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element of the OMCP would be subject to review in accordance with CPIOZ Type A. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B. Both processes are further described in Section 3.0, Project Description.

a. Northwest District

The Northwest District would include regional commercial, single-, and multi-family residential uses, parks, and a school. This district is currently largely built out with these uses. Undeveloped areas are designated as low to medium density residences located to the north of Dennery Road; four parks scattered through the community; high density residences, community commercial and institutional uses to the south of Del Sol Boulevard; community commercial south of Otay Mesa Road adjacent to SR-905; and a low-medium density residential development to the south of Otay Mesa Road.

These areas proposed for development are already graded and the existing graded lots are not visually sensitive. Development of these graded areas would improve their visual compatibility with the surrounding areas. Therefore, implementation of the Northwest District plan would not result in visually incompatibility with the CPU area or have an adverse aesthetic impact to the community.

b. Southwest District

The current visual landscape of the southwest portion of the CPU area is characterized by undeveloped mesas with non-native grasslands, transected by the densely vegetated Spring and Moody canyons. The canyons of the southwest portion of the CPU area are located within designated MHPA land.

Compared to existing conditions, buildout of the Southwest District pursuant to the CPU would result in a substantial change from its current visual character. The change from undeveloped mesa and canyons to an urbanized, built environment on the mesa surrounded by natural open space would be a potentially significant impact. Goals, policies, and design guidelines contained in the General Plan and in the CPU would serve to avoid visual impacts of future CPU development in relation to surrounding

natural open space. The Urban Design Element of the General Plan contains citywide policies which address development adjacent to natural features (Policies UD-A.2 and 3). The CPU includes Policy Recreation Element 7.1-7e suggesting the placement of parks between open space and development as a means to reduce visual inconsistency. Additionally, CPU Conservation Element Policy 8.1-3 requires development to minimize grading and retain the natural topography. Future development's compliance with existing and proposed visual quality guidelines would ensure that natural open space areas adjacent to the CPU area would not be adversely affected.

SR-905 Corridor (Central District)

Along the SR-905 corridor south of Brown Field, lands are currently occupied by undeveloped, industrial, and commercial uses, with scattered rural residences (see Figure 5.1-1). The CPU would allow for the development of a mixed-use (residential/commercial) central village, park, school (Southwestern College), business park, and industrial uses within this district.

In terms of visual character, the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor would transition over the next 30 years to a more urbanized, cohesive environment. The visual character of the district would transition from existing low-rise, single-use structures and blocks, to vertically and horizontally mixed-use structures and blocks. Under the CPU, the resulting building mass, scale, and heights would be those characteristic of medium-high density mixed-use, transit-focused development, with building heights ranging from three to four stories up to a maximum of six stories.

Various goals and policies of the General Plan and CPU would serve to avoid adverse aesthetic impacts. The General Plan Land Use, Urban Design, and Mobility Elements contain relevant citywide policies to address land use compatibility, including Policy UD-A.5. The LDC also includes specific guidelines pertaining to height, bulk, and scale. The CPU Urban Design Element includes development guidance pertaining to streetscape, building character, and design to avoid adverse visual impacts. Future development's projects compliance with visual quality guidelines would ensure that visual impacts of the CPU would not be incompatible with surrounding development.

Airport District

The CPU would continue industrial and commercial uses for the areas directly surrounding Brown Field, within the airport flight activity zone. While these uses would continue in the Airport District, the future visual quality of these areas would likely transition to a more organized and aesthetically pleasing visual appearance than currently exists. Automobile dismantling uses concentrated west of Brown Field, along Heritage Road, currently operate under CUPs. Upon their expiration, it is likely that these areas would eventually revert to permitted land uses and would comply with the

General Plan, LDC, and CPU. Additional airport-related development would occur to the north of the airport and may include an aviation museum, general/corporate aviation and industrial park. With compliance to the design goals and policies of the General Plan and CPU, as well as the MHPA Land Use Adjacency Guidelines, visual quality, and compatibility impacts would be less than significant in this district.

Southeastern Industrial Area (South District)

The southeastern area of the CPU located just north of Mexico is currently developed with industrial, agricultural, and commercial uses. Vacant lots with non-native grassland and open space areas with native and non-native habitats are scattered throughout the district. Implementation of the CPU would result in the development of vacant parcels into industrial uses and the conversion of agricultural uses to industrial uses. Industrial uses are anticipated to be large warehouse-type structures and automotive lots similar to those existing in the area. The western portion of this district within Spring Canyon and a corridor along La Media would be preserved as open space. Implementation of the CPU would result in the continuation of the industrial character of the area, albeit further intensified. The CPU would not result in significant visual impacts or incompatibilities, given adherence of future development to relevant citywide policies and CPU policies.

5.2.4.2 Significance of Impacts

Through implementation of the CPU, the visual character of the CPU area would become more urbanized. Being largely built out, the Northwest District would continue to be a predominantly residential area with buildings ranging from one to three stories. Contrastingly, the Southwest District is mostly undeveloped mesas with non-native grasslands that would be converted to urban uses. This would represent a change in character. The Central District is already developed with industrial and agricultural uses. Both the Airport District and the South District are also already developed with industrial uses and the CPU would allow for further intensification of these uses. Therefore, the proposed intensification of uses is not considered a significant change to the visual character in these areas.

The land use and development design guidelines and policies in the CPU are intended to ensure that development within the CPU area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. Future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and CPU. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element of the OMCP would be subject to review in accordance with CPIOZ Type A. Development proposals that do

not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B. Therefore, impacts would be less than significant.

5.2.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.2.4.4 Significance After Mitigation

Impacts would be less than significant.

5.2.5 Issue 3: Landform Alteration

Would the CPU result in a substantial change to natural topography or other ground surface relief feature?

5.2.5.1 Impacts

Specific grading quantities associated with future development in accordance with the CPU land uses are presently unknown. It can be generally concluded, however, that future development would entail grading in quantities that would exceed the City's threshold of 2,000 cubic yards per graded acre. In order to determine whether these grading quantities would result in a significant impact to landform, one of four conditions must be met. The first condition is that project grading must disturb steep hillsides in excess of the encroachment allowances of the ESL Regulations and Steep Hillside Guidelines. ESL compliance is discussed further in Section 5.1.5.2. Steep hillside encroachments may occur at locations where future development adjoins the Spring, Moody, and Dennery Canyon systems. In addition to steep hillside encroachments, it is also possible that future development in accordance with the CPU would create manufactured slopes higher than 10 feet, and/or fill slopes that exceed 5 feet in height, thus exceeding the second and third grading significance thresholds as well.

According to Section 143.0142 of the ESL, Steep Hillside Guidelines, development is only permitted in hillsides when necessary to achieve a maximum development area of 25 percent. In addition, the City's Significance Determination Thresholds state that grading would not be considered significant if one or more of the following conditions apply:

- The proposed grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms would very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through naturalized, variable slopes.

- The proposed grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.
- The proposed excavation of fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

As future development proposals come forward pursuant to the CPU, they would be reviewed to determine whether the grading plans demonstrate compliance with the above criteria or if alternative design features are required. Future projects would be required to demonstrate compliance with landform grading guidelines contained in the City Grading Regulation, ESL Regulations, and Steep Hillside Guidelines of the LDC. Additionally, CPU Conservation Element Policy 8.1-3 encourages development to minimize grading and relate to the topography and natural features of the CPU area. Application of these regulatory and guidance documents would ensure that impacts associated with changes to natural topography of the CPU area would be less than significant at the program-level.

5.2.5.2 Significance of Impacts

Future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and CPU. Therefore, impacts would be less than significant.

5.2.5.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.2.5.4 Significance After Mitigation

Impacts would be less than significant.

5.2.6 Issue 4: Unique Physical Features

Would the CPU 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?

5.2.6.1 Impacts

As discussed above in the Issue 3 analysis, future grading associated with implementation of the CPU and infrastructure improvements would involve grading and modification of steep hillsides (slopes with gradients in excess of 25 percent) contained within the natural canyon areas. As described further in Section 5.1.5 of this PEIR, future projects implemented in accordance with the CPU would be required to comply with the goals and policies of the General Plan pertaining to the preservation and enhancement of natural landforms, including canyons and steep hillsides. The General Plan Conservation Element indicates that ESL regulations shall be enforced to limit grading and alteration of steep hillsides to prevent landform impacts and preserve the City's form. The CPU includes Conservation Element Policies 8.1-1 through 8.1-3 related to landform alteration. These policies require the implementation of the ESL regulations related to biological resources and steep hillsides for all new development. Additionally, future projects implemented in accordance with the CPU would be required to preserve a network of open and relatively undisturbed canyons and relate to the topography and natural features of the CPU area.

The ESL regulation prohibits development that encroaches into steep hillsides within the MHPA. For areas outside of the MHPA, the ESL allows development of steep hillsides only when necessary to achieve a maximum development area of 25 percent of the premises. Development consistent with the CPU has the potential to encroach into ESL steep hillsides and exceed ESL encroachment allowances resulting in modification of unique physical features within the CPU area. However, future projects' compliance with the City's Grading Regulations, General Plan, and CPU policies would ensure that impacts associated with the modification of unique physical features would be less than significant.

5.2.6.2 Significance of Impacts

Future development would be required to comply with the City's relevant land use and development regulations, ESL regulations, and policies of the General Plan and proposed CPU. Therefore, impacts would be less than significant.

5.2.6.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.2.6.4 Significance After Mitigation

Impacts would be less than significant.

5.3 Air Quality/Odor

This analysis is based on the air quality report prepared by RECON to analyze the air quality emissions that potentially could result from implementation of the CPU (RECON, February 2013). The report also addresses air quality impacts resulting from vehicle exhaust on newly designated residential development in the CPU. This report is included as Appendix C of this PEIR.

5.3.1 Existing Conditions

5.3.1.1 Climate

The CPU area is located in the SDAB about 6 miles east of the Pacific Ocean. The City of San Diego covers approximately 330 square miles of the 4,260-square-mile basin. The eastern portion of the SDAB is surrounded by mountains to the north, east, and south. These mountains tend to restrict airflow, prohibiting dispersal of pollutants and helping to trap and concentrate pollutants in the valleys and low-lying areas below in inversion layers.

The CPU area, like the rest of San Diego County's coastal areas, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The mean annual temperature for the project area is 62 degrees Fahrenheit (°F). The average annual precipitation is 12 inches, falling primarily from November to April. Winter low temperatures in the project area average about 41°F, and summer high temperatures average about 78°F. The average relative humidity is 69 percent and is based on the yearly average humidity at Lindbergh Field (Western Regional Climate Center [WRCC 2012]).

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the SDAB. Beneath the inversion layer pollutants become "trapped" as their ability to disperse diminishes. The mixing depth is the area under the inversion layer. Generally, the morning inversion layer is lower than the afternoon inversion layer. The greater the change between the morning and afternoon mixing depths, the greater the ability of the atmosphere to disperse pollutants.

Throughout the year, the height of the temperature inversion in the afternoon varies between approximately 1,500 and 2,500 feet AMSL. In winter, the morning inversion layer is about

800 feet AMSL. In summer, the morning inversion layer is about 1,100 feet AMSL. Therefore, air quality generally tends to be better in the winter than in the summer.

The prevailing westerly wind pattern is sometimes interrupted by regional “Santa Ana” conditions. A Santa Ana occurs when a strong high pressure system develops over the Nevada-Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds from the east over the mountains and out to sea.

Strong Santa Anas tend to blow pollutants out over the ocean, producing clear days. However, at the onset or during breakdown of these conditions, or if the Santa Ana is weak, local air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin (including Los Angeles) to the north are blown out over the ocean, and low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterly winds reassert themselves and send this cloud of contamination ashore in the SDAB. When this event does occur, the combination of transported contaminants from Los Angeles and Mexico, in addition to locally produced contaminants, produces the worst air quality measurements recorded in the basin.

5.3.1.2 Regulatory Plans and Policies

a. Federal Regulations

Ambient Air Quality Standards (AAQS) represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation’s air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. EPA developed primary and secondary National Ambient Air Quality Standards (NAAQS). The NAAQS require that certain pollutants should not exceed specified levels. Areas that exceed the standard for specified pollutants are designated “non-attainment areas”.

Six pollutants of primary concern were designated: ozone (O_3), carbon monoxide (CO), sulfur dioxide, nitrogen dioxide (NO_2), lead (Pb), and respirable particulate matter (PM_{10} and $PM_{2.5}$). The primary NAAQS “. . . in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health . . . .” and the secondary standards “. . . protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air” (42 USC 7409(b)(2)). The primary standards were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties).

The current federal AAQS are presented in Table 5.3-1. The SDAB is a non-attainment area for the federal 8-hour ozone standard. The SDAB has recently attained the 1997 ozone standard and California Air Resources Board (CARB) is now in the process of filing a petition to the U.S. EPA to redesignate the region.

b. State Regulations

The U.S. EPA allows states the option to develop different (stricter) standards. The State of California generally has set more stringent limits on the criteria pollutants (see Table 5.3-1), and both federal and state standards must be met in California. The California Clean Air Act (CCAA), also known as the Sher Bill, or Assembly Bill 2595 (AB 2595), became effective on January 1, 1989. The CCAA requires that districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures. The California CAA requires that a district must (South Coast Air Quality Management District [SCAQMD] 2007):

- Demonstrate the overall effectiveness of the air quality program;
- Reduce non-attainment pollutants at a rate of five percent per year, or include all feasible measures and expeditious adoption schedule;
- Ensure no net increase in emissions from new or modified stationary sources;
- Reduce population exposure to severe non-attainment pollutants according to a prescribed schedule;
- Include any other feasible controls that can be implemented, or for which implementation can begin, within 10 years of adoption of the most recent air quality plan; and
- Rank control measures by cost-effectiveness.

The SDAB is a non-attainment area for the state ozone standards, the state PM_{10} standard, and the state $PM_{2.5}$ standard.

c. Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

TABLE 5.3-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[1]		Federal Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	15 µg/m^3		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m^3)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[8]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[9]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Fluorescence; Spectro photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[9]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[9]	–	
Lead[10,11]	30 Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[11]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m^3		
Visibility Reducing Particles[12]	8 Hour	See footnote 12	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chroma-tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[10]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chroma-tography			

See footnotes on next page.

TABLE 5.3-1
AMBIENT AIR QUALITY STANDARDS
(continued)

SOURCE: State of California 2012a.

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; – = not applicable.

[1]California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2]National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[3]Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4]Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

[5]National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6]National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7]Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the U.S. EPA.

[8]To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.

[9]On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[10]The ARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[11]The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[12]In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

Of particular concern statewide are diesel-exhaust particulate matter (DPM) emissions. DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the state's Proposition 65 or under the federal Hazardous Air Pollutants program. Diesel emissions generated within the CPU area and the surrounding areas pose a potential hazard to residents and visitors.

Following the identification of diesel particulate matter as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from diesel particulate matter. The overall strategy for achieving these reductions is found in the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (CARB 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to diesel particulate matter 85 percent by 2020.

A number of programs and strategies to reduce diesel particulate matter that have been implemented or are in the process of being developed include (CARB 2010a):

- **The Carl Moyer Memorial Air Quality Standards Attainment Program:** This program, administered by CARB, was initially approved in February 1999 and provides incentive grants to cover an incremental portion of the cost of upgrading to cleaner-than-required engines, equipment, and other sources of pollution providing early or extra emission reductions. Eligible projects include cleaner on-road, off-road, marine, locomotive, and agricultural sources. The program guidelines are revised regularly (most recently in April 2011).

- **On-road Heavy-duty Diesel Engine Reduced Emission Standards**: This rule reduces emission standards for 2007 and subsequent model year heavy-duty diesel engines (66 Federal Register [FR] 5002, January 18, 2001).

- **On-road Heavy-duty Diesel Engine In-use Compliance Program**: This program requires in-use compliance testing to ensure that existing vehicles/engines meet applicable emission standards throughout their useful life.

In April 2005, CARB published *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB Handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of

pertinence to this study, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

As an ongoing process, CARB will continue to establish new programs and regulations for the control of diesel particulate emissions as appropriate. The continued development and implementation of these programs and policies will ensure that the public exposure to diesel particulate matter will continue to decline.

d. State Implementation Plan (SIP)

A State Implementation Plan (SIP) is a plan for each state which identifies how that state will attain and/or maintain the primary and secondary NAAQS as identified in section 109 of the CAA and 40 Code of Federal Regulations (CFR) 50.4 through 50.12, which includes federally enforceable requirements. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The CARB is the lead agency for all matters related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. The CARB then forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the CFR at 40 CFR 52.220.

The San Diego Air Pollution Control District (SDAPCD) is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SDAPCD adopts rules, regulations, and programs to attain state and federal air quality standards, and appropriates money (including permit fees) to achieve these objectives.

e. Regional Air Quality Strategy (RAQS)

The SDAPCD is the agency that regulates air quality in the SDAB. The SDAPCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to the requirements set forth in AB 2595. The draft was adopted, with amendments, on June 30, 1992 (County of San Diego 1992). Attached, as part of the RAQS, are the Transportation Control Measures (TCMs) for the air quality plan prepared by SANDAG in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum. The required triennial updates of the RAQS and corresponding TCMs were adopted in 1995, 1998, 2001, 2004, and 2009. The RAQS and TCMs set forth the steps needed to accomplish attainment of the CAAQS.

5.3.1.3 Existing Air Quality

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors

affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the CARB or federal standards set by the U.S. EPA. The SDAPCD maintains 11 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these 11 stations. Measurements are then used by scientists to help forecast daily air pollution levels. Table 5.3-2 summarizes the number of days per year during which state and federal standards were exceeded in the SDAB overall during the years ~~2007~~ 2008 to ~~2011~~2012. The Otay Mesa—Paseo International monitoring station, located in the southeastern portion of the CPU area, and the Otay Mesa—Richard J. Donovan Correctional Facility monitoring station, located east of the CPU area, are the nearest stations. Figure 5.3-1 shows the locations of these monitoring stations. As shown, the Otay Mesa monitoring station is located at the U.S.–Mexico border. Air pollutant measurements taken at the Otay Mesa monitoring station include the air pollutants originating in Tijuana.

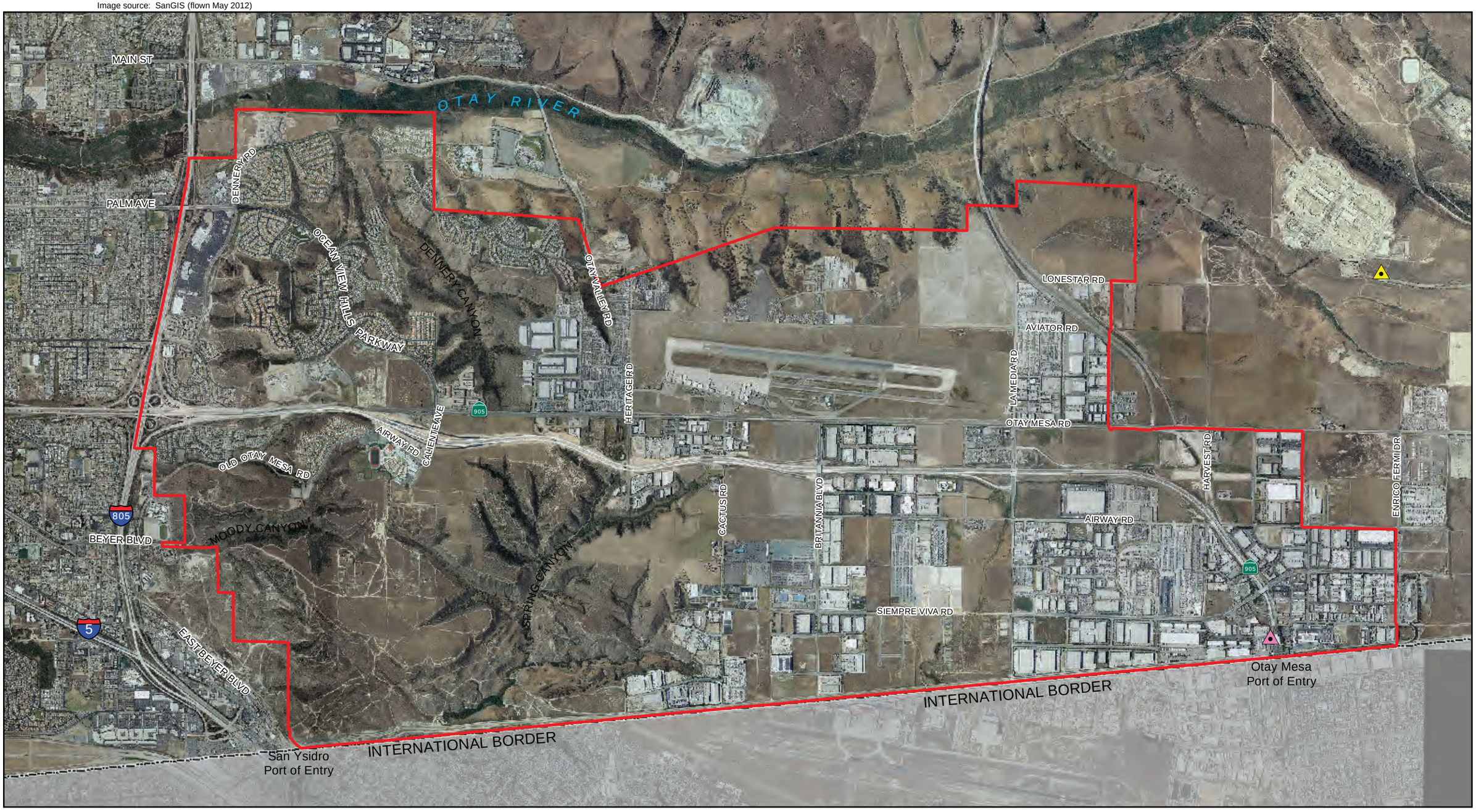
Table 5.3-3 provides a summary of measurements of ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM_{10} collected at the Otay Mesa monitoring stations for the years ~~2007~~ 2008 through ~~2011~~2012.

a. Ozone

Nitrogen oxides and hydrocarbons (reactive organic gases [ROGs]) are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone. Ozone is the primary air pollution problem in the SDAB. Because sunlight plays such an important role in its formation, ozone pollution, or smog, is mainly a concern during the daytime in summer months. The SDAB is currently designated a federal and state non-attainment area for ozone. During the past 20 years, San Diego has experienced a decline in the number of days with unhealthy levels of ozone despite the region’s growth in population and vehicle miles traveled (County of San Diego 2010). As noted in Section 5.3.1.2, the SDAB has recently attained the 1997 ozone standard and CARB is now in the process of filing a petition to the U.S. EPA to redesignate the region.

Locally, about three-quarters of smog-forming emissions come from motor vehicles and mobile equipment powered by internal combustion engines (County of San Diego 2009a). Population growth in San Diego has resulted in a large increase in the number of automobiles expelling ozone-forming pollutants while operating on area roadways. In addition, the occasional transport of smog-filled air from the SCAB only adds to the SDAB’s

Image source: SanGIS (flown May 2012)



0 Feet 2,500

Otay Mesa Community Plan Boundary

Air Quality Monitoring Station

- Donovan
- Otay Mesa-Paseo International

FIGURE 5.3-1

Air Quality Monitoring Stations

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TABLE 5.3-2
AMBIENT AIR QUALITY SUMMARY – SAN DIEGO AIR BASIN

Pollutant	Average Time	California Ambient Air Quality Standards[a]	Attainment Status	National Ambient Air Quality Standards[b]	Attainment Status[c]	Maximum Concentration					Number of Days Exceeding State Standard					Number of Days Exceeding National Standard				
						2008	2009	2010	2011	2012	2008	2009	2010	2011	2012	2008	2009	2010	2011	2012
O_3	1 hour	0.09 ppm	N	N/A	N/A	0.139	0.119	0.107	0.114	0.101	18	8	7	5	2	2	0	0	0	0
O_3	8 hours	0.07ppm	N	0.075 ppm	N	0.110	0.098	0.088	0.093	0.084	69	47	21	33	25	35	24	14	10	10
CO	1 hour	20 ppm	A	35 ppm	A	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na
CO	8 hours	9 ppm	A	9 ppm	A	3.51	3.24	2.46	2.44	3.70	0	0	0	0	0	0	0	0	0	0
NO_2	1 hour	0.18 ppm	A	0.100 ppm[d]	A	0.123	0.091	0.091	0.100	0.077	0	0	0	0	0	--	--	--	--	--
NO_2	Annual	0.030 ppm	A	0.053 ppm	A	0.015	0.016	0.013	0.013	0.020	NX	NX	NX	NX	NX	NX	NX	NX	NX	NX
SO_2	1 hour	0.25 ppm	A	0.075 ppm	A	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na
SO_2	3 hours	N/A	N/A	N/A	N/A	Na	Na	Na	Na	Na	--	--	--	--	--	--	--	--	--	--
SO_2	24 hours	0.04 ppm	A	N/A	N/A	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	--	--	--	--	--
PM_{10}	24 hours	50 $\mu g/m^3$	N	150 $\mu g/m^3$	U	158.0	126.0	108.0	126.0	126.0	30/ 163.4*	25/ 146.4*	22/ 136.0*	23/ 138.5	6/6.1	1/6.1*	0/0.0*	0/0.0*	0/0*	0/Na*
PM_{10}	Annual	20 $\mu g/m^3$	N	N/A	N/A	56.1	53.9	47.0	46.2	24.3	EX	EX	EX	EX	EX	--	--	--	--	--
$PM_{2.5}$	24 hours	N/A	N/A	35 $\mu g/m^3$	A	44.0	78.4	52.2	69.8	70.7	--	--	--	--	--	3.5	3.4	2.0	3.0	2.0
$PM_{2.5}$	Annual	12 $\mu g/m^3$	N	15 $\mu g/m^3$	A	14.9	12.2	10.8	10.9	Na	EX	EX	NX	NX	Na	NX	NX	NX	NX	NX

NOTE: Table has been updated to show data from 2008 to 2012. For ease of viewing, strikeout/underline has been removed.

SOURCE: State of California ~~2011a~~2013; U.S. EPA ~~2011a~~2013.

*Measured Days/Calculated Days—Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. Particulate measurements are collected every six days. The number of days above the standard is not necessarily the number of violations of the standard for the year.

[a]California standards for ozone, carbon monoxide (except at Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and PM_{10} are values that are not to be exceeded. Some measurements gathered for pollutants with air quality standards that are based upon 1-hour, 8-hour, or 24-hour averages, may be excluded if the CARB determines they would occur less than once per year on average.

[b]National standards other than for ozone and particulates, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The 1-hour ozone standard is attained if, during the most recent 3-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one.

[c]A = attainment; N = non-attainment; U = Unclassifiable

N/A = not applicable; Na = data not available; NX = annual average not exceeded; EX = annual average exceeded.

ppm = parts per million, pphm = parts per hundred million, $\mu g/m^3$ = micrograms per cubic meter.

[d]Secondary Standard.

TABLE 5.3-3
SUMMARY OF AIR QUALITY MEASUREMENTS RECORDED AT THE OTAY MESA MONITORING STATIONS

Pollutant/Standard	2008	2009	2010	2011	2012
OTAY MESA—PASEO INTERNATIONAL MONITORING STATION					
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	2	1	0	1	0
Days State 8-hour Standard Exceeded (0.07 ppm)	3	0	0	1	0
Days Federal 1-hour Standard Exceeded (0.12 ppm)	0	0	0	0	0
Days '97 Federal 8-hour Standard Exceeded (0.08 ppm)	1	0			
Days '08 Federal 8-hour Standard Exceeded (0.075 ppm)	2	0			
Max. 1-hr (ppm)	0.099	0.098	0.076	0.095	0.08
Max 8-hr (ppm)	0.089	0.068	0.068	0.076	0.06
Carbon Monoxide					
Days State 1-hour Standard Exceeded (20 ppm)	0	0	Na	Na	Na
Days State 8-hour Standard Exceeded (9 ppm)	0	0	0	0	Na
Days Federal 1-hour Standard Exceeded (35 ppm)	0	0	Na	Na	Na
Days Federal 8-hour Standard Exceeded (9 ppm)	0	0	0	0	Na
Max. 1-hr (ppm)	4.60	4.60	Na	Na	Na
Max. 8-hr (ppm)	3.51	3.06	2.21	Na	Na
Nitrogen Dioxide					
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Max 1-hr (ppm)	0.123	0.091	0.091	0.100	0.077
Annual Average (ppm)	0.024	0.021	0.021	0.020	0.020
Sulfur Dioxide					
Days State 24-hour Standard Exceeded (0.04 ppm)	0	0	0	0	Na
Max. Daily (ppm)	0.008	0.008	0.007	0.006	Na
Annual Average (ppm)	0.002	0.003	0.001	0.002	Na
PM_{10}*					
Measured Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	30	25	22	23	Na
Calculated Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	163.4	146.4	136.0	138.5	Na
Measured Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	1	0	0	0	Na
Calculated Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	6.1	0	0	0	Na
Max. Daily ($\mu g/m^3$)	158.0	126.0	108.0	126.0	Na
State Annual Average ($\mu g/m^3$)	56.1	53.9	47.0	46.2	Na
Federal Annual Average ($\mu g/m^3$)	56.0	53.6	46.6	45.4	Na
OTAY MESA—DONOVAN CORRECTIONAL FACILITY MONITORING STATION					
PM_{10}*					
Measured Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	8	10	3	2	1
Calculated Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)	47.4	62.4	18.0	12.6	6.1
Measured Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	0	0	0	0
Max. Daily ($\mu g/m^3$)	99.0	81.0	57.0	56.0	53.0
State Annual Average ($\mu g/m^3$)	31.2	34.2	29.8	25.9	24.4
Federal Annual Average ($\mu g/m^3$)					

NOTE: Table has been updated to show data from 2008 to 2012. For ease of viewing, strikeout/underline has been removed.

SOURCE: State of California ~~2012~~2013.

Na = Not available; ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter

*Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

ozone problem. More strict automobile emission controls, including more efficient automobile engines, have played a large role in why ozone levels have steadily decreased.

In the SDAB overall, during the five-year period of ~~2007~~ 2008 to ~~2011~~2012, the former national 1-hour ozone standard of 0.12 parts per ~~mission~~ million (ppm) was exceeded ~~1 day in 2007 and~~ 2 days in 2008. The stricter state 1-hour ozone standard of 0.09 ppm was exceeded ~~21 days in 2007,~~ 18 days in 2008, 8 days in 2009, 7 days in 2010, ~~and~~ 5 days in 2011, and 2 days in 2012 (see Table 5.3-2).

At the Otay Mesa–Paseo International monitoring station, ~~T~~the 1-hour state standard for ozone of 0.09 ppm was exceeded 2 days in 2008, 1 day in 2009, and 1 day in 2011 ~~at the Otay Mesa–Paseo International monitoring station~~ during the five-year period of ~~2007~~ 2008 to ~~2011~~ 2012 (see Table 5.3-3).

In order to address adverse health effects due to prolonged exposure, the U.S. EPA phased out the national 1-hour ozone standard and replaced it with the more protective 8-hour ozone standard. The SDAB is currently a nonattainment area for the previous (1997) national 8-hour standard and is recommended as a nonattainment area for the revised (2008) national 8-hour standard of 0.075 ppm.

In the SDAB overall, during the five-year period of ~~2007~~ 2008 to ~~2011~~ 2012 the ~~former national 8-hour ozone standard of 0.08 ppm was exceeded 7 days in 2007, 11 days in 2008, 4 days in 2009, 1 day in 2010, and 3 days in 2011. The revised~~ national 8-hour standard of 0.075 was exceeded ~~27 days in 2007,~~ 35 days in 2008, 24 days in 2009, 14 days in 2010, ~~and~~ 10 days in 2011, and 10 days in 2012. The stricter State 8-hour ozone standard of 0.07 ppm was exceeded ~~50 days in 2007,~~ 69 days in 2008, 47 days in 2009, 21 days in 2010, ~~and~~ 33 days in 2011, and 25 days in 2012.

At the Otay Mesa–Paseo International monitoring station, ~~T~~the previous national 8-hour standard of 0.08 ppm was exceeded 1 day in 2008 and the revised national 8-hour standard of 0.075 ppm was exceeded 2 days in 2008 ~~at the Otay Mesa-Paseo International monitoring station~~ during the five-year period from ~~2007~~ 2008 to ~~2011~~ 2012 (see Table 5.3-3). The stricter state 8-hour ozone standard of 0.07 ppm was exceeded ~~on 1 day in 2007,~~ 3 days 2008~~,~~ and 1 day in 2011.

Not all of the ozone within the SDAB is derived from local sources. Under certain meteorological conditions, such as during Santa Ana wind events, ozone and other pollutants are transported from the Los Angeles Basin and combine with ozone formed from local emission sources to produce elevated ozone levels in the SDAB.

Local agencies can control neither the source nor the transportation of pollutants from outside the air basin. The SDAPCD's policy, therefore, has been to control local sources effectively enough to reduce locally produced contamination to clean air standards. Through

the use of air pollution control measures outlined in the RAQS, the SDAPCD has effectively reduced O_3 levels in the SDAB.

Actions that have been taken in the SDAB to reduce O_3 concentrations include:

- **TCMs, if vehicle travel and emissions exceed attainment demonstration levels.** TCMs are strategies that will reduce transportation-related emissions by reducing vehicle use or improving traffic flow.

- **Enhanced motor vehicle inspection and maintenance program.** The smog-check program is overseen by the Bureau of Automotive Repair. The program requires most vehicles to pass a smog test once every two years before registering in the state of California. The smog-check program monitors the amount of pollutants automobiles produce. One focus of the program is identifying "gross polluters," or vehicles that exceed two times the allowable emissions for a particular model. Regular maintenance and tune-ups, changing oil, and checking tire inflation can improve gas mileage and lower air pollutant emissions. It can also reduce traffic congestion due to preventable breakdowns, further lowering emissions.

- **Air Quality Improvement Program (AQIP).** The AQIP, established by AB 118, is a voluntary incentive program administered by the CARB to fund clean vehicle and equipment projects, research on biofuels production and the air quality impacts of alternative fuels, and workforce training.

b. Carbon Monoxide

The SDAB is classified as a state attainment area and as a federal maintenance area for carbon monoxide (County of San Diego 1998). Until 2003, no violations of the state standard for CO had been recorded in the SDAB since 1991, and no violations of the national standard had been recorded in the SDAB since 1989. The violations that took place in 2003 were likely the result of massive wildfires that occurred throughout the county. No violations of the state or federal CO standards have occurred since 2003. As shown in Tables 5.3-2 and 5.3-3, the state and national standards have not been exceeded at the Otay Mesa monitoring stations or the SDAB during the five-year period from ~~2007~~ 2008 to ~~2011~~2012.

Small-scale, localized concentrations of CO above the state and national standards have the potential to occur at intersections with stagnation points such as those that occur on major highways and heavily traveled and congested roadways. Localized high concentrations of CO are referred to as "CO hot spots" and are a concern at congested intersections, where automobile engines burn fuel less efficiently and their exhaust contains more CO.

c. Particulate Matter Less than 10 Microns

PM_{10} is particulate matter with an aerodynamic diameter of 10 microns or less. Ten microns is about one-seventh of the diameter of a human hair. Particulate matter is a complex

mixture of very tiny solid or liquid particles composed of chemicals, soot, and dust. Sources of PM_{10} emissions in the SDAB consist mainly of urban activities, dust suspended by vehicle traffic, and secondary aerosols formed by reactions in the atmosphere.

Under typical conditions (i.e., no wildfires) particles classified under the PM_{10} category are mainly emitted directly from activities that disturb the soil including travel on roads and construction, mining, or agricultural operations. Other sources include windblown dust, salts, brake dust, and tire wear (County of San Diego 1998). For several reasons hinging on the area's dry climate and coastal location, the SDAB has special difficulty in developing adequate tactics to meet present state particulate standards.

The SDAB is designated as federal unclassified and state non-attainment for PM_{10}. The measured federal PM_{10} standard was exceeded ~~once in 2007 and~~ once in 2008 in the SDAB. ~~The 2007 exceedance occurred on October 21, 2007, at a time when major wildfires were raging throughout San Diego County. Consequently, this exceedance was likely caused by the wildfires and would be beyond the control of the SDAPCD (CARB 2010d). As such, this event is covered under the EPA's Natural Events Policy that permits, under certain circumstances, the exclusion of air quality data attributable to uncontrollable natural events (e.g., volcanic activity, wild land fires, and high wind events). The 2008 exceedance did not occur during wildfires and is not covered under this policy.~~ The stricter state standard was exceeded a calculated number of ~~days of 158.6 days in 2007,~~ 163.4 days in 2008, 146.4 days in 2009, 136 days in 2010, ~~and~~ 138.5 days in 2011, and 6.1 days in 2012. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. Particulate measurements are collected every six days.

At the Otay Mesa-Paseo International monitoring station, the national 24-hour PM_{10} standard was exceeded ~~one day in 2007 and~~ one day in 2008 during the years ~~2007~~ 2008 through ~~2011~~2012. The stricter state 24-hour PM_{10} standard was exceeded ~~27 days in 2007,~~ 30 days in 2008, 25 days in 2009, 22 days in 2010, ~~and~~ 23 days in 2011, and 1 day in 2012.

At the Otay Mesa-Donovan Correctional Facility monitoring station, the national 24-hour PM_{10} standard was not exceeded ~~one day in 2007 during the years~~ between ~~2007~~ 2008 ~~through~~ and ~~2011~~2012. The stricter state 24-hour PM_{10} standard was exceeded ~~10 days in 2007,~~ 8 days in 2008, 10 days in 2009, 3 days in 2010, ~~and~~ 2 days in 2011, and 1 day in 2012.

d. Particulate Matter Less than 2.5 Microns

Airborne, inhalable particles with aerodynamic diameters of 2.5 microns or less have been recognized as an air quality concern requiring regular monitoring. Federal regulations required that $PM_{2.5}$ monitoring begin January 1, 1999 (County of San Diego 1999). The Otay Mesa monitoring stations do not monitor $PM_{2.5}$. Federal $PM_{2.5}$ standards established in 1997 include an annual arithmetic mean of 15 micrograms per cubic meter ($\mu g/m^3$) and a 24-hour

concentration of 65 $\mu g/m^3$. As discussed above, the 24-hour $PM_{2.5}$ standard has been changed to 35 $\mu g/m^3$. However, this does not apply to the monitoring in 2005 or 2006. State $PM_{2.5}$ standards established in 2002 are an annual arithmetic mean of 12 $\mu g/m^3$.

The SDAB was classified as an attainment area for the previous federal 24-hour $PM_{2.5}$ standard of 65 $\mu g/m^3$ and has been classified as an attainment area for the revised federal 24-hour $PM_{2.5}$ standard of 35 $\mu g/m^3$ (U.S. EPA 2004, 2009). The SDAB is a non-attainment area for the State $PM_{2.5}$ standard (CARB 2009).

In the SDAB overall the new national standard of 35 $\mu g/m^3$ was exceeded a calculated number of days of ~~11.4 days in 2007,~~ 3.5 days in 2008, 3.4 days in 2009, 2 days in 2010, ~~and~~ 3 days in 2011, and 2 days in 2012. Additionally, although the federal annual standard was not exceeded during the period from ~~2007~~ 2008 through ~~2011~~2012, the State annual standard was routinely exceeded during this period in the SDAB overall.

e. Nitrogen Dioxide, Sulfur Dioxide, and Lead

The national and state standards for NO_2, SO_x, and previous standard for lead are being met in the SDAB, and the latest pollutant trends suggest that these standards will not be exceeded in the foreseeable future. As discussed above, new standards for these pollutants have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is also in attainment of the state standards for hydrogen sulfides, sulfates, and visibility reducing particles.

f. Odors

The State of California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51 prohibit emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The provisions of these regulations do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. It is generally accepted that the “considerable” number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a “considerable” number of persons or businesses in the area will be considered to be a significant, adverse odor impact.

Every use and operation shall be conducted so that no unreasonable heat, odor, vapor, glare, vibration (displacement), dust, smoke, or other forms of air pollution subject to SDAPCD standards shall be discernible at the property line of the parcel upon which the use or operation is located. Therefore, any unreasonable odor discernible at the property line of a future project site within the CPU area will be considered a significant odor impact.

5.3.2 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds, impacts related to air quality and odor would be significant if the CPU would:

1. Obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP;
2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state AAQS (including the release of emissions which exceed quantitative thresholds for ozone precursors);
4. Expose sensitive receptors to substantial pollutant concentration, including air toxics such as diesel particulates; or
5. Create objectionable odors affecting a substantial number of people.

5.3.3 Issue 1: Plan Consistency

Would the CPU obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP?

5.3.3.1 Impacts

As described above, the CCAA requires areas that are designated nonattainment for ozone, CO, SO_2, and NO_2 to prepare and implement plans to attain the standards by the earliest practicable date. The SDAB is designated nonattainment for ozone, PM_{10}, and $PM_{2.5}$; however, the CCAA does not require a plan for PM_{10} or $PM_{2.5}$. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds (VOCs) and nitrogen oxide (NO_X), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the TCM, were most recently adopted in 2009 as the air quality plan for the region. The basis for these plans is the distribution of population in the region as projected by SANDAG. Updating the adopted Otay Mesa Community Plan to change development potential would, necessarily, result in an inconsistency between the current air quality plans (that are based on the adopted community plan) and the CPU.

Relative to the adopted community plan upon which the RAQS is based, the CPU would:

- increase the number of residential units by approximately 51 percent;
- decrease the amount of land designated for commercial development by 30 percent;
- increase the amount of land designated for institutional development by 13 percent; and
- decrease the amount of land designated for industrial use by 15 percent.

Development associated with the CPU would result in approximately 1,045,025 vehicle trips per day, which is 121,413 fewer trips than what would occur under the adopted community plan (Urban Systems Associates 2012).

As discussed under Section 5.3.4, while area and mobile emissions under the CPU would exceed project-level thresholds, the emissions would be less than area and mobile emissions identified under the adopted community plan for all criteria pollutants. As the primary goal of the RAQS is to reduce ozone precursor emissions and the CPU would result in lower emissions than the existing plan, the CPU would not obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP.

5.3.3.2 Significance of Impacts

Growth and traffic projections as well as development patterns are used to develop the emissions estimates identified in the RAQS, and are the basis for determining required reductions to meet national and State ambient air quality standards. The changes in the land uses under the CPU and the traffic generated under the CPU would result in fewer emissions than the adopted community plan upon which the current RAQS is based. Thus, it can be concluded that the CPU would not obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP and impacts would be less than significant.

5.3.3.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.3.3.4 Significance After Mitigation

Impacts would be less than significant.

5.3.4 Issue 2: Criteria Pollutants

Would the CPU result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Would the CPU result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state AAQS (including the release of emissions which exceed quantitative thresholds for ozone precursors)?

5.3.4.1 Impacts

Air quality impacts would result from the construction and operation of a project. Construction impacts are short-term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts would occur on two levels: regional impacts resulting from growth-inducing development or local hot-spot effects stemming from sensitive receptors being placed close to highly congested roadways. In the case of the CPU, operational impacts are primarily due to emissions within the basin from mobile sources associated with the vehicular travel along the roadways within the CPU area.

Air emissions were calculated using the California Emission Estimator Model (CalEEMod) computer program (SCAQMD 2011). CalEEMod is a tool used to estimate air emissions resulting from land development projects in the state of California. The model generates emissions from three basics sources: construction sources, area sources (e.g., fireplaces and natural gas heating), and operational sources (e.g., traffic).

a. Construction Emissions

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Air pollutants generated by the construction of projects within the CPU area would vary depending upon the number of projects occurring simultaneously and the size of each individual project. Construction-related pollutants result from dust raised during demolition and grading, exhaust emissions from construction vehicles, and products used during construction. Construction operations are subject to the requirements established in Regulation 4, Rules 52 and 54, of the SDAPCD's rules and regulations, which are intended to limit and control fugitive dust emissions.

The exact number and timing of future development projects that would occur under the CPU are unknown. However, for projects located within the predominantly developed

portions of the CPU, it can be assumed that projects would be relatively small in terms of land area, some of which would involve the demolition of existing structures or improvements. Conversely, projects located in the undeveloped portions of the CPU area would involve relatively large tracts of land with limited demolition activities.

To simulate the range of potential air emissions that would occur, two hypothetical projects were evaluated. These hypothetical projects include a 1-acre multi-family residential project that may be typical in the more developed portions of the CPU area and the development of a large scale project that would occur in the undeveloped portions of the CPU area. Table 5.3-4 represents a reasonable worst-case scenario for each type of project based on the parameters detailed in Appendix C.

TABLE 5.3-4
SAMPLE DAILY CONSTRUCTION EMISSIONS

Pollutant	Small Project	Large Project	Threshold
ROG	76	90	137
NO_X	45	111	250
CO	27	59	550
SO_2	0	0	250
PM_{10}	8	23	100
$PM_{2.5}$	5	15	100[1]

[1]The $PM_{2.5}$ threshold is based on the PM_{10} standard and the methodology presented in the *Final Methodology to Calculate $PM_{2.5}$ and $PM_{2.5}$ Significance Thresholds* (SCAQMD 2006).
NOTE: The total PM emissions indicated in the CalEEMod output files do not equal the sum of the individual source emissions.

The emissions summarized in Table 5.3-4 are the maximum daily emissions for each pollutant that would occur during any phases of construction. In each case the emissions would be below the threshold.

b. Operational Emissions

For comparative purposes, air emissions were calculated for the adopted community plan in the year 2030 and the CPU in the year 2030 using CalEEMod with parameters specified in Appendix C. These emissions are then compared to the project-level thresholds.

The air quality emissions analysis for the CPU was performed consistent with standard methodology. CEQA air quality analyses typically do not quantify the existing emission sources[1], such as existing houses, businesses, etc., but instead rely on the ambient air quality concentrations monitored by the local air district for the existing condition, as this

[1]In addition, the models used to quantify air emissions in CEQA analysis, i.e. URBEMIS and CalEEMod, have general assumptions for operation emissions from area sources, such as space heaters, water heaters, etc., that these sources meet certain current manufacturing requirements, which would not have been required for the existing land uses.

includes all sources in the basin. Unlike some other issue areas, such as traffic, existing sources are not discounted from the project emissions, e.g., existing – project = net project; instead air quality analyses only consider the emissions of the project relative to a set of limits/thresholds. However, project-level standards, i.e. mass emission limits, e.g., X pounds per day/X tons per year[2], are not appropriate for a program-level analysis, as the thresholds are conservative and intended to ensure many individual projects would not obstruct the timely attainment of the national and state ambient air quality standards. As a general principle, discretionary, program-level planning activities, such as general plans, community plans, specific plans, etc., would be evaluated for consistency with the local air quality plan. Whereas the project-level thresholds would be applied to individual project-specific approvals, such as a proposed development project. Therefore, the analysis of the CPU is based on conformance with the RAQS, which is based on the future emissions estimates and related to attainment strategies on the assumptions of the adopted community plan. The analysis looks at the emissions of the CPU in relation to the adopted community plan to determine if the emissions would exceed the emissions estimates included in the RAQS and obstruct attainment, which would potentially result in an exceedance of an ambient air quality standard and could result in the temporary or permanent exposure of persons to unhealthy concentrations of pollutants.

A summary of the modeling results, which includes both mobile and area source emissions, is shown in Table 5.3-5. As shown, total future emissions of all pollutants under the CPU are projected to be greater than project-level thresholds. This is due to future development associated with buildout. Total future emissions under the CPU are projected to be less than under the adopted community plan. This is primarily related to reductions in traffic volumes under the CPU, which is due to the decrease in development intensity under the CPU when compared to the adopted community plan.

2The thresholds are typically based on the EPA's general conformity requirements, which state that projects that do not exceed certain emission levels would have almost no effect on air quality. The emission limits are only applied to nonattainment pollutants. For San Diego this would be 100 tons/year for CO and O_3 (NOX and ROG), however, the City has adopted even more stringent thresholds based on the APCD's trigger limits, which requires an air quality study to be conducted for the APCD if a new stationary source exceeds the levels.

TABLE 5.3-5
AVERAGE DAILY OPERATIONAL EMISSIONS TO THE SAN DIEGO AIR BASIN
(pounds/day)

Season/ Pollutant	Adopted Community Plan (Year 2030)			CPU (Year 2030)		
	Area Source	Mobile Source	Total Emissions	Area Source	Mobile Source	Total Emissions
Summer						
ROG	3,145	2,769	5,914	2,893	2,725	5,619
NOx	5,605	12	5,617	5,166	18	5,184
CO	25,555	1,032	26,587	23,707	1,563	25,270
SO^1	81	0	81	76	0	76
PM_{10}	9,246	6	9,252	8,644	9	8,653
$PM_{2.5}$	505	6	511	471	9	480
Winter						
ROG	3,318	2,769	6,087	3,059	2,725	5,784
NOx	5,785	12	5,797	5,338	18	5,356
CO	25,390	1,032	26,422	23,485	1,563	25,048
SO^1	76	0	76	71	0	71
PM_{10}	9,248	6	9,254	8,646	9	8,655
$PM_{2.5}$	507	6	512	473	9	481

[1]Emissions calculated by CalEEMod are for SO_2.

5.3.4.2 Significance of Impacts

a. Construction Emissions

As demonstrated by the analysis of hypothetical projects, air emissions due to construction would not exceed the applicable thresholds. However, if several of these projects were to occur simultaneously, there is the potential for multiple projects to exceed significance thresholds.

The projects discussed above are illustrative only. Approval of the CPU would not permit the construction of any individual project, and no specific development details are available at this time. The thresholds presented above are applied on a project-by-project basis and are not necessarily intended for assessment of impacts from large or regional plans. The information is presented to illustrate the potential scope of air impacts for projects that would be developed under the plan. While it is not anticipated that construction activities under the CPU would result in significant air quality impacts, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant.

b. Operational Emissions

While emissions under the CPU would exceed project-level thresholds, which would potentially have a significant air quality impact when compared to the existing condition, the CPU would result in lower emissions than the adopted plan.

The CPU would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions used to develop the SDAPCD RAQS. However, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant.

5.3.4.3 Mitigation Framework

The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and CPU. In general, implementation of the policies in the CPU and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

Where mitigation is determined to be necessary and feasible, these measures shall be included in a Mitigation Monitoring and Reporting Program for the project.

Mitigation measures AQ-1 and AQ-2 shall be implemented to reduce project-level impacts. These measures shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

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

a. Minimizing simultaneous operation of multiple pieces of construction equipment;

b. Use of more efficient, or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;

c. Use of alternative fueled construction equipment;

d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and

e. Minimizing idling time by construction vehicles.

AQ-2: Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

5.3.4.4 Significance after Mitigation

While the mitigation framework and CPU policies would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts would remain significant and unavoidable.

5.3.5 Issue 3: Sensitive Receptors

Would the CPU expose sensitive receptors to substantial pollutant concentration, including air toxics such as diesel particulates?

5.3.5.1 Impacts

a. CO Hotspots

The SDAB was redesignated as a CO attainment area subsequent to the passage of the 1990 federal CAA amendments. According to the *Transportation Project-Level Carbon Monoxide Protocol* (University of California Davis) (CO protocol), in maintenance areas, only projects that are likely to worsen air quality necessitate further analysis (University of California, Davis 1997). The Protocol indicates projects may worsen air quality if they worsen traffic flow, defined as increasing average delay at signalized intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project, to operate at LOS E or F. Unsignalized intersections are not evaluated as they are typically do not carry significant volumes or have long delays and are unlikely to result in a CO hotspot.

As indicated in the traffic study, 28 intersections were found to operate at LOS E or worse. Based on the intersection operations, delay, and volume, the three intersections with the greatest potential to result in a CO hot spot were selected for a detailed CO Hot Spot analysis. These intersections are:

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

In accordance with the CO Protocol, if CO concentrations at these three intersections do not result in CO hot spots, it is can be determined that no CO hot spots would occur at the remaining twenty-five intersections.

CALINE4, a computer air emission dispersion model, was used to calculate CO concentrations at receivers located on the corners of each intersection. These concentrations were calculated from various inputs including traffic volumes, from the CPU traffic analysis, and emission factors from EMFAC2011 (CARB 2011).

As shown in Table 5.3-6, concentrations at these three intersections, under the CPU, would not exceed the ambient air quality standards. Therefore, the CPU would result in less than significant impacts with respect to CO hot spots.

TABLE 5.3-6
MAXIMUM BUILDOUT CO CONCENTRATIONS UNDER CPU

Intersection	1-Hour CO ppm	1-Hour CO Standard CAAQS/ NAAQS	8-Hour CO ppm[1]	8-Hour CO Standard CAAQS/ NAAQS
Otay Mesa Rd. and Innovative Wy.	5.7	9.0/9	4.0	20/35
Old Otay Mesa Rd. and Beyer Blvd.	5.7		4.0	
Otay Valley Rd. and Heritage Rd.	8.4		5.9	

[1]8-hour concentrations developed based on a 0.7 persistence factor.

b. Diesel Particulate Matter

Risk assessment is the process by which contaminants of concern are selected for investigation and includes a review of the chemicals that are potentially released to the atmosphere. Following is an analysis of diesel particulate emissions from the vehicular traffic on major roadways and freeways in the CPU area.

Two types of adverse health effects are generally considered in health risk assessments: carcinogenic and non-carcinogenic. Chemicals that potentially produce carcinogenic effects have been shown or are suspected to produce tumors in animals or humans. Therefore, carcinogenic effects are assessed in terms of incremental or excess risks. Non-carcinogenic effects, such as liver or kidney damage, would be either reversible or permanent. Exposure to these chemicals in amounts less than a threshold level would result in no adverse health effects.

Two general types of health effects are considered: potential carcinogenic risks due to chronic (long-term) exposure and potential non-carcinogenic health impacts following chronic and acute (short-term) exposure. For this assessment, only long-term carcinogenic and long-term non-carcinogenic (chronic) risks resulting from diesel particulate matter exposure are evaluated. Acute health risks due to diesel particulate matter exposure are less than significant according to the air quality technical report.

Carcinogenic Risk

As explained more fully in Appendix C, the incremental cancer risk is the likelihood (above the background cancer rate in the general population) that an individual would develop cancer during his or her lifetime as a result of exposure to a substance.

Under Proposition 65, the State of California considers an incremental excess cancer risk of less than 10 in 1,000,000 (10^{-5}) to be acceptable for involuntary exposure. In accordance with the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill), agencies in California have commonly established 10 in 1,000,000 as the risk threshold for notification; this threshold applies to the summed risk from all compounds emitted from a facility.

Figure 5.3-2 shows isopleths of the residential incremental cancer risk under the CPU and the locations of the modeled maximally exposed individual resident (MEIR) and maximally exposed individual worker (MEIW) for the CPU land uses. At the point of maximum impact (PMI), the MEIR average residential incremental cancer risk due to diesel particulates from the area traffic is 2.8 in one million; the 80th percentile residential incremental risk is 3.1 in one million; and the high-end residential incremental risk is 4.0 in one million. At the PMI for the MEIW, the worker incremental cancer risk due to diesel particulates is 0.57 in one million. This is below the 10 in one million threshold.

Non-carcinogenic Risk

The results of the modeling analysis, as detailed in Appendix C, indicate that the maximum chronic hazard index at any of the modeled receivers is 0.19, which is below the significance threshold of 1.0. The location of this maximum impact occurs in the eastern portion of the CPU, south of Sempre Viva Road and east of SR-905, which is designated heavy commercial.

c. Stationary Sources

The CPU includes industrial uses which could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact.

Stationary sources also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources of air pollution are regulated by the local air pollution control or management district, in this case the SDAPCD.

Image source: SanGIS (flown May 2012)

OTAY RIVER
PALM AVE
DENNERY RD
OCEAN VIEW HILLS PARKWAY
DENNERY CANYON
OTAY VALLEY RD
HERITAGE RD
CALIENTE AVE
905
AIRWAY RD
OLD OTAY MESA RD
MOODY CANYON
805
BEYER BLVD
5
EAST BEYER BLVD
SPRING CANYON
CACTUS RD
BRITANNIA BLVD
LONESTAR RD
AVIATOR RD
LA MEDIA RD
OTAY MESA RD
HARVEST RD
ENRICO FERMI DR
AIRWAY RD
905
SIEMPRE VIVA RD
Otay Mesa
Port of Entry
INTERNATIONAL BORDER
San Ysidro
Port of Entry

Otay Mesa Community Plan Boundary
Worker Exposure 1 in 1 million
Residential Exposure 1 in 1 million

CPU Receptors

MEIR
MEIW

Proposed Land Use Plan

Open Space, Parks, Institutional

Open Space
Parks
Institutional

Village Centers

Neighborhood Village
Community Village

Residential

Low
Low Medium
Medium
Medium High

Commercial - Residential Prohibited

Community Commercial
Regional Commercial
Heavy Commercial

Indistrial

Business Park - Office Permitted
Business and International Trade
Light Industrial
Heavy Industrial
Business Park - Residential Permitted

Other

Right-of-Way

0 Feet 3,000

FIGURE 5.3-2
Incremental Cancer Risk and
MEIR/MEIW Community Plan Update

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The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, AB 2588 was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels.

In accordance with AB 2588, any new facility proposed that would have the potential to emit toxic air contaminants would be required to assess air toxic problems that would result from their facility's emissions. Larger industrial facilities are required to provide information regarding emission inventories and health risk assessments. If adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks.

d. Collocation

The CPU contains several areas where residential and other sensitive uses would be located adjacent to industrial and commercial uses. These sensitive land uses would be exposed to toxic air emissions that have the potential to be generated with operation of certain commercial and industrial uses. The CARB and APCD provide guidance on siting land uses to avoid health risks and avoid nuisances. A common component of such guidance is the recommendation to site sensitive land uses outside specified buffers adjacent to or surrounding major emitters or facilities of concern. Table 5.3-7 summarizes the siting recommendations applicable to the CPU area. CARB recommends that these buffers be considered when evaluating land use and collocation decisions.

TABLE 5.3-7
CARB LAND USE SITING CONSTRAINTS

Source Category	Recommended Buffer Distance (feet)
Distribution Centers (that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week)	1,000
Chrome Platers	1,000
Dry Cleaners using Perchloroethylene (1 machine)	300
Dry Cleaners using Perchloroethylene (2 machines)	500
Dry Cleaners using Perchloroethylene (3 or more machines)	Requires consultation with APCD
Large Gas Station (3.6 million gallons or more per year)	300
Other Gas Stations	50

SOURCE: CARB 2005.

5.3.5.2 Significance of Impacts

a. CO Hotspots

As referenced in Section 5.3.5.1, the hot spot analysis indicates that the increases of CO due to the CPU would be below the federal and state 1-hour and 8-hour standards. Therefore, there would be no harmful concentrations of CO and localized air quality emission would not exceed applicable standards, and would not result in a significant impact to sensitive receptors.

b. Diesel Particulate Matter

Carcinogenic Risk

Based on the analysis and modeled results, the development of future land uses within the CPU area would not expose future residents or workers to significant cancer risk from traffic generated diesel exhaust emissions.

There is no adopted standard for evaluating the diesel exhaust emission impacts due to vehicles traveling on local roadway and freeways. Therefore, based on available thresholds, the significance threshold of 10 in 1 million was used in evaluating the potential impacts from the vehicular sources in this analysis. Based on the analysis, the incremental cancer risk increase under the CPU would be 3.4 in a million or less at the MEIR and less than 1 in a million at the MEIW. Thus, the risk at any receptor would be less than 10 in 1 million.

Therefore, incremental cancer risks to sensitive receptors from diesel exhaust emissions would be less than significant at a program-level.

Non-carcinogenic Risk

Chronic risks resulting from diesel exhaust emissions associated with the vehicles operating within and adjacent to the CPU are projected to be less than significant.

c. Stationary Sources

The CPU includes industrial uses which could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact.

Any new facility proposed that would have the potential to emit toxic air contaminants would be required to evaluate toxic air problems resulting from their facility's emissions.

If the facility poses a potentially significant public health risk, the facility would submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Specific

project-level design information would be needed to determine stationary source emission impacts. Therefore, at the program-level, impacts would be potentially significant.

d. Collocation

The CPU would place residential, commercial, and industrial uses in proximity to one another, which would have potential air quality impacts associated with the collocation of incompatible land uses, as described in section 5.3.5.1 (d). Air quality impacts would be associated with exposure to pollutants from the operation of the facility, which can include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The CPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. Future development projects would be required to comply with the collocation policies of the General Plan and CPU, which are necessary to reduce or avoid potential air quality impacts. These policies and standards would include but not be limited to the special policies and performance standards for residential-industrial interface areas, truck circulation, and industrial design, as well as the relevant and mandatory air district, state, and federal controls on toxic air emission sources. While compliance with the CPU and General Plan policies, along with local, state, and federal regulations would reduce potential impacts, future projects may result in sensitive uses (residential uses, schools, parks being located within the buffer distances of the facilities described in Table 5.3-7, and therefore sensitive receptors would be exposed to toxic air emissions. In this case, impacts would be significant.

5.3.5.3 Mitigation Framework

a. CO Hotspots

Impacts would be less than significant; therefore, no mitigation is required.

b. Diesel Particulate Matter

Impacts would be less than significant; therefore, no mitigation is required.

c. Stationary Sources

AQ-3: Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000; see Section 5.3.5.1 [b & c]) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would

reduce health risks to less than significant levels within five years of the date the plan.

d. Collocation

AQ-4: Prior to the issuance of building permits for any project containing a facility identified in Table 5.3-7, or locating air quality sensitive receptors closer than the recommended buffer distances, future projects implemented in accordance with the CPU shall be required to prepare a health risk assessment (HRA) with a Tier I analysis in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (APCD 2006; OEHHA 2003).

All HRAs shall include:

1. the estimated maximum 70-year lifetime cancer risk,
2. the estimated maximum non-cancer chronic health hazard index (HHI), and
3. the estimated maximum non-cancer acute health hazard index (HHI).

Risk estimates shall each be made for the off-site point of maximum health impact (PMI), the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The location of each of these receptors shall be specified. The lifetime cancer risk, non-cancer chronic and acute health hazard indexes for nearby sensitive receptors shall also be reported. Cancer and non-cancer chronic risk estimates shall be based on inhalation risks. HRAs shall include estimates of population exposure, including cancer burden, as well as cancer and noncancer chronic and acute risk isopleths (contours). The HRA shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.

5.3.5.4 Significance After Mitigation

While the Mitigation Framework identified above would reduce the potential impacts associated with exposure to air toxics, no specific projects or improvements have been proposed as part of the CPU, and it cannot be determined whether the proposed mitigation would reduce all impacts to below a level of significance. Therefore, impacts related to exposure to air toxics would be significant and unavoidable.

5.3.6 Issue 4: Odors

Would the CPU create objectionable odors affecting a substantial number of people?

5.3.6.1 Impacts

There are currently no known significant odor generators on or near the project site. The Otay Landfill is located in the City of Chula Vista to the north. However, the landfill is located more than 1,000 feet from the northern CPU boundary. At this distance, the landfill would not create objectionable odors within the CPU.

Although the CPU area is adjacent to numerous industrial operations, there are no known sources of specific, long-term odors, such as waste water treatment plants or animal rendering facilities. While the CPU would allow a variety of land uses, none of the identified land uses are typically associated with the creation of objectionable odors. As the CPU does not include any new sources of odor that would affect sensitive receptors, the potential for odor impacts would be less than significant.

5.3.6.2 Significance of Impacts

Impacts associated with odors would be less than significant.

5.3.6.3 Mitigation Framework

Impact would be less than significant; therefore, no mitigation is required.

5.3.6.4 Significance After Mitigation

Impacts would be less than significant.

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5.4 Biological Resources

RECON prepared a program-level biological technical report for the CPU (2013). This report is included as Appendix D of the PEIR. Secondary data sources were used for the program–level biological analysis and include the California Natural Diversity Data Base (CNDDB) (State of California 2012a); the MSCP Subarea Plan (City of San Diego 1997); and aerial photography. The base vegetation community mapping is taken primarily from SANDAG's 1995 digital file for the Multiple Species Conservation Program (MSCP). This vegetation mapping was updated using information from an aerial photograph of the area (SanGIS 2012). Updates to the vegetation map included areas that were mapped as native vegetation or agricultural, but showed as developed on the 2012 aerial photo. It should be noted that the conclusions found in the Biological Resources Technical Report for the CPU differs from those contained in this EIR section. The conclusion of "Significant and Mitigated" was determined after a comprehensive review of the CPU and associated policies, goals and zoning actions which will guide future development in the CPU area.

5.4.1 Existing Conditions

5.4.1.1 Botanical Resources

There are 14 vegetation communities and land cover types present in the CPU area. The vegetation communities and land cover types are depicted on Figure 5.4-1 and the acreages of each are summarized in Table 5.4-1. Descriptions are provided below.

TABLE 5.4-1
VEGETATION COMMUNITIES AND LAND COVER TYPES

Vegetation Community/Land Cover Type	CPU Area (acres)
Urban/developed	3,843
Non-native grassland	2,406
Diegan coastal sage scrub	1,619
Disturbed land	656
Maritime succulent scrub	541
Agriculture	113
Non-native vegetation	68
Riparian	24
Vernal pool	12
Basin with fairy shrimp	12
Mule fat scrub	5
Freshwater marsh	1
Eucalyptus woodland	1
Alkali seep	1
TOTAL	9,302

a. Wetland Vegetation Communities

Wetland vegetation communities are dominated by plant species adapted to soils that have periods of prolonged saturation. The CPU area has five wetland vegetation communities mapped which are described below. Wetland vegetation communities are considered sensitive by the City of San Diego and resource agencies. These communities are regulated by the City and RWQCB, and some are regulated by USACE, USFWS, and CDFW.

Riparian (24 acres)

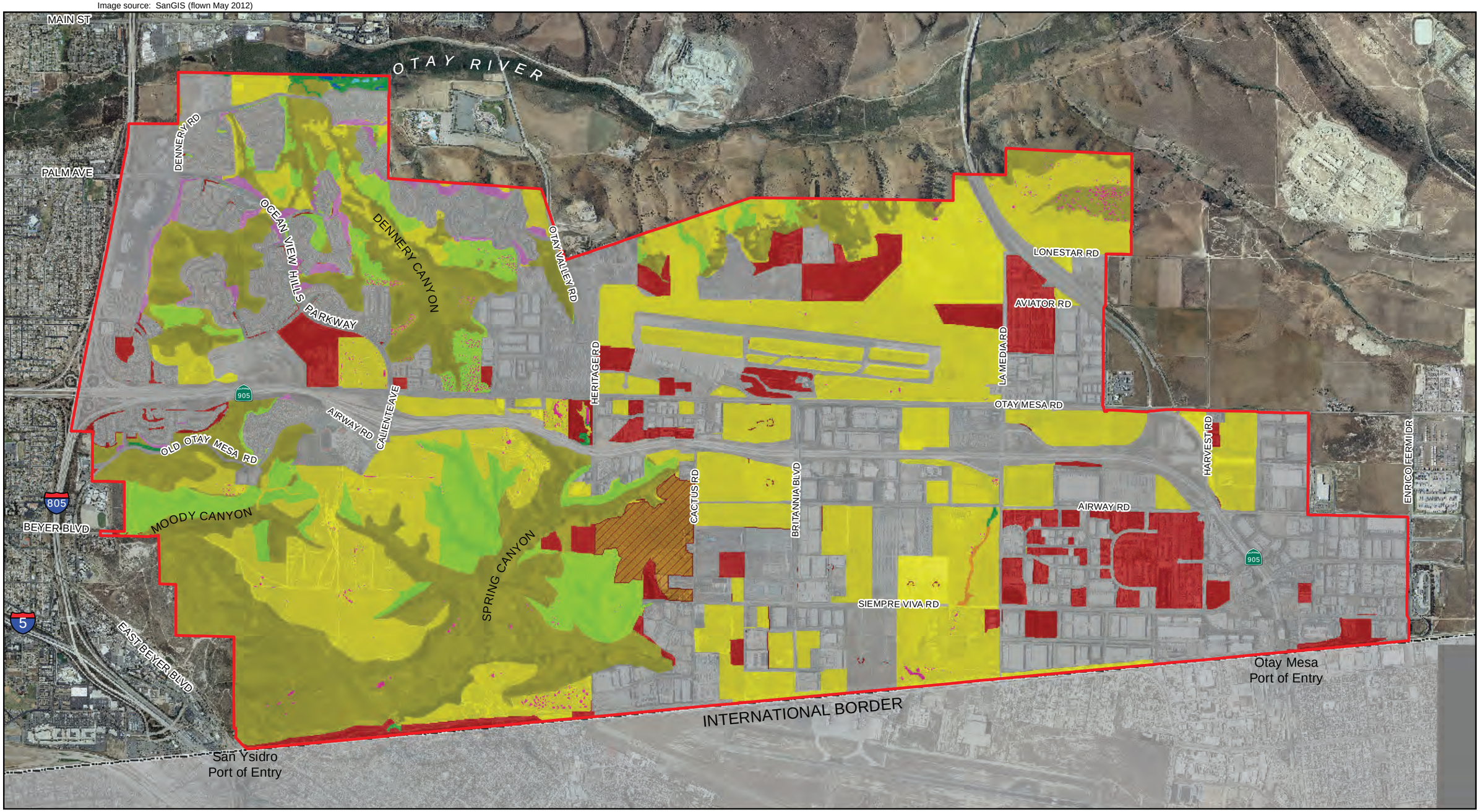
Riparian vegetation consists of riparian scrub, riparian woodland, and/or riparian forest within the CPU area. These communities vary from open to dense and are typically dominated by broad-leafed, winter deciduous trees and/or shrubs. These communities may contain an understory consisting of sub-shrubs or herbaceous species, although denser stands may prevent the development of understory vegetation. Tree species include willows (*Salix* spp.), Fremont cottonwoods (*Populus fremontii*), and/or western sycamores (*Platanus racemosa*). Scrubs are generally dominated by riparian shrubs such as mule fat (*Baccharis salicifolia*). Riparian vegetation as mapped contains areas of riparian vegetation considered disturbed. Disturbed riparian vegetation includes areas that have been impacted from human encroachment (e.g., homeless encampments or other trespasses), or by the invasion of non-native plant species from adjacent areas (e.g., salt cedar [*Tamarix* spp.]). Riparian communities are typically found along major drainages, but also may occur in smaller drainages. Within the CPU area, small patches of riparian vegetation are found within the Otay River Valley, a drainage west of La Media Road upper Dennery Canyon, and Spring Canyon.

Freshwater Marsh (1 acre)

This community consists of perennial emergent plants such as cattails (*Typha* spp.) and bulrush (*Scirpus* spp.). Freshwater marsh vegetation occurs in open bodies of fresh water with little current flow, such as ponds, and to a lesser extent around seeps and springs. The vegetation typically forms a closed canopy. Freshwater marshes occur in areas of permanent inundation by freshwater without active streamflow. Freshwater marsh communities, as with all wetland habitats, have been greatly reduced throughout their entire range and continue to decline as a result of urbanization.

Freshwater marsh areas include the unvegetated open water of ponds, lakes, and wide streams. These freshwater marsh areas are mainly mapped within the northwest portion of the CPU area in the Otay River Valley.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Vegetation Communities and Land Cover Types

- Alkali Seep
- Coastal and Valley Freshwater Marsh
- Diegan Coastal Sage Scrub
- Eucalyptus Woodland
- Maritime Succulent Scrub
- Mule Fat Scrub
- Non-native Grassland
- Non-native Vegetation
- Riparian
- Southern Mixed Chaparral
- Vernal Pool
- Agriculture
- Disturbed Land
- Urban/Developed

0 Feet 2,500

FIGURE 5.4-1

Existing Vegetation Communities and Land Cover Types

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Vernal Pool (12 acres) and Basins with Fairy Shrimp (12 acres)

San Diego mesa claypan vernal pools are shallow, isolated, seasonal wetlands distinguished from other ephemeral wetlands in the region by characteristic plant and animal species. The micro-relief surrounding vernal pools typically consists of small mima mounds or hummocks. San Diego mesa claypan vernal pools have a characteristic suite of plant and animal species. Plants in vernal pools may be aquatic or may germinate following the drying of the pool. Pool sizes range from very small to moderate (up to circa 700 square meters).

Vernal pools can be characterized as Hardpan or Claypan vernal pools which are distinguished by the soil type they occur on, the type of impervious subsoil layer, and vegetation. Claypan vernal pools are primarily found on Otay Mesa on Stockpen soils, but are also located in other areas of San Diego County and into Baja California. Hardpan vernal pools are primarily found north of Otay Mesa (Holland 1986).

Basins with fairy shrimp is a subset of vernal pools used to distinguish the presence of fairy shrimp. Some of these basins may be vernal pools while others are simply road ruts in which fairy shrimp happen to occur.

Approximately 1,266 vernal pools are located within the CPU area. Of this total, 522 are basins with fairy shrimp. These vernal pools are located on mesas in the northeastern, central-western, and southwestern portions of the CPU area. In addition, vernal pools have been mapped west of La Media Road near the International Border. The vernal pools within the CPU area are a mixture of natural and created basins, most of which are found within preserved open space areas. Vernal pool creation/restoration and enhancement has been successful in Otay Mesa as there are multiple vernal pool preserve areas located within the CPU area. The largest of these preserves is the 45-acre Dennery Canyon vernal pool preserve east of Ocean View Hills Parkway.

Otay Mesa vernal pools have historically been impacted by non-native weeds, grazing, and off-road-vehicle activity. Over the years, habitat changes caused by disturbance, including the resulting weed invasion, have diminished the suitable habitat available for ground nesting pollinators. Even though various insects have been observed visiting local vernal pool plant species, studies to determine if any of these insects are effective pollinators are lacking. Therefore referring to the visiting insects as potential pollinators is currently the best terminology to use for these observations. Visiting insects observed (either photographed or collected) on vernal pool plant species' flowers as part of vernal pool restoration monitoring efforts on the Otay Mesa include flies in the families of Sarcophagidae (flesh flies) and Calliphoridae (blow flies), various Hymenoptera including small bees and wasps, Syrphidae (hover flies) and other tiny bees, wasps, and flies, including bee flies, larger bumblebees, and sphinx moths (RECON 2005).

Mule Fat Scrub (5 acres)

Mule fat scrub is an early seral riparian scrub community dominated by mule fat and maintained by frequent flooding. Often this community is distributed along ephemeral streams. In the CPU area, mule fat scrub occurs in a drainage west of La Media Road.

Alkali Seep (1 acre)

Alkali seep typically consists of low-growing perennial herbs in permanently moist or wet alkaline seeps as part of narrow drainages or springs. This vegetation community usually consists of relatively few species and forms complete cover. In the CPU area, alkali seep occurs in the Otay River Valley.

b. Upland Communities

Upland vegetation communities occur on the drier areas of the mesa, slopes, and canyons in the CPU area. Four vegetation communities are in this category as described below.

Non-native Grassland (*2,406 acres*)

Non-native grassland is characterized by a dense to sparse cover of annual grasses, which may include numerous native wildflowers, particularly in years of high rainfall. Non-native grasslands contain species including, but not limited to, bromes, wild oats, ryegrasses, and fescues. Typically, this community includes at least 50 percent cover of the entire herbaceous layer attributable to annual non-native grass species, although other native and non-native plant species may be intermixed (City of San Diego 2012a).

These annuals germinate with the onset of the rainy season and set seeds in the late winter or spring. With a few exceptions, the plants of non-native grasslands are dead through the summer-fall dry season. Non-native grassland is typically found on fine-textured, usually clay, soils, that range from being moist or waterlogged in the winter to being very dry during the summer and fall. This community is found in valleys and foothills throughout much of California at elevations below 3,000 to 4,000 feet (Holland 1986). Non-native grassland can be found dispersed throughout the CPU area,

Diegan Coastal Sage Scrub (*1,619 acres*)

Diegan coastal sage scrub is the southern form of coastal sage scrub comprised of low-growing, aromatic, drought-deciduous soft-woody shrubs that have an average height of approximately three to four feet. Diegan coastal sage scrub is typically dominated by facultatively drought deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), and black sage (*Salvia mellifera*).

This community is typically found on low moisture-availability sites with steep, xeric slopes or clay rich soils that are slow to release stored water. These sites often include drier south- and west-facing slopes and occasionally north-facing slopes, where the community can act as a successional phase of chaparral. Diegan coastal sage scrub transitions to several types of chaparrals at higher elevation, or in drier more inland areas to Riversidean sage scrub. Diegan coastal sage scrub is found in coastal areas from Los Angeles County south into Baja California (Holland 1986).

Some coastal sage scrub areas in the CPU contain another co-dominant species, San Diego bur-sage (*Ambrosia chenopodiifolia*). Other coastal sage scrub areas in the CPU area have a greater percentage of non-native grassland species such as bromes (*Bromus* spp.), wild oats (*Avena* spp.), ryegrasses (*Lolium* spp.), and fescues (*Vulpia* spp.). Coastal sage scrub is found primarily in the northern and western portions of the CPU area both in large acreages and in smaller, more isolated patches.

Maritime Succulent Scrub (*541 acres*)

Maritime succulent scrub is a low (two to three feet high), open (25-75 percent cover) vegetation community dominated by drought deciduous, somewhat woody soft-leaved shrubs with a rich mixture of stem and leaf succulents (e.g., cacti). The proportion of cacti in this community is typically highest in inland areas. Ground cover is more or less devoid of vegetation between shrubs. Growth and flowering are concentrated in the spring. Maritime succulent scrub occurs on thin, rocky, or sandy soils, often on steep slopes of coastal headlands and bluffs. This type of succulent scrub transitions to southern coastal bluff scrub on more exposed headlands and bluffs and with coastal sage scrub on better developed, moister soils away from the immediate coast (Holland 1986). This vegetation community is found in the western half of the CPU area.

Maritime succulent scrub occurs along the slopes of canyons (e.g., Moody Canyon, Dennery Canyon, Spring Canyon) on the western half of the CPU area and along the north–central CPU boundary to the north of Brown Field (see Figure 5.4-1). Some areas of maritime succulent scrub are disturbed and contain an abundance of exotic invasive plant species. Disturbed maritime succulent scrub can be found within the southwestern portion of the CPU area within Spring Canyon.

c. Other Land Cover Types

Four other land cover types are present within the CPU area. All result from some sort of development, encroachment, or other human disturbance.

Urban/Developed (*3,843 acres*)

Areas mapped as developed include locations with residential housing, commercial, and industrial land uses. Urban/developed includes ornamental areas that have been landscaped with non-native species and are actively maintained.

Disturbed Land (*656 acres*)

Disturbed land includes undeveloped areas modified by activities such as grading, scraping, or off-road vehicle use. Areas mapped as disturbed are scattered throughout the CPU area, primarily in the western and the northern portion. A large portion of the southwestern corner of the CPU area, particularly within and surrounding Spring Canyon, was identified in the MSCP mapping as disturbed. However, these areas likely support some native and non-native vegetation and would require that a site-specific biological survey be conducted during the project-specific analysis to determine if any native or non-native habitats exist on-site. In addition, some of these disturbed lands may, or do, support burrowing owls (*Athene cunicularia hypugaea),* which would require site-specific protocol surveys.

Agriculture (*113 acres*)

This land cover type includes all agricultural land (both active and inactive). Agricultural activities are present primarily within the southern half of the CPU area, with several patches along the northern boundary of the CPU area.

Non-native Vegetation (*68 acres*)

Non-native vegetation consists of non-native plant species, including ornamental and/or invasive species. This land cover type occurs primarily in the northeastern portion of the CPU. However, this area likely supports some native vegetation and would need to be verified during future project-specific analyses to determine if any native or non-native habitats exist on-site.

Eucalyptus Woodland (*1 acre*)

Eucalyptus woodland is comprised of stands of eucalyptus trees (*Eucalyptus* spp.). These trees are not native to the area and are considered invasive species because of their rapid growth rate, broad cover, and allelopathic chemicals contained in their leaf litter that prevents understory species from growing. Once established, eucalyptus groves often form dense canopies that displace native habitats over time (Holland 1986). Eucalyptus woodland was mapped along the future Beyer Boulevard extension along the western edge of the CPU area and along the northern edge of the CPU area west of SR-125.

5.4.1.2 Sensitive Vegetation Communities

Sensitive vegetation communities are those communities that are of highly limited distribution. These communities may also support concentrations of sensitive plant or wildlife species. Upland communities within the MSCP are divided into four tiers of sensitivity based on rarity and ecological importance (City of San Diego 2012a). Tier I is the most sensitive and Tier IV is the least sensitivity. The sensitive vegetation communities present in the CPU area are shown on Figure 5.4-2 and summarized below.

Maritime succulent scrub is an MSCP Tier I habitat within the CPU area. Tier I is mapped primarily in the northern and western portions of the CPU area, along Dennery Canyon, Moody Canyon, Spring Canyon, and the Otay River Valley.

Diegan coastal sage scrub, in pristine or disturbed condition, is considered sensitive by federal and state resource agencies due to the scarcity of this vegetation community and the number of sensitive species associated with it. This vegetation community is categorized as a Tier II vegetation community. Tier II vegetation is mapped primarily in the western and northern portions of the CPU area, along Dennery Canyon, Moody Canyon, Spring Canyon, and the Otay River Valley.

Non-native grassland is classified as a Tier IIIB community. Tier IIIB habitat is considered less valuable than native habitat, but still provides foraging habitat for many species, particularly raptors, and may support a variety of rare plant and animal species. Tier IIIB is found in the northeastern portion and scattered in patches elsewhere in the CPU area.

All wetland vegetation communities, including vernal pools, are considered sensitive by the City of San Diego and resource agencies. These communities are regulated by the City, USFWS, and RWQCB and some are regulated by USACE and CDFW. Site-specific analysis would be required for future development implemented in accordance with the CPU to determine what agencies (City, USFWS, RWQCB, USACE or CDFW) would have regulatory authority on basins with fairy shrimp.

5.4.1.3 Sensitive Species

For purposes of this report, a species is considered sensitive if it: (1) is listed by state or federal agencies as threatened or endangered or is a candidate or proposed for such listing; (2) is considered rare, endangered, or threatened by the State of California and/or listed in the CNDDB (State of California 2012a, 2012b, 2011a, 2011b); (3) is a narrow endemic or covered species in the City of San Diego Multiple Species Conservation Program Subarea Plan (City of San Diego 1997); (4) has a California Native Plant Society (CNPS) Rare Plant Ranking of 1B or 2 in the *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2012); or (5) is considered rare,

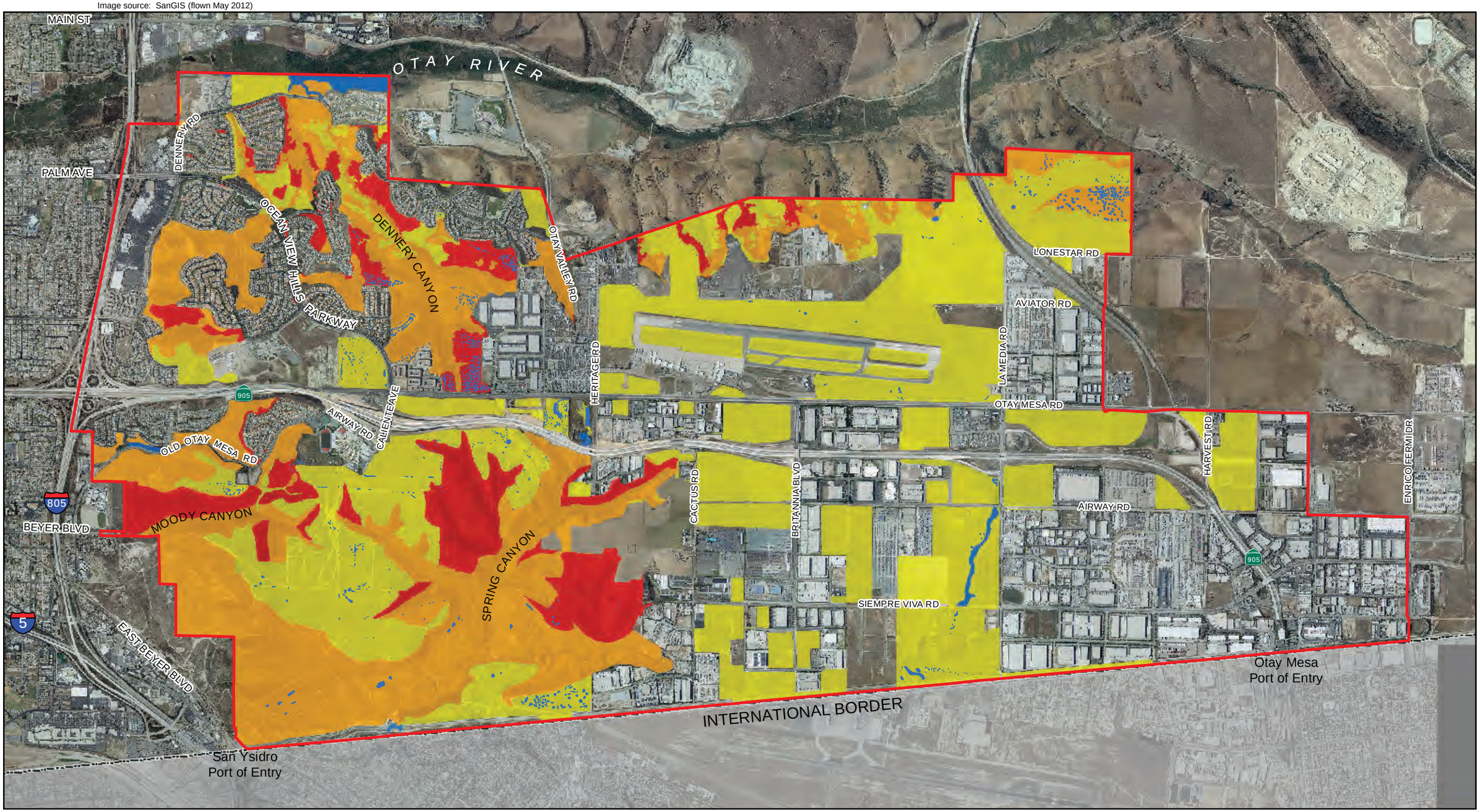
sensitive, or noteworthy by local conservation organizations or specialists. Noteworthy plant species are considered to be those that have a CNPS Rare Plant Ranking of 3 and 4 in the *Inventory*. The sensitive plant species below are known to occur within the CPU area based on information obtained from the literature review. Sources include, but are not limited to, the CNDDB (State of California 2012a) and the reports listed in Appendix D. Precise locations of sensitive plant species would be identified through on-site reconnaissance and project-level analysis in conjunction with proposed future development.

a. Sensitive Plant Species

There are 23 sensitive plant species occurring or historically known to occur in the CPU area. These plants and their status are summarized in Table 5.4-2 and include the following.

- Eight species are state and/or federally listed: San Diego button-celery, San Diego ambrosia, Otay tarplant, San Diego thornmint, Otay mesa mint, spreading navarretia, small-leaved rose, and California Orcutt grass. Of these, one species, spreading navarretia, have designated critical habitat within the CPU area (Figure 5.4-3).
- The other 15 species have a CNPS Rare Plant Ranking of 1B, 2, 3 or 4: south coast saltscale, San Diego bur-sage, San Diego County viguiera, decumbent goldenbush, golden-spined cereus, snake cholla, San Diego barrel cactus, variegated dudleya, cliff spurge, Nuttall's scrub oak, little mousetail, California adolphia, Orcutt's bird's-beak, San Diego goldenstar, and Orcutt's brodiaea.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Vegetation Classification

- Tier I Uplands
- Tier II Uplands
- Tier IIIA Uplands
- Tier IIIB Uplands
- Wetlands

0 Feet 2,500

FIGURE 5.4-2

Sensitive Vegetation Communities

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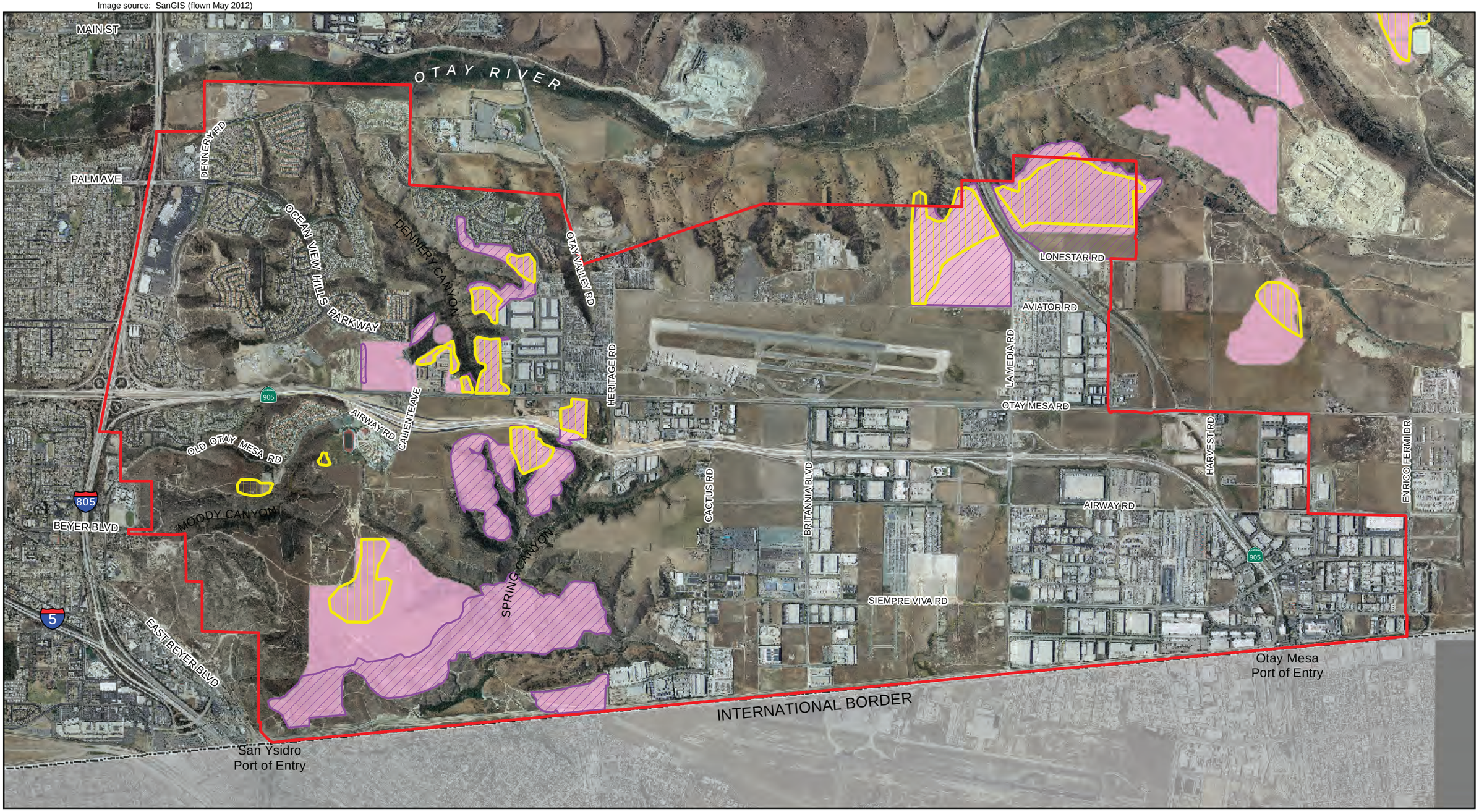
Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

USFWS Critical Habitat for Spreading Navarretia

USFWS Critical Habitat for Riverside Fairy Shrimp

USFWS Critical Habitat for San Diego Fairy Shrimp

0 Feet 2,500

FIGURE 5.4-3

Location of Designated Critical Habitat for Spreading Navarretia, San Diego Fairy Shrimp and Riverside Fairy Shrimp within the Otay Mesa Community Plan Boundary

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TABLE 5.4-2
SENSITIVE PLANT SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
ANGIOSPERMS: DICOTS				
AMARANTHACEAE	**AMARANTH FAMILY**			
Atriplex pacifica south coast saltscale	–/–	1B.2	–	Annual herb; coastal bluff scrub, coastal dunes, coastal sage scrub, playas; blooms Mar.–Oct.; elevation less than 500 feet.
APIACEAE	**CARROT FAMILY**			
Eryngium aristulatum var. *parishii* San Diego button-celery	CE/FE	1B.1	NE, MSCP	Annual/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April–June; elevation less than 2,000 feet.
ASTERACEAE	**SUNFLOWER FAMILY**			
Ambrosia chenopodiifolia San Diego bur-sage	–/–	2.1	–	Shrub; coastal sage scrub, cobbly loam soils; blooms April–June; elevation 150–500 feet. Approximately 10 occurrences known in San Diego. Additional populations in Baja California, Mexico.
Ambrosia pumila San Diego ambrosia	–/FE	1B.1	NE, MSCP	Perennial herb; chaparral, coastal sage scrub, valley and foothill grassland, creek beds, vernal pools, often in disturbed areas; blooms May–Sept.; elevation less than 1,400 feet. Many occurrences extirpated in San Diego County.
Bahiopsis [=*Viguiera*] *laciniata* San Diego County viguiera	–/–	4.2	–	Shrub; chaparral, coastal sage scrub; blooms Feb.–June; elevation less than 2,500 feet.
Deinandra [=*Hemizonia*] *conjugens* Otay tarplant	CE/FT	1B.1	NE, MSCP	Annual herb; coastal sage scrub, valley and foothill grassland, clay soils; blooms May–June, elevation less than 1,000 feet.
Isocoma menziesii var. *menziesii* [=var. *decumbens*] Decumbent goldenbush	–/–	1B.2	–	Shrub; chaparral, coastal sage scrub, sandy soils, often in disturbed areas; blooms April–Nov.; elevation less than 500 feet.
CACTACEAE	**CACTUS FAMILY**			
Bergerocactus emoryi Golden-spined cereus	–/–	2.2	–	Succulent; closed-cone coniferous forest, chaparral, coastal sage scrub, sandy; blooms May–June; elevation less than 1,300 feet.
Cylindropuntia [=*Opuntia*] *californica* var. *californica*] Snake cholla	–/–	1B.1	NE, MSCP	Succulent shrub; chaparral, coastal sage scrub; blooms April–May; elevation 100–500 feet.
Ferocactus viridescens San Diego barrel cactus	–/–	2.1	MSCP	Succulent; chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; blooms May–June; elevation less than 1,500 feet.

TABLE 5.4-2
SENSITIVE PLANT SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
CRASSULACEAE	**STONECROP FAMILY**			
Dudleya variegata Variegated dudleya	–/–	1B.2	NE, MSCP	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms May–June; elevation less than 2,000 feet.
EUPHORBIACEAE	**SPURGE FAMILY**			
Euphorbia misera Cliff spurge	–/–	2.2	–	Shrub; coastal sage scrub, maritime succulent scrub, coastal bluff scrub; blooms Dec.–Aug.; elevation less than 2,000 feet.
FAGACEAE	**OAK FAMILY**			
Quercus dumosa Nuttall's scrub oak	–/–	1B.1	–	Evergreen shrub; closed-cone coniferous forest, coastal chaparral, coastal sage scrub, sandy and clay loam soils; blooms Feb.–March; elevation less than 1,300 feet.
LAMIACEAE	**MINT FAMILY**			
Acanthomintha ilicifolia San Diego thornmint	CE/FT	1B.1	NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands on friable or broken clay soils; blooms April–June; elevation less than 3,100 feet.
Pogogyne nudiuscula Otay mesa mint	CE/FE	1B.1	NE, MSCP	Annual herb; vernal pools; blooms May–July; elevation 300–800 feet. Known from six occurrences in Otay Mesa.
POLEMONIACEAE	**PHLOX FAMILY**			
Navarretia fossalis Spreading navarretia	–/FT	1B.1	NE, MSCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.
RANUNCULACEAE	**BUTTERCUP FAMILY**			
Myosurus minimus ssp. *apus* Little mousetail	–/–	3.1	–	Annual herb; vernal pools, perennial grasslands; blooms March–June; elevation 70–2,100 feet.
RHAMNACEAE	**BUCKTHORN FAMILY**			
Adolphia californica California adolphia	–/–	2.1	–	Deciduous shrub; Diegan coastal sage scrub and chaparral; clay soils; blooms Dec.–May; elevation 100–1,000 feet.
ROSACEAE	**ROSE FAMILY**			
Rosa minutifolia Small-leaved rose	CE/–	2.1	MSCP	Shrub; coastal sage scrub; blooms Jan.–June; elevation 500–550 feet. Known in California from only one occurrence on Otay Mesa, this occurrence now part of a translocation program on Otay Mesa.
SCROPHULARIACEAE	**FIGWORT FAMILY**			
Cordylanthus orcuttianus Orcutt's bird's-beak	–/–	2.1	MSCP	Annual herb; coastal sage scrub; blooms March–Sept.; elevation less than 1,200 feet.

TABLE 5.4-2
SENSITIVE PLANT SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
ANGIOSPERMS: MONOCOTS				
POACEAE	**GRASS FAMILY**			
Orcuttia californica California Orcutt grass	CE/FE	1B.1	NE, MSCP	Annual herb; vernal pools; blooms April–August; elevation 50–2,200 feet.
THEMIDACEAE				
Bloomeria [=*Muilla*] *clevelandii* San Diego goldenstar	–/–	2.1	MSCP	Perennial herb (bulbiferous); chaparral, coastal sage scrub, valley and foothill grassland, vernal pools, clay soils; blooms May; elevation 170–1,500 feet.
Brodiaea orcuttii Orcutt's brodiaea	–/–	1B.1	MSCP	Perennial herb (bulbiferous); closed cone coniferous forest, chaparral, meadows and seeps, valley and foothill grassland, vernal pools, mesic, clay soil; blooms May–July; elevation less than 5,300 feet.

FEDERAL CANDIDATES AND LISTED PLANTS
FE = Federally listed endangered
FT = Federally listed threatened

STATE LISTED PLANTS
CE = State listed endangered

CITY OF SAN DIEGO
NE = Narrow endemic
MSCP = Multiple Species Conservation Program covered species

CALIFORNIA NATIVE PLANT SOCIETY RARE PLANT RANKINGS
1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
2 = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

b. Sensitive Animal Species

There are 28 sensitive wildlife species known from the CPU area based on information obtained from the literature review. Sources include, but are not limited to, the CNDDB (State of California 2012a) and the Draft Year 4 Annual Report for Dennery Canyon Vernal Pool Restoration, Coastal Sage Scrub, and Mule Fat Scrub Restoration and Preservation Plan (RECON 2004), along with other sources listed in Appendix D. Precise locations of sensitive wildlife species would be identified through on-site reconnaissance in conjunction with future projects. Table 5.4-3 lists the sensitive wildlife known to occur in the CPU area.

- Federally listed invertebrates: San Diego fairy shrimp, Riverside fairy shrimp, and the Quino checkerspot butterfly. These species all have designated critical habitat within the CPU area. Figure 5.4-3 shows the designated critical habitat for San Diego fairy shrimp and Riverside fairy shrimp. Figure 5.4-4 shows the designated critical habitat for Quino checkerspot butterfly.

- Amphibians: western spadefoot.

- Reptiles: Belding's orange-throated whiptail, Coronado skink, San Diego horned lizard, red diamond rattlesnake, and two-striped gartersnake.

- Birds: great egret, white-tailed kite, black-crowned night heron, northern harrier, Cooper's hawk, golden eagle, prairie falcon, western burrowing owl, loggerhead shrike, least Bell's vireo, California horned lark, coastal cactus wren, coastal California gnatcatcher, yellow-breasted chat, southern California rufous-crowned sparrow, and grasshopper sparrow.

- Mammals: northwestern San Diego pocket mouse, San Diego desert woodrat, and San Diego black-tailed jackrabbit.

5.4.1.4 Jurisdictional Waters

Agencies with jurisdictional authority over wetlands and other jurisdictional water resources include USFWS, USACE, CDFW, RWQCB, and the City of San Diego.

As shown on Table 5.4-1, there are approximately 55 acres of the CPU area that have been mapped as a wetland or water resource (e.g., riparian, vernal pool, basin with fairy shrimp, mule fat scrub, freshwater marsh, and alkali seep). Future subsequent projects implemented in accordance with the CPU would be required to conduct an analysis of the wetland (e.g., protocol wetland delineation) and water resources, in order to identify any potential wetlands and other jurisdictional waters. If warranted, a formal wetland delineation would need to be conducted to identify the precise boundaries of these resources to determine the extent of the existing waters/wetlands and to accurately determine if any impacts would occur from any proposed future project.

TABLE 5.4-3
SENSITIVE WILDLIFE SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA

Species	Status	Habitat/Comments
INVERTEBRATES		
ANOSTRACANS – Fairy Shrimp (Nomenclature from Eriksen and Belk 1999)		
San Diego fairy shrimp *Branchinecta sandiegonensis*	FE,[1], *	Vernal pools.
Riverside fairy shrimp *Streptocephalus woottoni*	FE,[1], *	Vernal pools, generally with a minimum depth of 30 centimeters.
NYMPHALIDAE – Brush-footed butterflies (Nomenclature from Mattoni 1990 and Opler and Wright 1999)		
Quino checkerspot butterfly *Euphydryas editha quino*	FE	Open, dry areas in foothills, mesas, lake margins. Larval host plant *Plantago erecta.* Adult emergence mid-January through April.
AMPHIBIANS (Nomenclature from Crother 2001 and Crother et al. 2003)		
PELOBATIDAE – Spadefoot Toads		
Western spadefoot *Spea hammondii*	CSC, *	Vernal pools, floodplains, and alkali flats within areas of open vegetation.
REPTILES (Nomenclature from Crother 2001 and Crother et al. 2003)		
TEIIDAE – Whiptail Lizards		
Belding's orange-throated whiptail *Aspidoscelis* [=*Cnemidophorus*] *hyperythra beldingi*	CSC, MSCP, *	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.
SCINCIDAE – Skinks		
Coronado skink *Eumeces skiltonianus interparietalis*	CSC	Grasslands, open woodlands and forest, broken chaparral. Rocky habitats near streams.
IGUANIDAE – Iguanid lizards		
San Diego horned lizard *Phrynosoma coronatum* (San Diego/blainvillii population)	CSC, MSCP	Chaparral, coastal sage scrub with fine, loose soil. Partially dependent on harvester ants for forage.
CROTALIDAE – Rattlesnakes		
Red diamond rattlesnake *Crotalus ruber*	CSC	Desert scrub and riparian, coastal sage scrub, open chaparral, grassland, and agricultural fields.
COLUBRIDAE – Colubrid Snakes		
Two-striped gartersnake *Thamnophis hammondii*	CSC, *	Permanent freshwater streams with rocky bottoms. Mesic areas.

TABLE 5.4-3
SENSITIVE WILDLIFE SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Species	Status	Habitat/Comments
BIRDS (Nomenclature from American Ornithologists' Union 1998 and 2005 and Unitt 2004)		
ARDEIDAE – Herons and Bitterns		
Great egret (rookery site) *Ardea alba egretta*	*	Lagoons, bays, estuaries. Ponds and lakes in the coastal lowland. Winter visitor, uncommon in summer.
Black-crowned night heron (rookery site) *Nycticorax nycticorax hoactli*	*	Lagoons, estuaries, bayshores, ponds, and lakes. Often roost in trees. Year-round visitor. Localized breeding.
ACCIPITRIDAE – Hawks, Kites, and Eagles		
White-tailed kite (nesting) *Elanus leucurus majusculus*	CFP	Nest in riparian woodland, oaks, sycamores. Forage in open, grassy areas. Year-round resident.
Northern harrier (nesting) *Circus cyaneus hudsonius*	CSC, MSCP, *	Coastal lowland, marshes, grassland, agricultural fields. Migrant and winter resident, rare summer resident.
Cooper's hawk (nesting) *Accipiter cooperi*	MSCP, *	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas. Year-round resident.
Golden eagle (nesting and wintering) *Aquila chrysaetos*	CFP, BEPA, CSC, BCC, MSCP, *	Require vast foraging areas in grassland, broken chaparral, or sage scrub. Nest in cliffs and trees. Uncommon resident.
FALCONIDAE – Falcons and Caracaras		
Prairie falcon (nesting) *Falco mexicanus*	*	Grassland, agricultural fields, desert scrub. Uncommon migrant and winter visitor.
STRIGIDAE – Typical Owls		
Western burrowing owl (burrow sites) *Athene cunicularia hypugaea*	CSC, MSCP, BCC, *	Grassland, agricultural land, coastal dunes. Require rodent burrows. Resident of the coastal lowland and agricultural areas of Imperial County.
LANIIDAE – Shrikes		
Loggerhead shrike *Lanius ludovicianus*	CSC, BCC, *	Open foraging areas near scattered bushes and low trees; agriculture, desert wash/scrub, grassland. Fairly common resident.
VIREONIDAE - Vireos		
Least Bell's vireo (nesting) *Vireo bellii pusillus*	FE, SE, MSCP, BCC, *	Willow riparian woodlands. Migrant and summer resident.
ALAUDIDAE - Larks		
California horned lark *Eremophila alpestris actia*	*	Sandy shores, mesas, disturbed areas, grasslands, agricultural lands, sparse creosote bush scrub. Common breeding resident, abundant migrant and winter visitor.

TABLE 5.4-3
SENSITIVE WILDLIFE SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Species	Status	Habitat/Comments
TROGLODYTIDAE – Wrens		
Coastal cactus wren *Campylorhynchus brunneicapillus*	CSC, MSCP, *	Maritime succulent scrub, coastal sage scrub and desert scrub with *Opuntia* thickets. Rare localized resident.
SYLVIIDAE – Gnatcatchers		
Coastal California gnatcatcher *Polioptila californica californica*	FT, CSC, MSCP, *	Coastal sage scrub, maritime succulent scrub. Resident.
PARULIDAE – Wood Warblers		
Yellow-breasted chat (nesting) *Icteria virens auricollis*	CSC, *	Breeding restricted to dense riparian woodland. Localized summer resident.
EMBERIZIDAE – Emberizids		
Southern California rufous-crowned sparrow *Aimophila ruficeps canescens*	MSCP, *	Coastal sage scrub, chaparral, grassland; favors steep and rocky areas. Localized resident.
Grasshopper sparrow (nesting) *Ammodramus savannarum perpallidus*	*	Tall grass areas. Localized summer resident, rare in winter.
MAMMALS (Nomenclature from Baker et al. 2003 and Hall 1981)		
LEPORIDAE – Rabbits and Hares		
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	CSC, *	Open areas of scrub, grasslands, agricultural fields.
HETEROMYIDAE – Pocket Mice and Kangaroo Rats		
Northwestern San Diego pocket mouse *Chaetodipus fallax fallax*	CSC, *	San Diego County west of mountains in sparse, disturbed coastal sage scrub or grasslands with sandy soils.
CRICETIDAE – New World Mice and Rats		
San Diego desert woodrat *Neotoma lepida intermedia*	CSC, *	Coastal sage scrub and chaparral.

[1] In April 2010, the City relinquished federal coverage under the MSCP of the seven vernal pool species. The City currently does not have take authority for vernal pool species. A draft HCP is currently being prepared by the City in consultation with the Wildlife Agencies. Upon adoption of the HCP, the City would have "take" authority for the vernal pool species occurring within the HCP areas.

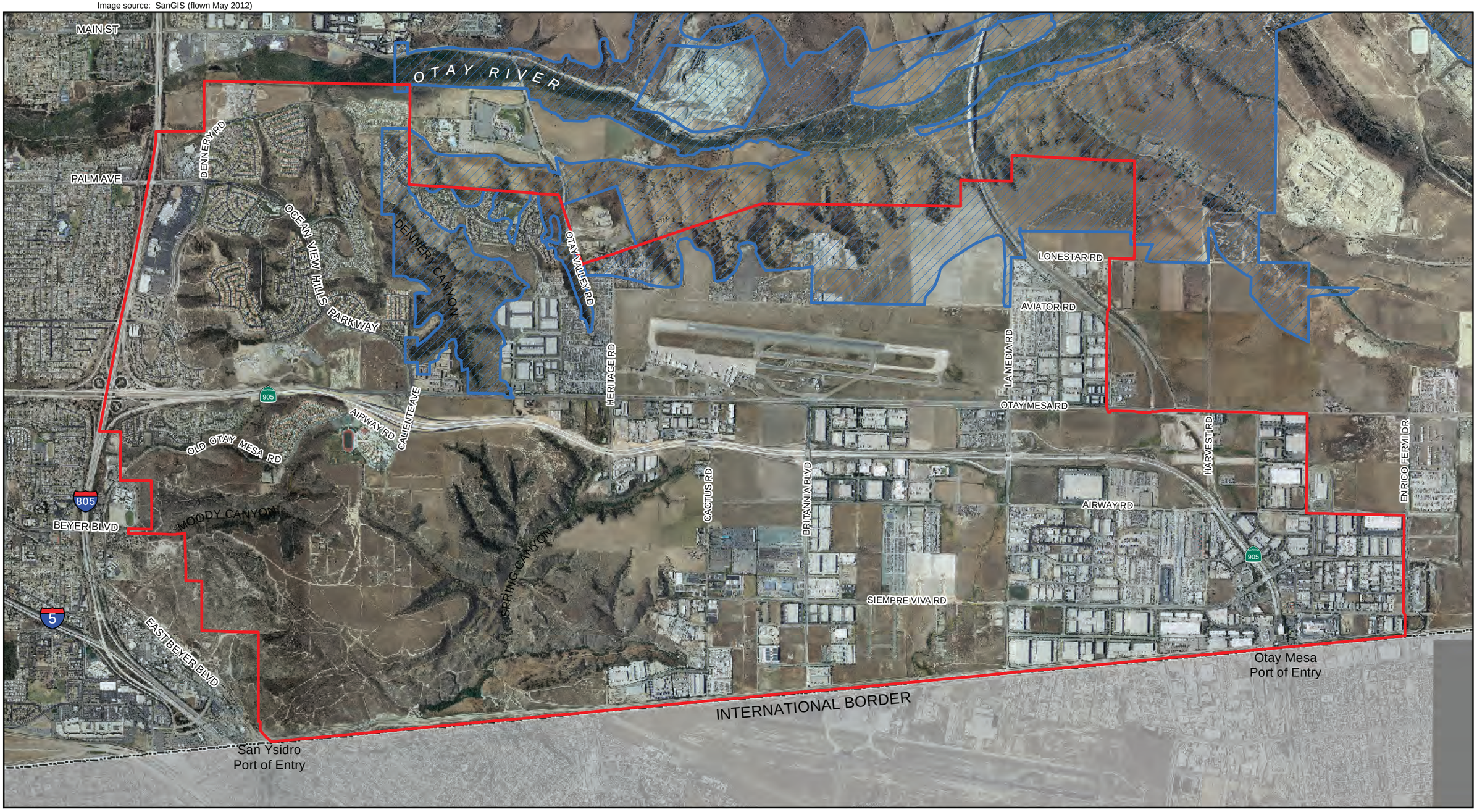
TABLE 5.4-3
SENSITIVE WILDLIFE SPECIES KNOWN TO OCCUR IN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

STATUS CODES

Listed/Proposed
FE = Listed as endangered by the federal government
FT = Listed as threatened by the federal government
SE = Listed as endangered by the State of California

Other
BCC = U.S. Fish and Wildlife Service Birds of Conservation Concern species
BEPA = Bald and Golden Eagle Protection Act
CFP = California fully protected species
CSC = California Department of Fish and Game species of special concern
MSCP = Multiple Species Conservation Program covered species
* = Taxa listed with an asterisk fall into one or more of the following categories:
- Taxa considered endangered or rare under Section 15380(d) of CEQA guidelines
- Taxa that are biologically rare, very restricted in distribution, or declining throughout their range
- Population(s) in California that may be peripheral to the major portion of a taxon's range, but which are threatened with extirpation within California
- Taxa closely associated with a habitat that is declining in California at an alarming rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands)

Image source: SanGIS (flown May 2012)



0 Feet 2,500

Otay Mesa Community Plan Boundary

USFWS Critical Habitat for the Quino Checkerspot Butterfly

FIGURE 5.4-4

Location of Designated Critical Habitat
for the Quino Checkerspot Butterfly
within the Otay Mesa Community Plan Boundary

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a. U.S. Army Corps of Engineers

As stated in the federal regulations for the Clean Water Act, wetlands are defined as:

> those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions (EPA, 40 CFR 230.3 and CE, 33 CFR 328.3).

Wetlands are delineated using three parameters: hydrophytic vegetation, wetland hydrology, and hydric soils. According to USACE, indicators for all three parameters must be present to qualify an area as a wetland.

In accordance with Section 404 of the Clean Water Act, USACE regulates the discharge of dredged or fill material into waters of the U.S. The term “waters of the United States” is defined as:

- All waters currently used, or used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide;
- All interstate waters including interstate wetlands;
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation, or destruction of which could affect foreign commerce including any such waters: (1) which could be used by interstate or foreign travelers for recreational or other purposes; or (2) from which fish or shellfish are, or could be taken and sold in interstate or foreign commerce; or (3) which are used or could be used for industries in interstate commerce;
- All other impoundments of waters otherwise as defined as waters of the United States under the definition;
- Tributaries of waters identified above;
- The territorial seas; and
- Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in the paragraphs above [33 CFR Part 328.3(a)].

USACE also requires the delineation of non-wetland jurisdictional waters. These waters must have strong hydrology indicators such as the presence of seasonal flows and an ordinary high watermark. An ordinary high watermark is defined as:

> . . . that line on the shore established by the fluctuations of water and indicated by physical characteristics such as [a] clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (33 CFR Part 328.3).

Areas delineated as non-wetland jurisdictional waters may lack wetland vegetation or hydric soil characteristics. Hydric soil indicators may be missing, because topographic position precludes ponding and subsequent development of hydric soils. Absence of wetland vegetation can result from frequent scouring due to rapid water flow. These types of jurisdictional waters are delineated by the lateral and upstream/downstream extent of the ordinary high watermark of the particular drainage or depression.

b. U.S. Fish and Wildlife Service

Under Sections 7 and 10 of the Endangered Species Act, USFWS has regulatory authority over federally listed endangered or threatened plant and animal species. Specifically, Section 7 requires agencies to ensure that their activities are not likely to jeopardize the continued existence of listed species or impact designated critical habitats through consultation with the Service. When impacts are anticipated, an ITP must be authorized by USFWS under Section 10(a)1(A). An HCP must accompany the ITP under Section 10(a)(1)(B) to ensure that the authorized take is adequately mitigated and minimized. Therefore, impacts to any of the seven federally listed vernal pool species must be approved by USFWS, in addition to any other applicable Wildlife Agencies. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have “take” authority for the vernal pool species occurring within the HCP areas.

c. California Department of Fish and Wildlife

Under Sections 1600–1607 of the Fish and Game Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., riparian scrub) associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider.

d. Regional Water Quality Control Board

RWQCB is the regional agency responsible for protecting water quality in California. The jurisdiction of this agency includes all waters of the state and all waters of the United States as mandated by both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. State waters are all waters that meet one of three

criteria (hydrology, hydric soils, or wetland vegetation), and generally include but are not limited to, all waters under the jurisdiction of USACE and CDFW.

e. City of San Diego

According to the City of San Diego's Municipal Code (City of San Diego 2012a), wetlands are areas which are characterized by any of the following conditions: (1) all areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation; (2) areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic, or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats; removed the historic wetland vegetation; and (3) areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands; and (4) areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

5.4.1.5 Wildlife Movement and Corridors

Habitat linkages and wildlife corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Habitat linkages and wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies.

Within the CPU area, the Dennery and Spring canyons, connected by the Otay Mesa Road culvert and SR-905 wildlife crossing, are the primary north-south wildlife movement corridor in western Otay Mesa. Moody Canyon is connected to the eastern side of Spring Canyon and provides east-west wildlife movement within the CPU area. Dennery Canyon connects to the Otay River Valley along the northern boundary of the CPU area. The Otay River Valley provides a major movement corridor for east-west wildlife movement north of the CPU area and provides connectivity to a larger expanse of open space.

5.4.2 Regulatory Framework

5.4.2.1 Multiple Species Conservation Program

The MSCP is a comprehensive, habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby

protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an IA with USFWS and CDFW. The IA serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and subarea plan. The agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

a. Vernal Pool Lawsuit

In October of 2006, Judge Brewster issued a Decision and Injunction [Case No. 98-CV-2234-B(JMA)] in a lawsuit filed by the Southwest Center for Biological Diversity against the USFWS over the issuance of an ITP under Section 10 of the ESA to the City of San Diego based upon the MSCP. The lawsuit was limited to the seven vernal pool species including two crustacean species, San Diego fairy shrimp (*Branchinecta sandiegonensis*) and Riverside fairy shrimp (*Streptocephalus wootoni*), and five plant species: Otay mesa mint (*Pogogyne nuduliscula*), California Orcutt grass (*Orcuttii* californica), San Diego button celery (*Eryngium aristulatum*), San Diego mesa mint (*Pogogyne abramsii)*, and spreading navarretia (*Navarretia fossalis*).

The Court enjoined the City of San Diego's ITP for all pending and future development projects where "take" of any of the seven vernal pool species may occur, including:

- Pending applications for development of land containing vernal pool habitat.
- Projects where the City has granted permits, but development had not yet occurred.
- Future development where the permittee was engaged in the destruction of vernal pool habitat.

As a result of this ruling, numerous private and public development projects which contained vernal pool resources within their project site were enjoined. The Court determined that the City and USFWS were not providing adequate coverage under the

MSCP for vernal pool species. The following are the main inadequacies identified in the ruling:

- Mitigation was not beneficial and could not be modified for the life of the permit.
- Creation of vernal pools was not always feasible due to site conditions and the difficulty with creating the proper conditions to support vernal pool flora and fauna.
- Measures to determine impact allowance was arbitrary and did not provide the same level of protection for "unnatural" vernal pools.
- Funding was speculative.

All parties entered into mediation in 2007 which continued through 2009, when it ended in an impasse. During the mediation, it was determined that a Vernal Pool HCP should be prepared for the comprehensive protection of vernal pool resources. The City was awarded an Endangered Species Act Section 6 grant in 2009 for the preparation of a vernal pool HCP. In April 2010, the City entered into a Planning Agreement with the USFWS for the preparation of the vernal pool HCP. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies.

In April 2010, the City also relinquished federal coverage of the seven vernal pool species. In 2011, Judge Brewster vacated the 2006 ruling since the relevant portions (i.e., vernal pool species) of the City's ITP were no longer in effect. This partial relinquishment and cancellation of the ITP only applies to federal coverage of the seven vernal pool species; the remainder of the City's MSCP ITP was not affected. The City is still responsible for the management of vernal pool resources, including the seven vernal pool species, owned and/or conserved through the City's permitting process. State coverage of the seven vernal pool species remains in effect.

As of the date of surrender, April 20, 2010, the City has relinquished federal coverage and the USFWS does not rely on the City's federal ITP to authorize an incidental take of the two vernal pool animal species and five vernal pool plant species. Upon completion of a HCP for vernal pools, the City would enter into an IA in order to obtain species coverage and a federal ITP for the seven vernal pool species. Incidental take authorization for projects that affect the seven vernal pool species could also be authorized through a FESA Section 10(a) or a Section 7 consultation with the USFWS, initiated as part of the 404 permit process by the USACE. A Biological Opinion is issued that serves as the ITP.

b. Multi-Habitat Planning Area

The Multi-Habitat Planning Area (MHPA) is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's

MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]" (City of San Diego 1997).

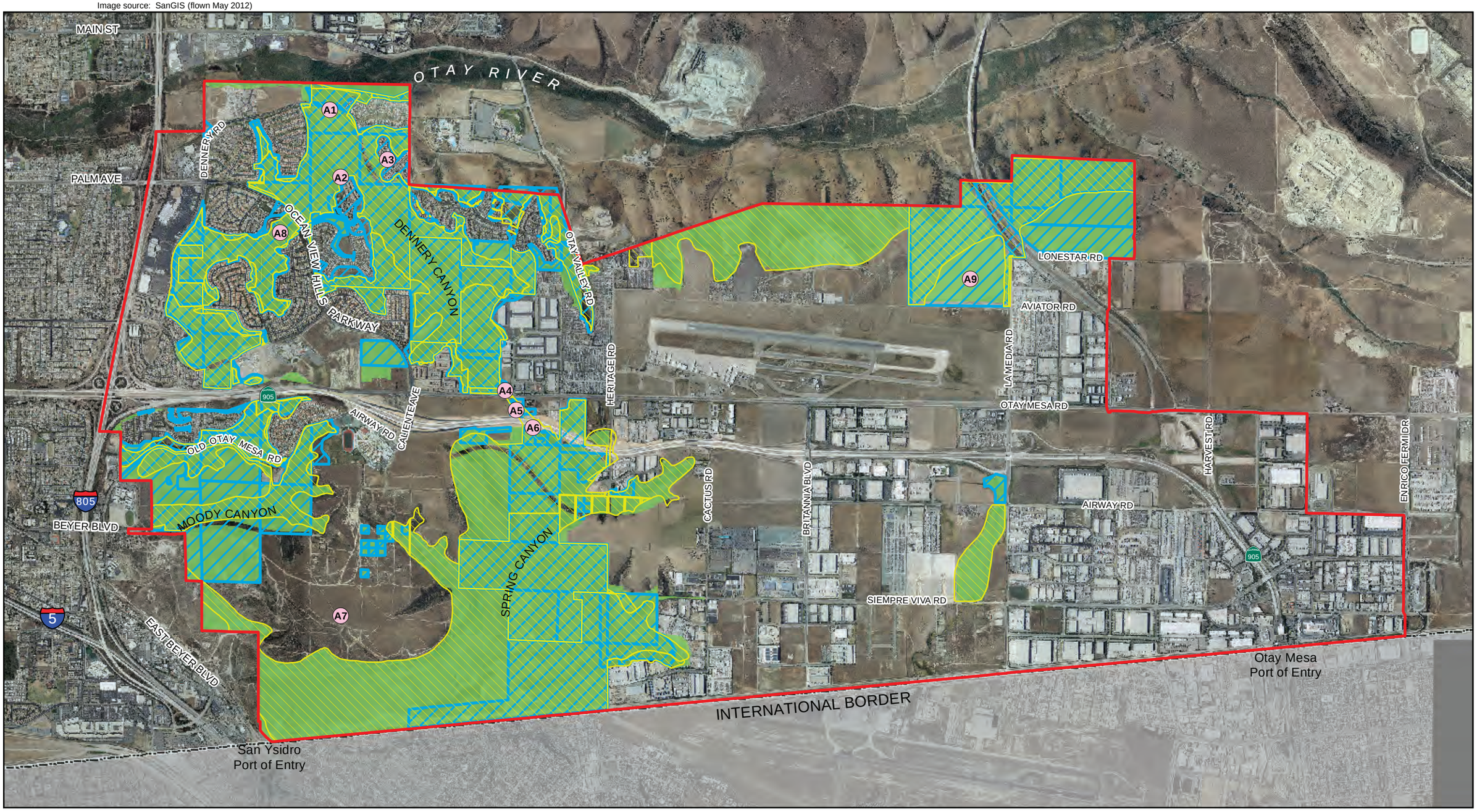
The MHPA consists of public and private lands, much of which has been conserved. Conserved lands shown on the SanGIS database (SanGIS 2013; Figure 5.4-5) include lands that have been set aside for mitigation or purchased for conservation. These lands may be owned by the City or other agencies, may have easements, may be dedicated, or may have some restrictions placed upon the property through the City's processes that protects the overall quality of the resources and prohibits development.

Private land within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.4.2 of the Final MSCP Plan (City of San Diego 1997). All MHPA boundary line adjustments require approval by the Wildlife Agencies and approval from a City discretionary hearing body.

A MHPA Boundary Line Correction within the south central CPU area was approved by the City and Wildlife Agencies on March 13, 2013. Due to a mapping registration error, the MHPA was mapped over 3.7 acres of existing development permitted as part of the International Business Center Project (EQD No. 86-0535) which was approved in the late 1980s. The MHPA boundary was shifted to the south in order to remove the approved developed area and to add the 10.8 acres in Wruck Canyon that had been conserved as part of the International Business Center Project. The correction resulted in a net gain of 7.1 acres within the MHPA.

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biological Guidelines (City of San Diego 2012a).

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

MHPA Specific Guideline Areas

City of San Diego MHPA

SANGIS Conserved Lands Database

Otay Mesa Community Land Use Plan

Open Space

0 Feet 2,500

FIGURE 5.4-5

Location of MHPA, SanGIS Conserved Lands, and Proposed Otay Mesa Community Plan Open Space

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The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

c. MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The MHPA adjacency guidelines are intended to be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) and applicable permits during the development review phase of a proposed project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development.

MSCP Subarea Plan: Otay Mesa MHPA Management Directives

Otay Mesa is in the southern area of the MHPA which also includes the Otay River Valley, Tijuana Estuary, and Tijuana River Valley. The plan describes the Otay Mesa areas of the MHPA and its vision as a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability. The City's MHPA Guidelines for Otay Mesa as described in Section 1.2.1 of the City's Subarea Plan (1997) are as follows:

1. Maintain and/or provide trail access for Border Patrol use around the rim of canyons, where feasible. Motorized off-road-vehicle use in the MHPA should be prohibited except by Border Patrol, MHPA (Preserve) managers, or emergency vehicles.

2. In the area south of proposed State Route (SR-905), minimize road crossings of Spring Canyon. Where road crossings must occur, use bridges or culverts (see #3 below). Manufactured slopes adjacent to roadways should be revegetated with appropriate native vegetation.

3. Unless noted otherwise, culvert dimensions should be at least 30 feet wide by 15 feet high, and where feasible, have a maximum 2:1 length to width ratio. The floor of the culvert must be natural/soft bottom, and the ceiling constructed using skylights where possible to provide adequate visibility for wildlife.

4. Vernal pool areas should be preserved per adopted regulations. Where development is considered, the vernal pools should be assessed for transplantation of sensitive flora and fauna. Any wetland impacts will be mitigated for losses to meet the state and federal goal of "no net loss of wetland function

and value." Mitigation should occur in accordance with requirements to be determined through the 404 and 1602 permitting process for individual projects.

In addition to the general MHPA Guidelines identified above, the City's MSCP identifies the following specific guidelines for the Otay Mesa area (see Figure 5.4-5 for locations of A1–A9):

A1. Improve the wildlife/pedestrian corridor in Dennery Canyon by incorporating two culverts in Dennery Canyon Road. Revegetate the disturbed portions of Dennery Canyon with coastal sage scrub species.

A2. Modify street alignments to retain additional natural areas. Reduced street classifications and roadbed widths where possible to reflect reduced development.

A3. The Robinhood Ridge project has a legal right to develop under an existing approved Tentative Map. In the event that the approved map expires, future development proposals would be required to conform to the MHPA boundaries depicted by the Subarea Plan and associated land use regulations.

A4. Provide a culvert under Otay Mesa Road to facilitate wildlife crossing. Ideally, the culvert would provide both limited pedestrian and wildlife access from the Otay River Valley Regional Park through Dennery Canyon to areas to the south in Spring Canyon. However, if this dimension is not possible due to engineering constraints, the culvert must be large enough to allow mid-size mammal and predator undercrossing.

A5. Enhance/restore disturbed areas within the wildlife crossing. This will entail revegetation with coastal sage scrub species and if necessary, possible experimental restoration of graded vernal pools immediately north of Otay Mesa Road. The revegetation effort should not use medium to tall shrubs and trees, to address Border Patrol concerns. Provide fencing to direct animals into the undercrossing.

A6. The SR-905 design shall include a bridge-type structure over the wildlife corridor south of Otay Mesa Road. This crossing shall be enhanced with grading and revegetation.

A7. Prior to any development impacts in this area, mitigation must include collecting and reseeding vernal pool species into other preserved Otay Mesa pools.

A8. Final configuration of this area is subject to redesign of approved maps.

A9. The MHPA designation on the Baldwin property at the far northeastern end of the Otay Mesa area will need to be fenced at the time of development. Depending on

> the future use of adjacent areas outside the MHPA, the frequency and monitoring for disturbance, fence repairs, and other maintenance will be determined at the time of development. Due to the sensitivity of the vernal pools and other sensitive species in this area, public access should be carefully directed.

MSCP Subarea Plan: Specific Management Policies and Directives for Otay Mesa

Section 1.5.3 of the City of San Diego MSCP Subarea Plan (1997) describes the specific management and directives for the Otay Mesa area. The major issues that require consideration for management in the Otay Mesa area include the following, in order of priority, as excerpted from Section 1.5.3 of the City of San Diego MSCP Subarea Plan (1997):

- Intense land uses and activities adjacent to and in covered species habitat and linkages;
- Off-road-vehicle activity;
- Dumping, litter, and vandalism;
- Enhancement and restoration needs;
- Exotic (non-native), invasive plants and animals;
- Illegal immigration and Border Patrol activities; and
- Utility, facility and road repair, construction, and maintenance activities.

MSCP Subarea Plan: Overall Management Policies and Directives for Otay Mesa

As described in the plan:

> The Otay Mesa Community Plan contains lists and maps of vernal pools and sensitive species, as well as descriptions of native vegetation, wildlife and the ecological significance of the Otay Mesa area. The MHPA boundaries closely follow the open space designation in the adopted plan for the area south of Otay Mesa Road but have made modifications in the north area by adding substantial areas for preservation.

General Policies

General Policies for the MHPA contained in Section 1.5.3 of the MSCP Subarea Plan include:

Priority 1:

1. No unauthorized motorized vehicles except Border Patrol, MHPA managers, maintenance personnel, or emergency vehicles will be allowed on any trails or off-trail in the MHPA. The Border Patrol should restrict vehicles to the existing access roads as much as feasible, to avoid disturbance of habitat.

2. Remove all trash, hazardous materials, and vehicles from the MHPA prior to transfer from private to public ownership and/or management. If hazardous materials remain, these areas should be signed to indicate their locations, and made off-limits to people.

3. Inventory vernal pool areas within the Otay Mesa area for sensitive and target species where not previously or recently done, and assess for enhancement/restoration needs or opportunities, general status, and potential threats.

Priority 2:

1. Assess vernal pool areas proposed for development (e.g., approved development projects or proposed regional transportation facilities such as SR-905 and SR-125) for transplantation of sensitive plants and soils containing seedbanks of sensitive flora and fauna. Include in mitigation programs arrangements for proper timing of soil and plant removal, proper storage if necessary, and appropriate timing of enhancement/restoration efforts, including transplantation.

Specific Management Directives for Otay Mesa

Specific Management Directives for Otay Mesa contained in Section 1.5.3 of the MSCP Subarea Plan are identified as follow:

Northwest Otay Mesa

Priority 1:

1. Protect the area with concentrations of *Ferocactus*, *Dudleya*, and succulents on the ridge located in the northeast corner of the California Terraces from trampling and poaching of plants. Provide barriers to this area that accommodate wildlife movement.

2. Regular enforcement patrols may be necessary in Dennery Canyon and its tributaries to prevent vandalism, poaching, and off-road-vehicle activity.

3. The wildlife crossings under Otay Mesa Road and SR-905 are the only link from south to north Otay Mesa. These crossings must be kept free of debris and illegal

encampments. Provide screening of this area along both sides from residential and other adjacent development, and provide limited cover for wildlife within the crossing area that is compatible with Border Patrol activities. Restrict night lighting near this crossing.

Priority 2:

1. Assess the need for access roads at the bottom of Dennery Canyon and its tributaries. Utilize to the extent possible utility maintenance and Border Patrol access roads as trail system. Restore any roads determined not to be necessary to serve these functions, and any duplicate roads to the appropriate local native habitat(s).

2. Restore the Bentonite mine and bench area in Dennery Canyon to the appropriate local native habitat. Restoration may require topsoil importation which could be provided from the surrounding development areas at the time of grading, as these soils would also contain the appropriate local seed bank.

Northeast Otay Mesa

Priority 1:

1. Delineate the MHPA boundaries along areas of the mesa and slopes north of Brown Field with markers and signs to inform Brown Field employees, contractors, and other people of the boundaries of the MHPA to prevent disturbance of the area. This area should be made off-limits to illegal tilling of the mesas (except where required for brush management), dumping, storage of materials, and other disturbances. Fencing or other protection mechanisms will only be necessary if continued disturbance of these areas is evident.

2. Retain mesa areas which are currently non-native grasslands in order to allow regeneration or continue in their present state, thus providing needed raptor foraging area. If regeneration to coastal sage or other native habitats appears to be unbalancing the need for grassland areas in the future, assess these areas for management that would maintain a grassland (preferably native) community.

Priority 2:

1. Evaluate the mesa north of Brown Field for potential research opportunities in studying natural regeneration. If regeneration is not possible, pursue restoration of disturbed habitats in this area.

Southern Otay Mesa

Priority 1:

1. Continuous coordination with the U.S. Border Patrol will be necessary to ensure continued awareness of the MHPA and cooperation in maintenance. The presence of the Border Patrol in this area should help to make the MHPA safe for visitors. If possible, improve coordination with the U.S. Border Patrol to aid in the identification and prevention of vandalism, off-road vehicle use, dumping, and other disturbances to habitat.

2. Install barriers and signage along Spring Canyon where agriculture or development abuts the MHPA.

Priority 2:

1. Provide educational materials and training on the MSCP and on native wildlife to U.S. Border Patrol agents and other public agency personnel working in the Otay Mesa border area to encourage sensitive behavior towards wildlife and its habitat, and to discourage unnecessary off-road vehicle use in sensitive areas.

2. Ensure that the night lighting along the border intrudes as little as possible on lands in the interior of the MHPA.

3. Assess and prioritize the Spring Canyon area for restoration of disturbed areas. Include existing roads and those determined not to be needed for Border Patrol activities in the restoration assessment. Burned areas should not need restoration, but off-road use and other disturbed areas should either be restored or other steps taken to encourage regeneration. This could offer potential research opportunities.

5.4.2.2 City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (LDC §143.0101 through §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 regulations are designed to ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats.

Within the CPU area, ESL resources include sensitive species and habitats, vernal pools and other wetlands, floodplains or areas of flooding, and steep hillsides. Many of the ESL resources are within the existing designated MHPA where development

encroachment is restricted to 25 percent in the least sensitive portion of the site. Compliance of the CPU with the ESL Regulations is detailed in Section 5.1.5 within this EIR.

Future development implemented in accordance with the CPU will be required to comply with the applicable sections of the ESL regulations related to biological resources, wetlands and the MSCP/MHPA.

5.4.2.3 City of San Diego General Plan Policies

The General Plan presents goals and policies for biological resources in the Conservation Element. Relevant excerpts from this element are included in Table 5.4-4 below.

TABLE 5.4-4
GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
CE-B.1	Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities. a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive land by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.

TABLE 5.4-4
GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES
(continued)

Policy	Description
CE-B.2	Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands. a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits. b. Limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.
CE-C.4	Manage wetland areas as described in Section H, Wetlands, for natural flood control and preservation of landforms.
CE-E.4	Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.
CE-E.7	Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.
CE-G.1	Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability. a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within open space.
CE-G.2	Prioritize, fund, acquire, and manage open spaces that preserve important ecological resources and provide habitat connectivity.
CE-G.3	Implement the conservation goals/policies of the City's MSCP Subarea Plan, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.
CE-G.4	Protect important ecological resources when applying floodplain regulations and development guidelines.
CE-G.5	Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.
CE-H.1	Use a watershed planning approach to preserve and enhance wetlands.
CE-H.2	Facilitate public-private partnerships that improve private, federal, state and local coordination through removal of jurisdictional barriers that limit effective wetland management.
CE-H.3	Seek state and federal legislation and funding that support efforts to research, classify, and map wetlands including vernal pools and their functions, and improve restoration and mitigation procedures.
CE-H.4	Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.
CE-H.5	Support research and demonstration projects that use created wetlands to help cleanse urban and storm water runoff, where not detrimental to natural upland and wetland habitats.

TABLE 5.4-4
GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES
(continued)

Policy	Description
CE-H.6	Support educational and technical assistance programs, for both planning and development professionals, and the general public, on wetlands protection in the land use planning and development process.
CE-H.7	Encourage site planning that maximizes the potential biological, historic, hydrological and land use benefits of wetlands.
CE-H.8	Implement a "no net loss" approach to wetlands conservation in accordance with all city, state, and federal regulations.

SOURCE: City of San Diego General Plan Conservation Element 2008.

5.4.3 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, impacts related to biological resources would be significant if the CPU would:

1. Result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals;

2. Result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species;

3. Result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral;

4. Affect the long-term conservation of biological resources as described in the MSCP, or conflict with the provisions of the MSCP Subarea Plan's Land Use Adjacency Guidelines or other approved local, regional, or state conservation plans;

5. Result in the introduction of invasive species of plants into the area;

6. Result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filing, hydrological interruption, or other means; or

7. Result in temporary construction noise from the CPU or permanent noise generators (including roads) that adversely impacts sensitive species (e.g., coastal California gnatcatcher) within the MHPA;

5.4.3.1 Criteria for Evaluating Biological Resources

Potential impacts to biological resources are evaluated through review of the project's consistency with the City's LDC ESL Regulations and Biology Guidelines as well as the MSCP Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources would be established. The criteria for evaluating a project's impact on biological resources resulting from CPU implementation would depend on whether:

- The site has been identified as part of the MHPA by the Subarea Plan.
- The site supports or could support Tier I, II, IIIA & B vegetation communities (such as grassland, chaparral, coastal sage scrub).
- The site contains, or comes within 100 feet of, a natural or man-made drainage (determine whether it is vegetated with wetland vegetation). The site lies within the 100-year floodplain established by FEMA and the Flood Plain Fringe/Flood Way zones.
- The site does not support a vegetation community covered under the MSCP; however, important wildlife species may use the site for a corridor, etc.

5.4.3.2 Biological Impacts

Once it has been established that biological resources are present on a project site, further analysis of a project's direct and/or indirect impact to biological resources would be required and a determination of significance made with respect to the resource being impacted.

Direct effects include, but are not limited to, the following impacts:

a. Direct Impacts

- Any encroachment in the MHPA is considered a significant impact to the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a MHPA boundary adjustment which would include a habitat equivalency assessment and concurrence by the Wildlife Agencies to ensure that lands added to the MHPA would be least equivalent to what would be removed.
- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.

- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to state or federally listed species and all narrow endemics should be considered significant.

- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

b. Indirect Impacts

Indirect effects include, but are not limited to, the following impacts:

- Introduction of urban meso-predators into a biological system
- Introduction of urban runoff into a biological system
- Introduction of invasive exotic plant species into a biological system
- Noise and lighting impacts
- Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles
- Loss of a wetland buffer that includes no environmentally sensitive lands

5.4.4 Issue 1: Sensitive Plants and Animals

Would the CPU result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

5.4.4.1 Impacts

The CPU presents goals and policies for biological resources in the Land Use, Urban Design, Recreation, and Conservation Elements. Relevant excerpts from this element are included in Table 5.4-5 below.

TABLE 5.4-5
CPU PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
LU 2.1-2	Achieve comprehensive neighborhood and community village development through Specific Plans that: a. Respect the natural topography and sensitive habitat areas with growth patterns that balance development with preservation of natural resources. b. Provide a land use map that illustrates the detailed land use designations, including any lands set aside for resource conservation consistent with any future Vernal Pool Habitat Conservation Plan. The specific plan land use map will refine the Otay Mesa Community Plan Land Use Map as part of the specific plan approval process. c. Illustrate a separate system of pedestrian and bicycle facilities and pathways linking the activity centers with the residential areas, public facilities, and open space systems.
LU 2.6-1	Maintain the existing open space, and collaborate with the Wildlife Agencies, environmental groups, and the public to ensure adequate conservation for sensitive biological resources.
LU 2.6-2	Create a close relationship between the natural environment of the Otay River Valley, Spring Canyon, and the Dennery Canyon systems and developed areas through the provision of multi-use trails and educational elements.
UD 4.1-2	Incorporate interpretive centers to provide educational information for sensitive resources within the Dennery Canyon system and the Otay River Valley as new development and redevelopment occurs.
UD 4.3-1	Employ sensitive design techniques when developing adjacent to Otay Mesa's natural canyon and open space systems.
RE 7.2-1	Balance goals to preserve MHPA and open space areas with opportunities for providing recreation. a. Maintain Spring Canyon and portions of the Otay Valley Regional Park in their natural state. Future uses should be compatible with the open space concept, and may include hiking, bicycling, and sightseeing. b. Create a close relationship between the natural environment of Spring Canyon and developed areas through an extensive parks, recreation, and open space system by connecting parks to open space trails, bike routes, and sidewalks.
RE 7.2-2	Minimize activities that require alterations to the natural open space.
RE 7.2-3	Require the sensitive placement of structures such as benches, picnic tables in open space areas.
RE 7.2-5	Support efforts to designate trails and create a comprehensive trails system within Spring Canyon and the Otay Valley Regional Park's Dennery Canyon open space areas.
CE 8.1.1	Implement the ESL Regulation related to biological resources and steep hillsides for all new development.
CE 8.1.2	Preserve a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability.
CE 8.1.4	Implement the MSCP Management Policies and Directives for Otay Mesa through the project review process.

TABLE 5.4-5
CPU PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES
(continued)

Policy	Description
CE 8.1.5	Implement City regulations and Biology Guidelines for preservation, acquisition, restoration, management, and monitoring of biological resources.
CE 8.1.6	Implement Area Specific Management Directives and Conditions of Coverage as stated in Table 3-5 of the MSCP Subarea Plan for species protected in Otay Mesa and identified in Table 8-1 of the CPU.
CE 8.1.7	Require preservation, restoration, management, and monitoring within identified vernal pool preservation areas in accordance with City, state, and federal policies and regulations. The boundaries of vernal pool preserve areas should be of sufficient size and shape to protect the vernal pool basins, watersheds, functional buffers, and areas necessary to maintain vernal pool ecosystem function and species viability. a. Design, as feasible, the preserve areas to provide connectivity between vernal pools, surrounding open space, and nearby vernal pool complexes. b. Conduct management and monitoring of preserved and restored vernal pool sites in accordance with the citywide regulations and Biology Guidelines.
CE 8.1.8	Amend the Otay Mesa Community Plan as needed for consistency with an adopted HCP.
CE 8.1.9	Foster local stewardship and develop positive neighborhood awareness of the open space preserve areas with environmental education programs through local schools, homeowners associations, community groups, and other public forums that address the local ecosystem and habitat preservation. Incorporate hands-on learning via neighborhood hikes or other initiatives that present information in a manner that will increase interest in the natural world.
CE 8.1.10	Require development to obtain all required state and federal permits.
CE 8.1.11	Encourage the development of a comprehensive approach to habitat identification, management, and establishment of preservation nodes in order to address long term survival of the burrowing owl on Otay Mesa.

Even with the implementation of the aforementioned policies, impacts to unique, rare, endangered, sensitive, or fully protected species of plants or animals would occur with implementation of the CPU as described below. Due to the fact that portions of the biological resource assessment are based on secondary source information rather than site-specific field surveys, the impacts would be refined for individual projects. Instead, the program-level analysis identifies areas of potential impacts associated with implementation of the overall CPU. Site-specific surveys would be conducted for future project-level review to verify the presence of sensitive plant species occurring on individual properties and determine the extent of any potential impacts.

a. Impacts to Sensitive Plants

Implementation of the CPU has the potential to impact 17 sensitive plant species known to occur within the CPU area. Precise locations of sensitive plant species would be identified through on-site reconnaissance in conjunction with future development.

Ten of the plant species are federally and/or state listed and MSCP-covered species. These include:

Otay tarplant is state listed as endangered and federally listed as threatened (State of California 2012b). It is considered a narrow endemic species under the MCSP and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California or elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). Habitat for this species is coastal sage scrub, valley and foothill grasslands in clay soils.

San Diego ambrosia (*Ambrosia pumila*). San Diego ambrosia is federally listed as endangered (State of California 2012b). It is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California and elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). Habitat for this species is disturbed areas in chaparral, coastal scrub, grassland, or vernal pool communities or along creek beds, seasonally dry drainages, and floodplains along the edge of willow woodland, in riverwash or sandy alluvial soils.

Variegated dudleya is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.2 (Rare, threatened, or endangered in California or elsewhere; fairly endangered in California) (City of San Diego 1997; CNPS 2012). It can be found in openings in chaparral, coastal sage scrub, grasslands, or vernal pool habitats.

San Diego button-celery is federally and state listed as endangered (State of California 2012b). It is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California or elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). It is found in vernal pools and wet areas within coastal sage scrub and grasslands.

Spreading navarretia is federally listed as threatened, is considered a narrow endemic species under the MSCP, and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California and elsewhere; seriously endangered in California) (State of California 2012b; City of San Diego 1997; CNPS 2012). Its habitat is vernal pools, marshes, and swamps. A portion of the Otay Mesa area has been designated as critical habitat by the USFWS for spreading navarretia (see Figure 5.4-3).

California Orcutt grass is a state and federally endangered species (State of California 2012b). It is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California and elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). This species grows in vernal pools.

Otay mesa mint is state and federally listed as an endangered species and has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California and elsewhere; seriously endangered in California) (State of California 2012b; CNPS 2012). It is considered a narrow endemic under the MSCP (City of San Diego 1997). This plant grows in vernal pools.

Small-leaved rose is state listed as endangered, covered under the MSCP, and has a CNPS Rare Plant Ranking of 2.1 (Rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California) (State of California 2012b; City of San Diego 1997; CNPS 2012). Its habitat is coastal sage scrub. It is known in California from only one occurrence on Otay Mesa. Because the only location of this species is part of a translocation program within the Ocean View Hills project (approved and built), impacts would not be anticipated.

San Diego goldenstar is a covered species under the MSCP and has a CNPS Rare Plant Ranking of 2.1 (Rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). It occurs in chaparral, coastal sage scrub, grasslands, and vernal pool habitats.

San Diego barrel cactus is a covered species under the MSCP and has a CNPS Rare Plant Ranking of 2.1 (Rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California) (City of San Diego 1997; CNPS 2012). It is found in chaparral, coastal sage scrub, grassland, and vernal pool habitats.

Additional plant species are not covered in the MSCP, but considered rare and occurring on the CNPS List. These include:

South coast saltscale has a CNPS Rare Plant Ranking of 1B.2 (Rare, threatened, or endangered in California, but more common elsewhere; fairly endangered in California). It is found in coastal sage scrub habitat (CNPS 2012).

Nuttall's scrub oak has a CNPS Rare Plant Ranking of 1B.1 (Rare, threatened, or endangered in California and elsewhere; seriously endangered in California) (CNPS 2012). It is found in chaparral and coastal sage scrub habitats.

San Diego bur-sage has a CNPS Rare Plant Ranking of 2.1 (Rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California). It is found in coastal sage scrub (CNPS 2012).

Golden-spined cereus has a CNPS Rare Plant Ranking of 2.2 (Rare, threatened, or endangered in California, but more common elsewhere; fairly endangered in California). It is found in chaparral and coastal sage scrub (CNPS 2012).

Cliff spurge has a CNPS Rare Plant Ranking of 2.2 (Rare, threatened, or endangered in California, but more common elsewhere; fairly endangered in California). It is found in coastal sage scrub and maritime succulent scrub (CNPS 2012).

Little mousetail has a CNPS Rare Plant Ranking of 3.1 (Needs review; seriously endangered in California). It is found in vernal pools and grasslands (CNPS 2012).

San Diego County viguiera has a CNPS Rare Plant Ranking of 4.2 (Uncommon in California; fairly endangered in California). It is found in chaparral and coastal sage scrub (CNPS 2012).

b. Impacts to Sensitive Wildlife

Implementation of the CPU has the potential to impact sensitive wildlife species known to occur within the CPU area. Precise locations of sensitive wildlife species and suitable habitat would be identified through on-site reconnaissance in conjunction with future development. Potentially affected species and suitable habitat are described below.

Federally Listed Endangered Species

The federally endangered Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, and least Bell's vireo could be impacted with future development implemented in accordance with the CPU. Impacts to the San Diego fairy shrimp, Riverside fairy shrimp, least Bell's vireo, and Quino checkerspot butterfly must be approved by USFWS under Section 7 or 10 of the federal Endangered Species Act. Impacts to least Bell's vireo must comply with the provisions of the MSCP.

The San Diego fairy shrimp and Riverside fairy shrimp are federally listed endangered species. The City relinquished federal coverage of these species in the MSCP, but has retained state coverage through the MSCP. They are both associated with vernal pool habitat and have designated critical habitat in Otay Mesa (see Figure 5.4-4).

The Quino checkerspot butterfly is also a federally listed endangered species and a non-covered species in the MSCP. It occurs in open dry areas of the mesa and has designated critical habitat in the northeastern corner of the CPU area (see Figure 5.4-4).

The least Bell's vireo is a federally and state listed endangered species and an MSCP covered species that could nest in the CPU. It is a migratory species and summer resident in riparian woodlands dominated by willows.

Federally Listed Threatened Species

The coastal California gnatcatcher, a federally listed threatened species, CDFW listed species of special concern, and MSCP covered species, could be impacted with future development implemented in accordance with the CPU. Coastal sage scrub and maritime succulent scrub habitat occupied by the coastal California gnatcatcher occurs in the CPU area. Direct impacts to occupied habitat that occurs in an MHPA area could be impacted under the proposed CPU. Indirect impacts (temporary construction noise) may occur to this species if construction occurs during the breeding season.

State Listed Endangered Species

The least Bell's vireo is a federally and state listed endangered species and an MSCP covered species that could nest in the CPU area. As such, impacts to least Bell's vireo must comply with the federal and state regulations regarding take of a listed species.

CDFW Species of Special Concern

The western burrowing owl is a CDFW species of special concern, USFWS bird of conservation concern, and MSCP covered species that is known to occur within the CPU area. The western burrowing owl occupies open areas, including native and non-native grassland, sparsely vegetated shrubland, agricultural land, and disturbed habitat. They typically nest in ground squirrel or other small mammal burrows, but may dig their own nests in soft soil or use culverts or drainage pipes. The burrowing owl population located within the Otay Mesa area is the largest remaining population of this species in San Diego County (Unitt 2004).

Impacts to burrowing owls would include not only direct impacts to individuals, nests, and suitable nesting habitat, but also indirect impacts from "eradication of host burrowers; changes in vegetation management (i.e., grazing); use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in the harassment of owls at occupied burrows" (CDFW 2012). Implementation of the CPU may result in impacts to 1,230.4 acres of non-native grassland, 110.7 acres of agricultural land, and 374.2 acres of disturbed land. Impacts to non-native grassland would affect the preferred habitat of the burrowing owl and would likely reduce population numbers. Although the species prefers grasslands, it is also known to use agricultural lands and disturbed lands when suitable grassland habitat is not available near an occupied area. Therefore, impacts to agricultural and disturbed lands need to be evaluated for their potential to support the burrow owl.

Future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental

regulations for CPIOZ Type A (ministerial). This includes a requirement for submittal of a Focused Burrowing Owl Survey prepared by a qualified biologist in accordance with the City's Biology Guidelines that determines there are no burrowing owls present on the project site. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B. Both processes are further described in Section 3.0, Project Description. In addition, as part of the environmental analysis for future subsequent development projects implemented in accordance with the CPU (CPIOZ Type B), burrowing owl surveys would be required to be conducted in suitable habitat to determine if this species is present and to locate active burrows and burrow complexes. If burrowing owls are present, mitigation measures must be implemented, including avoidance of impacts inside the MHPA. Outside the MHPA, impacts must be avoided to the maximum extent practicable by the relocation of owls out of impact areas by trained professionals and the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management, and enhancement of burrowing owl nesting and foraging requirements to compensate for lost habitat. Management plans and directives must be prepared for these burrowing owl conservation lands in accordance with CDFW's staff report for burrowing owls dated March 2012 and would be subject to approval by the Wildlife Agencies.

Raptors, including the Cooper's hawk and northern harrier, are known to forage in the CPU area and may nest in suitable habitats within the CPU area. Cooper's hawk is a CDFW species of concern, USFWS bird of conservation concern, and MSCP covered year-round resident in San Diego. The Cooper's hawk habitat includes mature forest, open woodlands, woodland edges, parks, and residential areas. The northern harrier is a CDFW species of concern and MSCP covered migrant and winter resident in San Diego. The northern harrier occupies coastal lowlands, marshes, grassland, and agricultural fields. The CPU would remove up to approximately 1,459.53 acres of foraging habitat for birds of prey (including approximately 1,230.4 acres of non-native grasslands and 229.13 acres of scrubland). In compliance with the Migratory Bird Treaty Act (MBTA) and Section 3503 of the California Fish and Game Code, no active nests of migratory bird species may be impacted during project construction.

Coastal cactus wren is CDFW species of special concern, USFWS bird of conservation concern and MSCP covered species. It occupies maritime succulent scrub and coastal sage scrub. Any impacts to these habitat types could potentially impact the coastal cactus wren.

Additional CDFW species of special concern occurring in the CPU area include San Diego horned lizard and Belding's orange-throated whiptail. Both are MSCP-covered and occupy chaparral and coastal sage scrub habitats.

Others include western spadefoot, Coronado skink, red diamond rattlesnake, loggerhead shrike (USFWS bird of conservation concern), yellow-breasted chat, northwestern San

Diego pocket mouse, San Diego woodrat, and San Diego black-tailed jackrabbit. These species are not covered by the MSCP.

CDFW Fully Protected Species

Other raptors, such as the golden eagle (CDFW fully protected species and species of special concern; USFWS bird of conservation concern; MSCP covered) and white-tailed kite (CDFW fully protected species), may nest or winter in the CPU area. The golden eagle requires vast foraging areas in grassland, broken chaparral, or sage scrub. It nests in cliffs and trees.

Other MSCP Covered Species

Southern California rufous-crowned sparrow is a CDFW watch list and MSCP covered species that occupies coastal sage scrub, chaparral and grassland.

Other Non-covered Sensitive Species

These include species listed or considered sensitive but are not covered in the City's MSCP: great egret; black-crowned night heron; prairie falcon (CDFW watch list; federal bird of conservation concern); California horned lark (CDFW watch list) in addition to the species listed above.

Indirect Impacts

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. These secondary effects of development may include habitat insularization, drainage/water quality impacts, lighting, noise, roadkill, exotic plant species, nuisance animal species, and human intrusion. These impacts would be short-term, resulting from construction activities, or long-term. Short-term construction impacts would result in disruption of nesting and breeding and would thus affect the population of sensitive species. To address this concern, the MSCP includes a set of Land Use Adjacency Guidelines that would be evaluated and implemented at the project-level. Indirect impacts are discussed in more detail in Sections 5.4.7, 5.4.8, and 5.4.10.

TABLE 5.4-6
POTENTIAL IMPACTS TO VEGETATION COMMUNITIES AND LAND COVER TYPES WITHIN THE CPU

Vegetation Communities/ Land Cover Type	CPU Impact Area		Total
	Inside MHPA*	Outside MHPA	
Non-native grassland	10.9	1,219.5	1,230.4
Diegan coastal sage scrub	1.4	160.6	162
Disturbed land	0	374.2	374.2
Maritime succulent scrub	0.78	64.7	65.48
Agriculture	0.1	110.6	110.7
Riparian	0.35	0	0.35
Non-native vegetation	0	0.1	0.1
Vernal pool	0.05	2.9	2.95
Basin with fairy shrimp	0**	0.7	0.7
Mule fat scrub	1.3	0	1.3
Alkali Seep	0	0	0
Freshwater marsh	0	0	0
Eucalyptus woodland	0	0	0
TOTAL	**15**	**1,933**	**1,948**

*Lands within the MHPA that have not been 100 percent conserved have the potential for a 25 percent loss in the least sensitive area due to allowable encroachment under the MSCP.
**Impact acreage less than 0.01.
†Total numbers have been rounded to the nearest whole number.

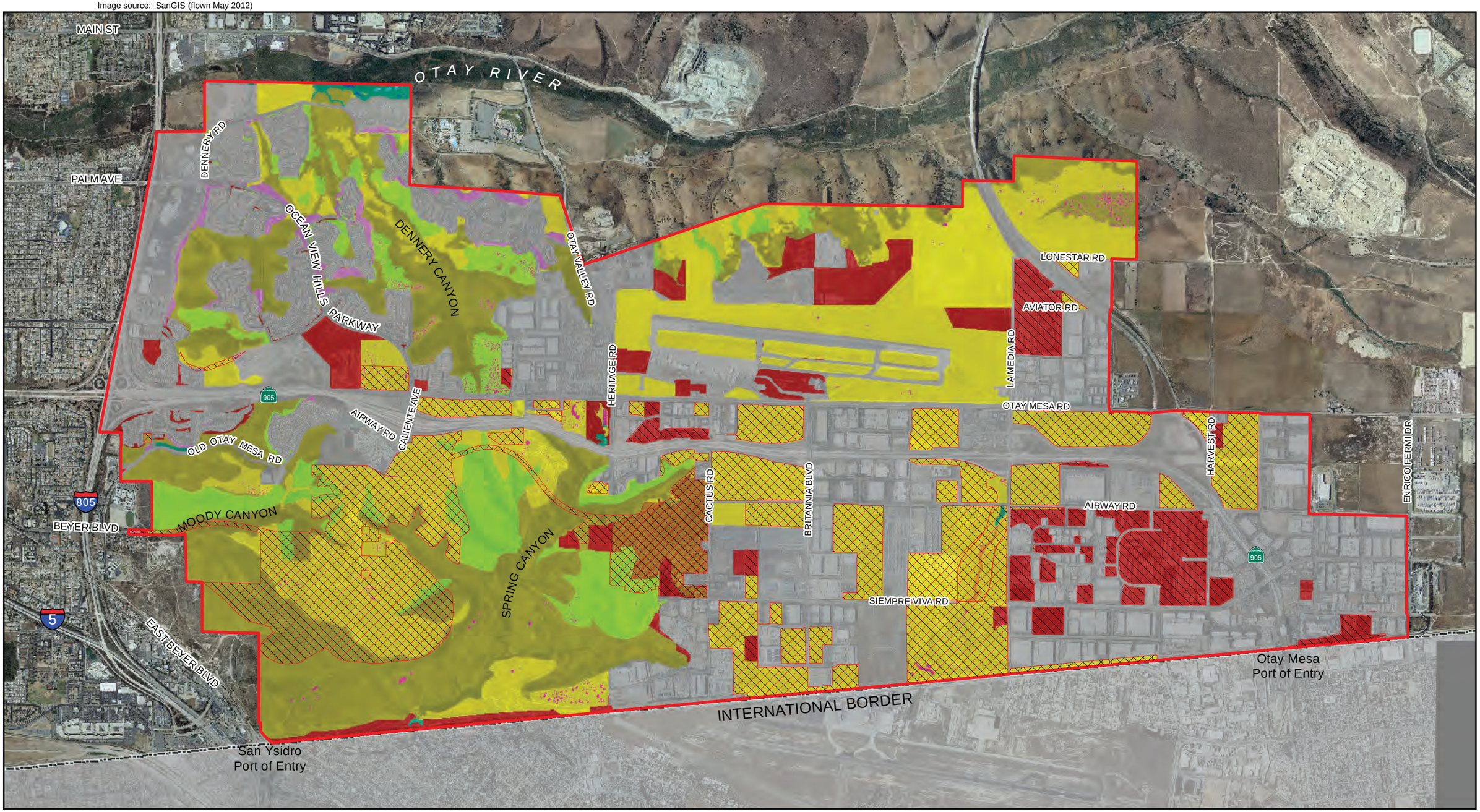
The CPU incorporates several policies related to the protection of sensitive habitats, as described in Section 5.4.4. Even with the implementation of the aforementioned policies, implementation of the CPU has the potential to result in the loss of sensitive vegetation communities (Figures 5.4-6 and 5.4-7) in the CPU area as shown in Table 5.4-6.

Figure 5.4-7 shows the impacts to sensitive vegetation communities, as classified by the MSCP. As previously detailed in Section 5.4.1.2, upland communities within the MSCP are divided into four tiers of sensitivity based on rarity and ecological importance (City of San Diego 2012a). Tier I is the most sensitive and Tier IV is the least sensitivity. Potential impacts to sensitive vegetation communities would include the loss of basins with fairy shrimp, Diegan coastal sage scrub, maritime succulent scrub, non-native grassland, and riparian. Impacts to wetlands, including vernal pools, are discussed in Section 5.4.9. Impacts to sensitive vegetation communities would be significant.

5.4.4.2 Significance of Impacts

Implementation of the CPU has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA. Potential impacts to federal or state listed species, MSCP covered species, or species with a CNPS Rare Plant Ranking would be significant. Plant species potentially impacted are listed in Table 5.4-2.

Image source: SanGIS (flown May 2012)



Project Boundary

Proposed Impacts

Vegetation Communities and Land Cover Types

- Alkali Seep
- Coastal and Valley Freshwater Marsh
- Diegan Coastal Sage Scrub
- Eucalyptus Woodland
- Maritime Succulent Scrub
- Mule Fat Scrub
- Non-native Grassland
- Non-native Vegetation
- Riparian
- Southern Mixed Chaparral
- Vernal Pool
- Agriculture
- Disturbed Land
- Urban/Developed

0 Feet 2,500

FIGURE 5.4-6

Impacts to Vegetation Communities and Land Cover Types

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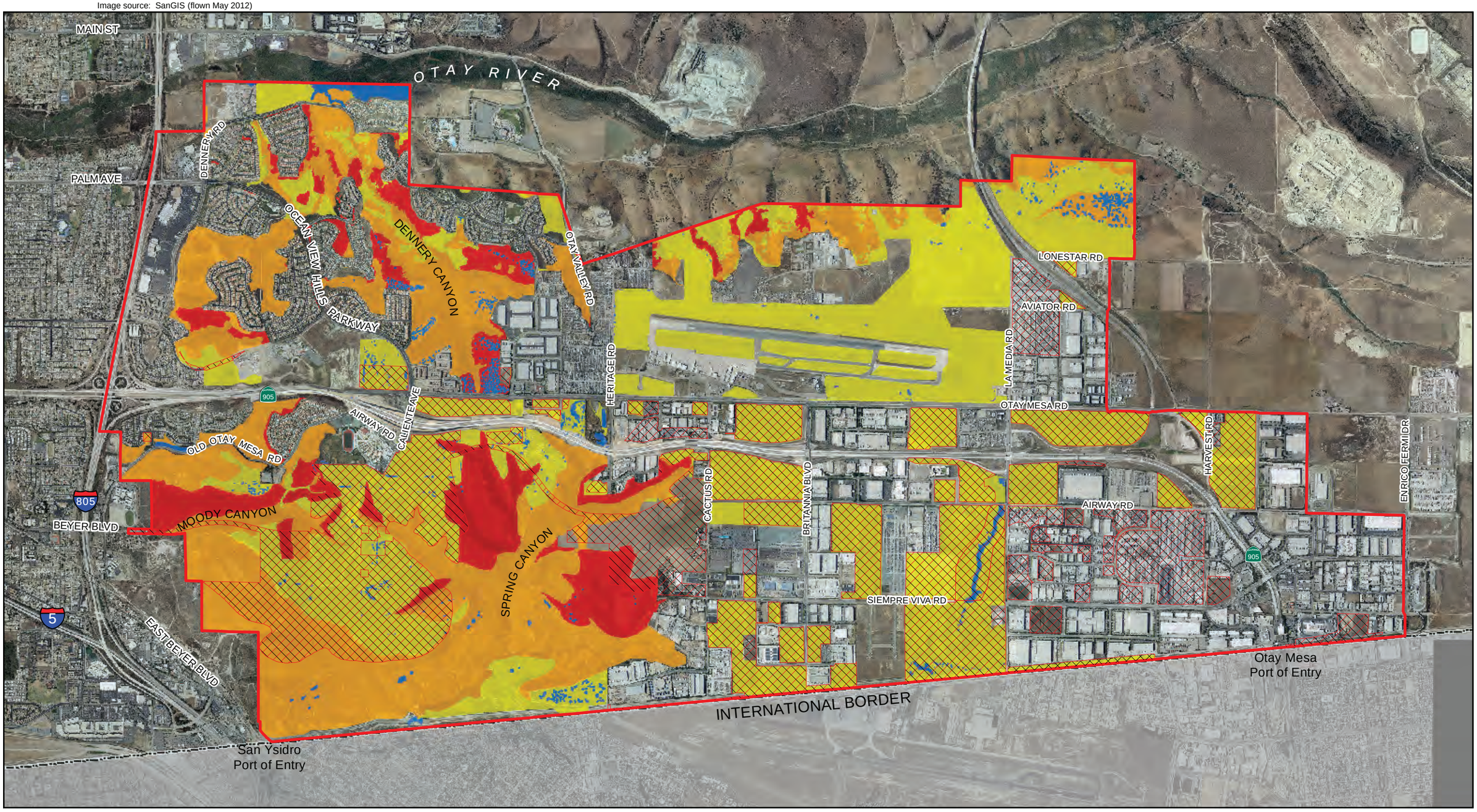
Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Proposed Impacts

Vegetation Classification

- Tier I Uplands
- Tier II Uplands
- Tier IIIA Uplands
- Tier IIIB Uplands
- Wetlands

0 Feet 2,500

FIGURE 5.4-7

Impacts to Sensitive Vegetation Communities

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Wildlife species include: coastal California gnatcatcher, Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, San Diego horned lizard, Belding's orange-throated whiptail, western burrowing owl, coastal cactus wren, northern harrier, Cooper's hawk, golden eagle, least Bell's vireo, and southern California rufous-crowned sparrow. Impacts to those wildlife species listed in Table 5.4-3 not listed above would be adverse, though not significant, due to their lower sensitivity ratings and the fact that suitable habitat would be preserved in the MHPA to compensate for loss of sensitive habitat (see Issue 3). It should be noted however, that for future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no biological resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.

5.4.4.3 Mitigation Framework

Mitigation is required for impacts that are considered significant under the City of San Diego's Biology Guidelines (2012) and the City of San Diego's CEQA Significance Determination Thresholds (2011d). All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no biological resources are present, the project can be processed ministerially and would not be subject to further environmental review under CEQA. Future development which does not comply with CPIOZ Type A shall be subject to review in accordance with CPIOZ B and shall implement the Biological Resources Mitigation Framework detailed below. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures typically employed include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat, or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank. Mitigation measures shall be determined and implemented at the project-level. Adherence to the recommendations below is anticipated to minimize impacts to sensitive biological resources.

BIO-1: To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the CPU area, all subsequent projects implemented in accordance with the CPU shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within CPU area, focused presence/absence surveys shall be conducted in

accordance with the biology guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of Burrowing Owls on the project site. Future projects shall be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts.

Mitigation for Impacts to Sensitive Upland Habitats

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

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

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

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

Mitigation for Impacts to Wetlands

Please refer to Mitigation Framework BIO-4 in Section 5.4.9, Wetlands.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction

Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo burrowing owl, and the cactus wren are further detailed in LU-2 and BIO-2.

TABLE 5.4-7
MITIGATION RATIOS FOR IMPACTS TO UPLAND VEGETATION COMMUNITIES AND LAND COVER TYPES

Tier	Habitat Type	Mitigation Ratios			
TIER 1 (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Location of Preservation		Inside	Outside
		Location	Inside	2:1	3:1
			Outside	1:1	2:1
TIER II (uncommon uplands)	Coastal Sage Scrub Coastal Sage Scrub/ Chaparral	Location of Preservation		Inside	Outside
		Location	Inside*	1:1	2:1
			Outside	1:1	1.5:1
TIER III A (common uplands)	Mixed Chaparral Chamise Chaparral	Location of Preservation		Inside	Outside
		Location	Inside*	2:1	3:1
			Outside	1:1	2:1
TIER III B (common uplands)	Non-Native Grasslands	Location of Preservation		Inside	Outside
		Location	Inside*	1:1	1.5:1
		Outside		0.5:1	1:1

Notes:
For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

5.4.4.4 Significance after Mitigation

Future commercial, business park and industrial development applications for properties that are subject to the CPIOZ and that are consistent with the CPU zone regulations, and the supplemental CPIOZ regulations, would be processed ministerially (CPIOZ Type A) in accordance with the procedures of the CPIOZ which requires preparation and submittal of a focused biological resources survey to determine presence or absence of sensitive plants and animal species. Future development proposal that do not comply

with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone would apply for a CPIOZ Type B permit and would be required to obtain discretionary approval through a Site Development Permit. Implementation of the CPIOZ would ensure consistency of all future development with CPU goals and policies. Although implementation of the CPU has the potential to result in significant direct and indirect impacts to sensitive plant and animal species, which can be mitigated at the project-level, these projects would be required to implement the Mitigation Framework identified in the MMRP, which requires site-specific environmental review, analysis of potential impacts to biological resources, and recommendations for mitigation to reduce significant project-level biological resource impacts to below a level of significance.

5.4.5 Issue 2: Migratory Wildlife

Would the CPU result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species?

5.4.5.1 Impacts

The CPU incorporates policies (detailed in Table 5.4-5) related to the protection of wildlife species, sensitive habitats, and wildlife movement corridors, as described in Section 5.4.4. Even with the implementation of the aforementioned policies, impacts to wildlife nesting, foraging, and movement have potential to occur with implementation of the CPU as described below. The program-level analysis identifies areas of potential impacts associated with implementation of the CPU. Site-specific analysis would be conducted for subsequent projects implemented in accordance with the CPU to determine the extent of impacts to wildlife nesting, foraging, and movement.

a. Nesting and Foraging Impacts

Undeveloped portions of the CPU area support a variety of habitats on both the mesa tops and canyon areas. Mesa top lands generally support non-native grasslands, vernal pools, agricultural and disturbed habitat that are considered valuable foraging area for raptors and provide food and cover for other wildlife. Wetlands provide a water source, as well as food, cover, and perching habitat. Canyon areas, which generally support the more dense habitats such as coastal sage scrub and maritime succulent scrub, also provide food, cover, and perching habitat. These canyon areas also provide corridors for wildlife movement. A variety of birds, including sensitive species, raptors, and other resident and migratory birds, are likely to nest in this vegetation in the CPU area. Impacts from noise and construction activity resulting from future development under the CPU would occur if construction occurs during the raptor or migratory bird nesting season.

Implementation of the CPU would remove foraging habitat for birds of prey. Loss of upland habitat resulting from future development implemented in accordance with the CPU would contribute to a cumulative loss of raptor foraging areas.

b. Wildlife Movement Impacts

Wildlife movement within the CPU area focuses on the canyon areas, which are part of the adopted MHPA open space system. This MHPA network in the Otay Mesa area, along with the City of Chula Vista's and County's MSCP Subarea Preserve Areas, which are contiguous to the northeast portion of the CPU, is planned to link to the regionally significant Otay River Valley. Dennery and Spring canyons, and the smaller canyons along the northern boundary that drain into Otay River Valley are key local components of the wildlife movement corridors within the MHPA network. The CPU maintains the planned habitat linkage corridors of the MHPA in terms of location and acreage; however, CPU Mobility Element roads, utility lines, and/or temporary construction activities within the MHPA have the potential to impact wildlife movement directly as a result of habitat loss or fragmentation.

Several of the CPU Mobility Element roads are planned within, adjacent to or would cross MHPA. Some of these lands have been conserved as shown on Figure 5.4-5. These roads are currently in various stages of development and include the following:

- The Beyer Boulevard alignment would run along Moody Canyon within the MHPA.
- Airway Road would cross the northern tip of the Spring Canyon within the MHPA and connect with Heritage/Otay Valley Road.
- Otay Mesa Road, Ocean View Hills Parkway, and Del Sol Boulevard would cross Moody Canyon within the MHPA.
- Dennery Road would run through the Dennery Canyon within the MHPA.
- The northern extension of Heritage/Otay Valley Road would extend into the Otay River Valley and run along the edge of a portion of the MHPA within the CPU area. Heritage Road would cross Spring Canyon within the MHPA.
- Portions of La Media Road and Siempre Viva Road would run close to MHPA areas but would not cross them.

According to the MSCP Subarea Plan, roads in the MHPA are limited to Community Plan Circulation/Mobility Element roads, collector streets, and necessary maintenance or emergency access roads. The MSCP identifies several policies aimed at protecting the integrity of the wildlife corridors. Such policies address minimizing disruption caused by construction and staging areas; avoiding canyon bottoms and allowing wildlife

movement through use of bridges or culverts where roads cross the MHPA; narrowing of roads to minimize habitat fragmentation and disruption of wildlife movement; and placing roads in lower quality habitat or disturbed areas to the extent possible.

5.4.5.2 Significance of Impacts

Future development, including construction or extension of CPU Mobility Element roadways, utility lines, and/or temporary construction activities within the MHPA, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss and/or fragmentation. Any direct or indirect impacts to migratory wildlife nesting, foraging, and movement would be significant.

5.4.5.3 Mitigation Framework

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

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

5.4.5.4 Significance after Mitigation

Compliance with CPU policies and established development standards and regulations including ESL, MSCP, the City's Biology Guidelines, and the Mitigation Framework would serve to reduce impacts at the program-level to below a level of significance.

5.4.6 Issue 3: Sensitive Habitat

Would the CPU result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral?

5.4.6.1 Impacts

The CPU would impact a maximum of 1,948 acres of the 9,302-acre study area (see Figure 5.4-6). Table 5.4-6, above, summarizes the acreage of vegetation communities and land cover types that would be impacted by build-out of the CPU. The impact footprint does not include land characterized as developed (i.e., developed or entitled with approved development permits, but not currently built/graded) or ornamental/landscape vegetation, as only impacts to sensitive vegetation communities or habitat as defined by the City's Biology Guidelines and ESL Regulations would be considered significant.

The CPU incorporates several policies related to the protection of sensitive habitats, as described in Section 5.4.4. Even with the implementation of the aforementioned policies, implementation of the CPU has the potential to result in the loss of sensitive vegetation communities (see Figure 5.4-6) in the CPU area.

Figure 5.4-7 shows the impacts to sensitive vegetation communities, as classified by the MSCP.

5.4.6.2 Significance of Impacts

Impacts to Tier I, II, IIIA, and IIIB habitats would be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Impacts to wetlands are discussed below in Section 5.4.9.

5.4.6.3 Mitigation Framework

Potential impacts to biological resources are evaluated through review of the project's consistency with the City's Land Development Code ESL Regulations and Biology Guidelines as well as the MSCP Subarea Plan.

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

5.4.6.4 Significance after Mitigation

Compliance with CPU policies and established development standards and regulations, along with implementation of the Mitigation Framework detailed in BIO-1 would serve to

reduce impacts to sensitive vegetation communities at the program level to below a level of significance.

5.4.7 Issue 4: MSCP

Would the CPU affect the long-term conservation of biological resources as described in the MSCP? Would the CPU meet the objectives of the MSCP Subarea Plan's Land Use Adjacency Guidelines or conflict with the provisions of the MSCP Subarea Plan, or other approved local, regional, or state conservation plans?

5.4.7.1 Impacts

The relationship of the CPU and the MSCP and designated MHPA is discussed in detail in Section 5.1, Land Use. An overview of the land use issues are provided below.

a. MHPA

Boundary Adjustments

As described in Section 5.1.6, Land Use, future development implemented in accordance with the CPU may propose an adjustment(s) to the MHPA boundary, thus removing MHPA preserve in some locations and adding MHPA preserve in other locations. Provisions in the MSCP Subarea Plan require that any modification to the MHPA boundaries result in equal or better biological values; therefore, boundary adjustments associated with future development would not result in significant direct or indirect impacts associated with environmental or habitat conservation plans. Potential impacts to MHPA preserve configuration as a result of MHPA boundary adjustments would be less than significant, because the adjustment must meet the required MHPA boundary line equivalency analysis and obtain approval from the Wildlife Agencies. Potential impacts to sensitive vegetation and species would be analyzed and mitigated consistent with mitigation measure BIO-1.

MHPA Land Use Adjacency Guidelines

As described in Section 5.1.6, Land Use, the MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. To address these concerns, the MSCP includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project-level.

Indirect effects can occur wherever development and human activity is adjacent to natural areas. These effects include increased runoff, trampling and removal of plant cover due to hiking, biking and other human activities, increased presence of toxins, increased nighttime light levels, and redirection or blockage of wildlife movement,

increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. The MHPA Land Use Adjacency Guidelines require certain measures to be incorporated in the design of projects adjacent to the MHPA to reduce indirect impacts, however, not to below a level of significance at the program-level.

Future development proposals would be required to address indirect impacts and incorporate the MHPA Land Use Adjacency Guidelines. However, as implementation of the CPU would introduce land uses adjacent to MHPA, this is a potentially significant impact at the program-level.

b. Specific Management Directives for Otay Mesa

As described in Section 5.1.6, the MSCP envisions "a network of open and relatively undisturbed canyons containing a full ensemble of native species which provide functional wildlife habitat and movement capability." Specific Management Directives are aimed at carrying out this vision and include measures to protect sensitive species, limit access into the canyons, provide wildlife crossing under Otay Mesa Road/SR-905, and address regeneration and restoration. The CPU would be generally consistent with the vision of the Otay Mesa MHPA; therefore, there are no significant, direct impacts anticipated to the MHPA.

5.4.7.2 Significance of Impacts

a. MHPA

Boundary Adjustments

Potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because the adjustment must meet the required equivalency criteria for approval.

MHPA Land Use Adjacency Guidelines

MHPA adjacency impacts would be addressed at the project-level. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that would demonstrate compliance with the MHPA Land Use Adjacency Guidelines. To ensure avoidance or reduction of the potential MHPA impacts resulting from new development adjacent to the MHPA, future projects would be required to comply with Mitigation Framework measure LU-2. Therefore, potential impacts at the program level would be reduced to below a level of significance.

b. Specific Management Directives for Otay Mesa

The CPU would be consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact and the CPU incorporates policies for adhering to the

Management Directives. No significant impacts relating to MSCP consistency would occur.

5.4.7.3 Mitigation Framework

a. MHPA

Boundary Adjustments

Impacts would not be considered significant; therefore, no mitigation is required.

MHPA Land Use Adjacency Guidelines

MHPA adjacency impacts would be addressed at the project-level. Please refer to Mitigation Framework **LU-2 in** Section 5.1.6 (Land Use).

b. Specific Management Directives for Otay Mesa

No impacts would result; therefore, no mitigation would be required.

5.4.7.4 Significance after Mitigation

a. MHPA

Boundary Adjustments

Impacts would be below a level of significance.

MHPA Land Use Adjacency Guidelines

Implementation of Mitigation Framework **LU-2** would reduce impacts at the program level to below a level of significance.

b. Specific Management Directives for Otay Mesa

Impacts would be less than significant.

5.4.8 Issue 5: Invasive Plants

Would the CPU result in the introduction of invasive species of plants into the area?

5.4.8.1 Impacts

The CPU would adhere to MSCP Subarea Plan and City regulations, both of which contain policies for control of invasive plant species. Invasive species are aggressive non-native plant species that threaten natural habitats by outcompeting native species

and reducing biodiversity. These plants thrive in areas disturbed by activities such as grading, construction, off-road vehicle use, and fire.

In areas outside of the MHPA, invasive plant species would have the potential to be introduced due to future development activities. However, all subsequent projects developed in accordance with the CPU would be subject to CEQA review and compliance with the City's Biology Guidelines, MSCP Subarea Plan, and the Landscape Standards in the Land Development Manual, including the prohibitions on the use of invasive plant species, such as paper mulberry (*Broussonetia papyrifera*) or pampas grass (*Cortaderia selloana*).

Due to the large extent of future grading and development within the CPU, the CPU has the potential to introduce invasive species into the MHPA. If uncontrolled, invasive species could significantly impact the integrity of the MHPA in the CPU area. The MHPA Land Use Adjacency Guidelines require that no invasive, non-native plant species be introduced into areas adjacent to the MHPA. Future development implemented in accordance with the CPU would require subsequent review and compliance with all City regulations and guidelines, including the MHPA Land Use Adjacency Guidelines.

As discussed in Section 5.1, Land Use and above in Section 5.4.7.4, impacts associated with the MHPA Land Use Adjacency Guidelines would be considered significant, as implementation of the CPU would introduce new development adjacent to MHPA.

5.4.8.2 Significance of Impacts

Potential impacts associated with the introduction of invasive species into the MHPA would be evaluated at the project-level. All future projects would be required to implement the MHPA Land Use Adjacency Guidelines and Mitigation Framework measure LU-2 in Section 5.1.6, Land Use, which requires that the project's landscape plan would not contain any exotic plant/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA.

5.4.8.3 Mitigation Framework

The introduction of invasive species into the MHPA would be addressed at the project-level. Please refer to Mitigation Framework LU-2 in Section 5.1.6, Land Use.

5.4.8.4 Significance after Mitigation

At the program-level, implementation of the MHPA Land Use Adjacency Guidelines and Mitigation Framework measure **LU-2** would reduce impacts to below a level of significance.

5.4.9 Issue 6: Wetland Impacts

Would the CPU result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filling, hydrological interruption, or other means?

5.4.9.1 Impacts

The CPU incorporates several policies related to the protection of sensitive habitats such as wetlands and vernal pools:

Policy CE 8.1-7 requires the preservation, restoration, management, and monitoring within identified vernal pool preservation areas in accordance with City, state, and federal policies and regulations. The boundaries of vernal pool preserve areas should be of sufficient size and shape to protect the vernal pool basins, watersheds, functional buffers, and areas necessary to maintain vernal pool ecosystem function and species viability. Policy CE 8.1.10 requires development to obtain all required state and federal permits.

Wetlands habitats in the CPU area consist primarily of vernal pools, basins with fairy shrimp, freshwater marsh, mule fat scrub, alkali seep, and riparian habitat. Figure 5.4-6 shows the potential impacts to these categories of wetlands with implementation of the CPU.

The City's Biology Guidelines, ESL Regulations, and MSCP Subarea Plan requires that impacts to wetlands, which include vernal pools and vernal pool species, shall be avoided and that a sufficient buffer shall be maintained around all wetlands to protect wetland functions and values. In the case of vernal pools, avoidance includes maintaining a sufficient amount of the pool's watershed area necessary for its continued viability and providing a buffer around the vernal pool to protect wetland functions and values. Buffer distances are typically 100 feet, but in some cases, a lesser buffer may be approved provided it can be demonstrated that the functions and values of the wetland are not compromised.

Future projects implemented in accordance with CPU may result in impacts to wetlands and thus require a deviation from the ESL Regulations. Wetland impacts may be considered under the following three options: the Essential Public Projects, Economic Viability Option, or Biologically Superior Option. Under the wetland deviation process for the Essential Public Projects and Economic Viability Options impacts must be avoided, but if not feasible, then impacts must be minimized to the maximum extent practicable. Under the wetland deviation process for the Biologically Superior Option, only wetland resources of low biological quality may be impacted and must result in a biologically superior outcome. The assessment of low biological quality would be specific to the resource type impacted (e.g., vernal pools, riparian, and unvegetated channels), and

would include consideration of the following factors: use of the wetland by federal and/or state endangered, threatened, sensitive, rare and/or other indigenous species, diversity of native flora and fauna enhancement or restoration potential, habitat function/ecological role, connectivity to other wetland or upland systems, hydrologic functions, status of watershed, and source and quality of water. In addition, impacts to vernal pools would require special assessments, as noted below.

a. Vernal Pools and Vernal Pool Species

Vernal pools and basins with fairy shrimp occur throughout the CPU area. As mentioned previously, basins with fairy shrimp may be vernal pools or may simply be road ruts in which fairy shrimp happen to occur. Project-specific analysis would be required for future projects and would determine what agencies (City, USFWS, RWQCB, USACE, or CDFW) have regulatory authority over basins with fairy shrimp.

Implementation of the CPU has potential to impact up to 2.95 acres of vernal pools and 0.7 acre of basins with fairy shrimp. It is recognized that as future development projects come forward, the impacts could be lessened or avoided depending on site-specific project designs.

Impacts to vernal pools would require a deviation from the City's ESL Regulations. The vernal pools which could be impacted would require the following assessments: presence of vernal pool flora and fauna, information on hydrology, determination of habitat function, and restoration potential. In addition, protocol fairy shrimp surveys would be required for all vernal pools to determine the presence or absence of these species. Impacts to fairy shrimp would require a Section 10(a)1(A) permit from the USFWS.

b. Other Jurisdictional Wetlands

Implementation of the CPU has potential to result in impacts to both wetland and non-wetland streambed waters regulated by the USACE, CDFW, and City of San Diego. In addition, the USFWS would be involved under Section 7 of the FESA during consultation initiated by the USACE during the 404 permit process if federal listed species are present. There is also the potential for additional unmapped non-wetland waters of the U.S. and streambeds to occur within the CPU area. Future development has the potential to result in disturbances to habitat and drainages that are under the jurisdiction of the USACE according to Section 404 of the Clean Water Act, RWQCB in accordance with Section 401 of the Clean Water Act, and CDFW under Section 1600 of the Fish and Game Code. In addition, impacts to wetlands would require a deviation from the City's ESL Regulations. Wetland and jurisdictional impacts would be determined at the project-level and would require subsequent environmental review.

In addition, a preliminary or final jurisdictional wetlands delineation of the future project site shall be completed following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region* (2008). A determination of the presence/absence and boundaries of any Waters of the U.S. (WoUS) and Waters of the State (WoS) shall also be completed following the appropriate USACE guidance documents for determining the Ordinary High Water Mark (OHWM) boundaries. The limits of any riparian habitats on the site under the sole jurisdiction of CDFG shall also be delineated, as well as any special aquatic sites (e.g., vernal pools) that may not be within the USACE jurisdiction under the CWA or meet other federal jurisdictional criteria but are regulated by the FESA, CESA, CCC, and/or RWQCB. The City does not have take authority for vernal pools containing sensitive species. A USFWS permit would be required if vernal pools were present with sensitive species.

Projects with any impacts to wetlands must clearly demonstrate that: (1) there is no least environmentally damaging alternative that would reduce/avoid the impact; (2) impacts are minimized to the maximum extent possible; and (3) impacts are fully mitigated in accordance with the City of San Diego's Biology Guidelines.

5.4.9.2 Significance of Impacts

Impacts to wetlands, vernal pools, and other jurisdictional water resources would be significant.

5.4.9.3 Mitigation Framework

Future projects implemented in accordance with the CPU which cannot demonstrate compliance with CPIOZ A because impacts to wetlands/jurisdictional resources cannot be avoided shall be required to implement the following Mitigation Framework:

BIO-4: To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the CPU shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats.

Prior to obtaining discretionary permits for future actions implemented in accordance with the CPU, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any

required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012a). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*. A determination of the presence/absence and boundaries of any WoUS and WoS shall also be completed following the appropriate USACE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by California Coastal Commission and the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options; Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetland be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.4-8a and b below. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.

- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved. The Biologically Superior Option mitigation shall include either (1) standard mitigation per Table 5.4-8a, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential

long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 5.4-b is required.

TABLE 5.4-8a
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(With Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	2:1 to 3:1
Vernal pool*	2:1 to 4:1
Basin with fairy shrimp*	2:1 to 4:1
Freshwater marsh	2:1

*The City does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

TABLE 5.4-8b
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(Without Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	4:1 to 6:1
Vernal pool*	4:1 to 8:1
Basin with fairy shrimp*	4:1 to 8:1
Freshwater marsh	4:1

*The City does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.

- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of

agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.

- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director (ADD)/Environmental Designee prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;
- Compliance with the RWQCB Section 401 Water Quality Certification; and
- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

***Vernal Pools and Vernal Pool Species*:** Impacts to vernal pools shall require assessments of vernal pool flora and fauna, hydrology, habitat function, and restoration potential and protocol fairy shrimp surveys, in addition to the requirements listed above. Impacts to fairy shrimp shall require either a section 10(a)1(A) permit or Section 7 consultation Biological Opinion from USFWS. If the vernal pool HCP is adopted, the City will receive take authorization for the seven vernal pool species.

Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series) and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

5.4.9.4 Significance after Mitigation

Compliance with CPU policies and established development standards, ESL Regulations as well as the MSCP Subarea Plan, the City's Biology Guidelines, and implementation of the Mitigation Framework detailed in BIO-4 would serve to reduce impacts to wetlands, vernal pools, and other jurisdictional water resources at the program level to below a level of significance.

~~Compliance with CPU policies and established development standards and regulations would serve to reduce impacts to wetlands, jurisdictional resources, vernal pools and vernal pool species to a degree, but cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Because the extent of future development is unknown at this time, the degree of impact and applicability, feasibility, and success of these measures cannot be accurately predicted for each specific project at this time. Therefore, direct and/or indirect impacts to wetlands, jurisdictional resources vernal pools and vernal pool species are considered significant and unavoidable at the program-level.~~

5.4.10 Issue 7: Noise Generation

Would the temporary construction noise from the CPU or permanent noise generators (including roads) adversely impact sensitive species (e.g., coastal California gnatcatcher) within the MHPA?

5.4.10.1 Impacts

The CPU incorporates several policies related to the reduction of temporary and permanent noise generators. Even with the implementation of these policies, the increase in intensity of development would result in increased noise, as discussed in Section 5.10 of this PEIR. Increased noise from future construction, roadways or transit adjacent to MHPA would result in a temporary increase in ambient noise. While construction noise would be short-term, the introduction of certain types of land uses that would generate noise, such as commercial or recreation, would be long-term.

The following CPU Circulation Element roads are planned within, adjacent to or would cross the MHPA: Beyer Boulevard, Airway Road, Dennery Road, Heritage/Otay Valley Road, Aviator Road, and La Media Road. Land uses and roadway alignments adjacent to the MHPA have the potential for temporary and/or permanent noise impacts in these areas.

Increased noise levels have the potential to disrupt wildlife, especially during the breeding season, and would potentially affect the population of sensitive species such as the coastal California gnatcatcher. Adverse responses due to increased noise would include hearing loss, temporary masking of vocalizations commonly used during breeding season, nest abandonment, and/or decrease in predator awareness, resulting in a decrease in reproductive and overall fitness of noise-sensitive species. With the exception of federally or state listed species, impacts to sensitive species outside of the MHPA are not restricted but would require mitigation in accordance with the City's Biology Guidelines.

Implementation of the CPU has the potential to impact sensitive wildlife species indirectly by placing development adjacent to MHPA.

5.4.10.2 Significance of Impacts

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.

5.4.10.3 Mitigation Framework

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU are included in Sections 5.1.6.3 (Land Use) and 5.4.4.3 (Biological Resources) Please refer to Mitigation Framework BIO-1 through BIO-4 and LU-2 (MHPA Land Use Adjacency Guidelines).

5.4.10.4 Significance after Mitigation

At the program-level, compliance with the GP and CPU policies, the ESL Regulations, MHPA Land Use Adjacency Guidelines, the City's Biology Guidelines, and the above Mitigation Framework measures would serve to reduce indirect noise impacts to sensitive wildlife species to below a level of significance.

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5.5 Historical Resources

This section addresses historical and archaeological resources and is based on the Cultural Resources Technical Report for the CPU, prepared by RECON in 2012 (Appendix E). It should be noted however, that the conclusions found in the Cultural Resources Technical Report for the CPU differ from those contained in this EIR section. The conclusion of "Significant and Mitigated" was determined after a comprehensive review of the CPU and associated policies, goals and zoning actions which will guide future development in the CPU area. Historical resources includes all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places (NRHP), as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources or the City of San Diego Historical Resources Register. Historical resources are site improvements, buildings, structures, historic district signs, features (including significant trees or other landscaping), places, place names, interior elements and fixture designated in conjunction with a property, or other objects of historical archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City and the region. They include building structures, objects, archaeological sites, districts or landscapes possessing physical evidence of human activities that are typically over 45 years old, regardless of whether they have been altered or continue to be used. Also included are distinguishing architectural characteristics and TCPs. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods.

5.5.1 Existing Conditions

5.5.1.1 Historic Background

San Diego County has a long cultural history. A detailed chronology of the prehistoric and historic settlement is contained in Appendix E.

a. Ethnographic Background

Prior to European settlement, a variety of usable resources were on Otay Mesa. The coastal sage scrub, chamise chaparral, and maritime succulent scrub communities contain many plants used by the Kumeyaay population. These plants were used for food, medicine, ceremonies, and as a source of wood. Animals included jackrabbit, bush rabbit, cottontail rabbit, ground squirrel, woodrats, other small rodents, deer, and various small birds and reptiles. Another resource was Santiago Peak Volcanics, a raw material for flaked stone tool production, which was easily obtainable.

Otay Mesa is in the traditional territory of the Kumeyaay (also known as Kamia, Ipai, Tipai, and Diegueño). At the time of the Spanish invasion, the Kumeyaay occupied the southern two-thirds of San Diego County. The Kumeyaay belong to the Hokan language family, which includes the lower Colorado River tribes (e.g., Quechan [Yuma], Mojave, Halchidhoma, Cocopa) and Arizona groups (e.g., Maricopa, Havasupai, Paipai) to whom they are closely related.

Traditional Kumeyaay territory extended over the southern two-thirds of San Diego County, from Agua Hedionda (south of Carlsbad) south to some 20 miles below Ensenada, in northern Baja California, Mexico. On the west, their territory started at the Pacific Ocean and extended to the mountains of the Peninsular Range and into the desert just beyond. Kumeyaay territory included a number of ecological zones including rocky shore and sandy ocean beaches on the coast. As one moved east from the shore, there were grasslands, marshes, the coastal chaparral-covered Otay Mesa, oak groves, riparian woodlands, cypress woodland on Otay Mountain, and pine and cedar forest in the Laguna and Cuyamaca Mountains.

Subsistence for mountain and valley people focused on gathering plant foods. Acorns are thought to have been the most important dietary staple for the Kumeyaay. Agave (mescal) was an important food found along the arid eastern slopes of the Peninsular Range. Hunting contributed to the diet in a minor way. It was focused on small game, primarily rabbits and rodents. These were taken with bow and arrow, throwing stick (macana), or nets. Hunting of large game was somewhat less important, with deer and bighorn sheep taken on occasion. Large game provided leather and sinew for clothing and crafts.

The most basic social and economic unit was the patrilocal extended family. Within the family, there was a basic division of labor based upon gender and age, but it was not rigid. Women made pottery and basketry, gathered plant resources, ground seeds and acorns, prepared meals, and so on. Men hunted, fished, helped collect and carry acorns and other heavy tasks, and made tools for the hunt. Old women were active in teaching and caring for children while younger women were busy with other tasks. Older men were involved in politics, ceremonial life, teaching young men, and making nets, stone tools, and ceremonial paraphernalia.

Settlement systems typically consisted of two or more seasonal villages with temporary camps radiating away from these central places. For example, the Kwaaymii Band, which spent summers at Mount Laguna, migrated downslope to Vallecitos to spend the winter in the desert.

b. Prehistoric Background

As described in the Cultural Resources Technical Report, the prehistory of Otay Mesa can generally be divided into three major periods: Paleoindian (also referred to as PaleoAmerican), Archaic, and Late Prehistoric. An additional pre-Paleoindian period

(Malpais Period) is also recognized by some researchers. The dates associated with these periods range from pre-12,000 B.P. to 1769 with some considerable regional variation. These four periods are discussed in detail below.

Malpais Period (prior to 12,000 B.P.)

A number of researchers posit a period that predates the PaleoAmerican period. This pre-PaleoAmerican period is now often called the Malpais period, a term that was adapted from the early work of Malcolm Rogers in 1939, who used it to refer to what is now the first portion of the San Dieguito and Lake Mojave complex. This complex is characterized by heavily patinated choppers, scrapers, and other crude, core-based tools typically found deeply embedded in desert pavements. Many researchers are skeptical of the existence of this period and obtaining reliable dates has been elusive.

PaleoAmerican Period (12,000 to 7,000 B.P.)

The earliest well-documented sites in the San Diego area belong to the San Dieguito complex, which are thought to be from the PaleoAmerican period. Related materials have been found in the Mojave Desert and in the Great Basin, referred to as the Lake Mojave Complex. The San Dieguito and Lake Mojave Complex are thought by most researchers to have an emphasis on big game hunting. The assemblage is dominated by finely made scraping and chopping tools of felsite or fine-grained basalt. Large-stemmed Lake Mojave and Silver Lake types. Leaf-shaped projectile points are relatively abundant while seed grinding technology was limited or absent (Warren 1984).

Archaic Period (7,000 to 1,500 B.P.)

This period brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic Period are called the La Jollan Complex along the coast, and the Pauma Complex inland (True 1980). Pauma Complex sites lack the shell that dominates many La Jollan sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. There appears to have been a shift away from the northern San Diego coast in the middle of the period. This is most likely a response to the depletion of coastal resources and the siltation of lagoons. The La Jollan assemblage is dominated by rough, cobble-based choppers and scrapers, and slab and basin metates. Bedrock milling is absent and projectile points are rare, although Elko series points are occasionally noted (Justice 2002).

Late Prehistoric Period (1,500 B.P. to 1769)

The Late Prehistoric period of the southern San Diego coast and foothills is characterized by the Cuyamaca Complex.

The Cuyamaca complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants (some of these steatite items are incised with crosshatching), and steatite comales (heating stones, some of which are biconically drilled on one end). Ceramics appear for the first time during this period in the form of Tizon Brownware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, and miniature pottery vessels. Stone artifacts include various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, and mortars and pestles. Projectile points consist of Desert Side-Notched and less commonly Cottonwood Series projectile points (True 1966, 1970). These small points indicate the advent of the bow and arrow.

c. Aviation and Military History of Otay Mesa

Along with its agricultural history, aviation was important in Otay Mesa's history and can be traced back to the 1880s. In 1883, 20 years before the Wright brothers' famous flight in North Carolina, John Joseph Montgomery made the world's first controlled flight with a fixed curved-wing glider from the top of a hill on Otay Mesa. In 1918, the Army Air Corps established East Field along Otay Mesa Road. During the 1920s, the Navy began to have a presence at East Field as the airstrip provided a practice landing field for pilots in training. In 1935, East Field was transferred to the Navy and was used for training prior to and during World War II. East Field was renamed Brown Field in 1943 in memory of Commander Melville Stuart Brown, killed in a plane crash near Descanso, California. After World War II, the Navy leased Brown Field to San Diego County, but reopened the facility with the outbreak of the Korean War in 1951. The City of San Diego annexed Otay Mesa in 1956 and acquired Brown Field in 1962 in order to relieve congestion at Lindbergh Field. The conversion of Brown Field to a general aviation airport brought new businesses, industries, and agencies to Otay Mesa. The Border Patrol moved its light planes to Brown Field and the U.S. Customs Service changed the port of entry for San Diego from Lindbergh Field to Brown Field.

5.5.1.2 Otay Mesa Historical Resource Investigations

a. Overview

Otay Mesa has been the subject of numerous cultural resource evaluations from surveys through data recovery programs over the last 20 years. The entire CPU area was surveyed as part of a larger area by the County of San Diego in 1983. Additional surveys have been conducted since that time.

An Otay Mesa management plan for prehistoric resources was developed by Gallegos & Associates as an outgrowth of negotiations between Caltrans and the Office of Historic Preservation to provide consistent site definitions and a management strategy for the kinds of resources present on Otay Mesa. This plan begins with a discussion of recorded site types using information drawn from site record forms. Habitation sites, temporary camps,

lithic scatters, quarry, shell middens, and non-sites are resource types defined for the baseline study area. After the initial discussion of recorded site types on the mesa, Gallegos et al. (1998) determined that three site types dominate Otay Mesa: habitation sites, artifact scatters/temporary camps, and lithic scatters. Site types are defined in Table 5.5-1.

TABLE 5.5-1
SITE TYPOLOGY OF OTAY MESA PREHISTORIC RESOURCES

Type	Description
Habitation	A habitation site contains a variety of artifacts that may include flaked lithics, ground stone, ceramics, and faunal material, and possibly bedrock milling in a late prehistoric site. The presence of some or all of these artifacts, and possibly features, suggests that more than one activity occurred at the site. Habitation sites contain a midden deposit indicating either repeated seasonal or semi-permanent occupation. This site type is sometimes referred to as a village site.
Temporary Camp	A temporary camp site is similar to a habitation site in that it has a variety of artifact types indicating more than one activity occurred at the site. However, it is different from a habitation site since it has little or no midden, a less complex assemblage, and fewer artifacts overall. These attributes indicate that the site was occupied for a short period of time.
Artifact scatters	Artifact scatters are defined as a surface scatter of two or more artifact types, such as flaked lithic, tools, ground stone, and ceramics, with no subsurface deposit. Faunal material such as bone and shell can also occur on this type of site. An artifact scatter may represent a stopping place on a journey, an area where a task was completed, or a special purpose site.
Lithic Scatter	A scatter of debitage, cores, bifaces, and other flake- and core-based tools that is temporally non-diagnostic.
Lithic Reduction Concentration	Generally, a lithic reduction concentration is a dense concentration of debitage and cores within a localized area.
Bedrock Milling	These are features located on large boulders or bedrock outcrops that contain one or more milling features, such as mortars, basin metates, or milling slicks. Bedrock milling sites are specific task sites. In some cases surface and/or subsurface deposit of artifacts may be present around the bedrock. Bedrock milling features can occur as part of habitation or temporary camp sites.
Shell Concentration/ Shell Midden	A shell concentration may or may not have a subsurface deposit. If testing identifies a subsurface deposit and ground stone implements are present, then the site may be a temporary camp or habitation site, depending on the complexity of the assemblage. A shell midden site without a complex assemblage or extensive milling equipment represents a place where intensive processing of shellfish resources was the main activity.
Quarry	This is a place where the principal activity consisted of procuring raw lithic material for tools. Quarry sites may be extensive and involve actual mining of lithic outcrops for tool stone material.
Isolates	Isolated tools and tool clusters that do not meet the threshold for another site type.

b. Records Search Results

Archaeological Resources

The CPU area has been surveyed for cultural resources and many portions have been examined multiple times. According to a records search review at the South Coast

Information Center (SCIC) for the CPU area conducted as part of the Cultural Resources Technical Report, there are 262 historic and prehistoric sites/structures recorded within the CPU area boundaries. Of the 262 recorded sites, 136 have been partially or completely developed. Of these 136 sites, 83 have been completely destroyed and 53 have been impacted to some extent. A total of 126 known sites that remain within the CPU area have not been impacted by development. Table 5.5-2 lists all of the recorded sites within the CPU area.

In addition, there are 56 isolates filed at the SCIC. These isolates consist of one or two prehistoric artifacts and are not considered significant historical resources under City of San Diego or CEQA criteria, and therefore are not included in the discussion of potential impacts.

Historic Buildings, Structures, and Objects

Seven of the recorded structures/sites within the CPU have been designated as Historical Landmarks by the San Diego Historical Resources Board (HRB). Five of these are the buildings that comprise P37-018246, the proposed Auxiliary Naval Air Station Brown Field Historic District (the tower and four nose-end hangars). This site is also listed on the NRHP. The sixth structure (P37-018256) is the Auxiliary Naval Air Station Brown Field latrine (Facility 2044). The last site is the Alta School site (CA-SDI-10628). Although this site is within the Auxiliary Naval Air Station Brown Field boundary, it predates the Navy facility. CA-SDI-10628 was tested in 1996 by Gallegos & Associates and was found to contain both historic and prehistoric components.

c. Designated Historical Resources

Designated resources include the Auxiliary Naval Air Station Brown Field Historic District (HRB Site #405-408), Building Facility 2004 at Brown Field (HRB site #409), Building Facility 2044 (HRB Site #410), and the Alta School Site (HRB Site #411). These historical resources are designated locally for various reasons such as their distinctive architecture, association with the war effort, archaeological significance, and eligibility for listing on the National Register.

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA

Site #	Site Type	Status	Significance
P-13-013724	Historic		
P-13-014296	Isolate		Not significant
P-13-014297	Isolate		Not significant
P-13-014298	Isolate		Not significant
P-13-014299	Isolate		Not significant
P-13-014300	Isolate		Not significant
P-13-014301	Isolate		Not significant
P-13-014303	Isolate		Not significant
P-13-014802	Isolate		Not significant
P-13-015977	Isolate		Not significant
P-13-015978	Isolate		Not significant
P-13-015979	Isolate		Not significant
P-13-015980	Historic	Location based on 1903 USGS for homestead in junkyard now	Undetermined
P-13-015981	Historic	Location based on 1903 USGS possible Piper farmstead & 1928	Undetermined
P-13-015982	Historic	Location based on 1903/1928 aerial	
P-13-015983	Historic	Location based on 1903 USGS possible Lampe farmstead	Undetermined
P-13-015987	Historic	Location of homestead based on 1903 and 1928 USGS, survey found heavy disturbance	Undetermined
P-13-015988	Historic	Location of church and cemetery, church demolished, possible unmoved graves.	Undetermined
P-13-016189	Isolate		Not significant
P-13-016190	Isolate		Not significant
P-13-016524	Isolate		Not significant
P-13-016525	Isolate		Not significant
P-13-016526	Isolate		Not significant
P-13-018246	Historic	Aux. NAS Brown Field hist. dist. 5 buildings.	NRHP 35,eligible
P-13-018247	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018250	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018251	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018252	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018253	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018254	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018255	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018256	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018257	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018258	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
P-13-018259	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018260	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-018261	Historic	Other WW II era buildings not eligible for inclusion	NRHP 6z
P-13-025298	Isolate		Not significant
CA-SDI-10055	Lithic Scatter	In Dennery Ranch Open space	Unknown
CA-SDI-10056	Lithic Scatter	Tested 1990- mitigated, area developed	Previously Mitigated
CA-SDI-10057	Lithic Scatter	Not relocated 1999	Unknown
CA-SDI-10058a	Village/Base Camp	Tested 1990 developed	Unknown
CA-SDI-10058b	Village/Base Camp	Tested 1990 developed	Unknown
CA-SDI-10058c	Village/Base Camp	Tested 1990 developed	Unknown
CA-SDI-10059	Lithic Scatter	On aerial appears developed	Unknown
CA-SDI-10060	Lithic Scatter/Historic Features	Tested/Mitigated 1992	Unknown
CA-SDI-10072	No description	Combined w/other sites new#CA-SDI-12337	
CA-SDI-10185	Habitation	Mitigated 1987,1988 developed	Previously Mitigated
CA-SDI-10186	Sparse Lithic Scatter	Mitigated 1987,1989 part in MSCP preserve	Not significant
CA-SDI-10187	Temporary Camp	Tested mitigated 1997	Not significant
CA-SDI-10188	Temporary Camp	Tested 1990-Junkyard & road widening heavily impacted	Not significant
CA-SDI-10189	Temporary Camp/Special processes	Tested 1987 -area developed, mitigated	Previously Mitigated
CA-SDI-10190	Temporary Camp/Special processes	Tested 1987 -area developed, mitigated	Previously Mitigated
CA-SDI-10191	Sparse Lithic Scatter/Plant Processing	Tested 1987 -area developed, mitigated/northern end may still exist	Not significant
CA-SDI-10192	Sparse Lithic Scatter/Processing	Tested 1987-mitigated ,developed	Not significant
CA-SDI-10193	Sparse Lithic Scatter/Processing	Tested 1987 most now in mitigation, biological preserves	Not significant
CA-SDI-10194	Sparse Lithic Scatter/Processing	Tested 1987 mitigated, developed	Not significant
CA-SDI-10195	Sparse Lithic Scatter/Processing	Tested 1987 mitigated, developed	Not significant
CA-SDI-10196	Temp. Camp	Part may be in Dennery Ranch, upper preserve area heavily disturbed	Unknown
CA-SDI-10197	Temp. Camp	Tested 1987 mitigated, developed	Not significant
CA-SDI-10198	Base Camp	Tested 1987, mitigated, most now in Dennery up preserve	Not significant
CA-SDI-10199	Sparse Lithic Scatter	Area not developed, no work recorded	Undetermined

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-10200	Lithic Scatter/Processing	Tested 1987,mitigated,developed	Not significant
CA-SDI-10201	Temp. Camp	Not tested, area currently in MHPA open space in Dennery Canyon	Unknown
CA-SDI-10202	Sparse Lithic Scatter/Processing	Tested 1987,mitigated,part developed, part in revegetation area	Not significant
CA-SDI-10203	Processing Site	Tested 1987 mitigated area developed	Not significant
CA-SDI-10204	Artifact Scatter/no form	Tested in 1987, mitigated, currently in open space	Not Significant
CA-SDI-10205	Sparse Lithic Scatter/Processing	Tested 1987 mitigated in MHPA, open space	Previously Mitigated
CA-SDI-10206	Lithic Scatter(Gallegos)	Currently undeveloped, may be impacted by Beyer Blvd. Extension	Unknown
CA-SDI-10207	Lithic Scatter(Gallegos)	Currently undeveloped, may be impacted by Beyer Blvd. Extension	Unknown
CA-SDI-10208	Quarry/ Workshop	Tested 1987 mitigated, in undeveloped area	Not significant
CA-SDI-10209	Sparse Lithic Scatter	Not relocated 1999,area tested nothing found, 50&60s builders, no work remains	Not significant
CA-SDI-10210	Temp Camp	Tested 1990/1999 mitigated in MHPA open space	Not significant
CA-SDI-10245	Lithic Scatter	Tested mitigated for SR-905	Previously Mitigated
CA-SDI-10281		Does not exist	
CA-SDI-10285	Lithic Scatter	Work unknown in MHPA, open space	Unknown
CA-SDI-10286	Sparse Lithic Scatter/Processing	Labeled as 10281, Tested 1987 mitigated	Undetermined
CA-SDI-10511	Lithic Scatter	Tested 1994 mitigated, developed	Not significant
CA-SDI-10512	Lithic Scatter	Not on record search map, undeveloped area, on known testing	Undetermined
CA-SDI-10513	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10514	Lithic Scatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-10515	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10516	Sparse Lithic Scatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-10517	Sparse Lithic Scatter	Currently undeveloped area no known testing	Undetermined
CA-SDI-10518	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10519	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10520	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10521	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10522	Sparse Lithic Scatter	Tested in 1990 by ASM Affiliates, mitigated	Previously Mitigated

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-10523	Sparse Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10524	Sparse Lithic Scatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-10525	Sparse lithic scatter	Tested 1994, mitigated, site developed	Previously Mitigated
CA-SDI-10526	Sparse Lithic Scatter	Tested 1994 mitigated	Not significant
CA-SDI-10527	Sparse lithic scatter	Appears to be in developed area, tested 1994, mitigated	Not significant
CA-SDI-10608	Lithic Scatter	Tested 1995 area not yet mitigated, developed	Not significant
CA-SDI-10616a	Sparse Lithic Scatter	Tested 1986 part of site area developed, mitigated	Not significant
CA-SDI-10616b	Sparse Lithic Scatter	Tested 1986 part of site area developed, mitigated	Not significant
CA-SDI-10617	Sparse Lithic Scatter	Tested 1986 mitigated, area not developed	Not significant
CA-SDI-10618	Lithic Scatter	Tested 1986, area developed. mitigated	Not significant
CA-SDI-10619	Habitation Area	Data recovery 1987 part of site now destroyed	Significant
CA-SDI-10620a	Habitation Area	Tested 1986 in open space	Significant
CA-SDI-10620b	Quarry	Tested 1986 in open space	Significant
CA-SDI-10621a	Workshop/Habitation	Data recovery 1987 mitigated, area developed	Significant
CA-SDI-10621b	Sparse Lithic Scatter	Collected 1987 mitigated	Not significant
CA-SDI-10621d	Sparse Lithic Scatter	Collected 1987 mitigated	Not significant
CA-SDI-10621e	Sparse Lithic Scatter	Collected 1987 mitigated	Not significant
CA-SDI-10621f	Sparse Lithic Scatter	Collected 1987 mitigated	Not significant
CA-SDI-10621g	Sparse Lithic Scatter	Collected 1987 mitigated	Not significant
CA-SDI-10622	Lithic Scatter	Currently undeveloped area, no known testing	Undetermined
CA-SDI-10623	Temporary Camp	Southern half developed, north undeveloped, no testing recorded	Undetermined
CA-SDI-10628	Historic site of Alta School	CA-SDI-10608 combined w/ this site, tested 1995, not developed	Undetermined
CA-SDI-10649	Lithic Scatter	No record of testing currently in MHPA open space	Not determined
CA-SDI-10650	Lithic Scatter	No record of testing currently in MHPA open space	
CA-SDI-10734	Sparse Lithic Scatter	Tested mitigated for SR-905	Not significant
CA-SDI-10735A	Lithic Scatter/Processing	No record of testing, currently undeveloped	Undetermined
CA-SDI-10735B	Lithic Scatter/Processing	No record of testing, currently undeveloped	Undetermined
CA-SDI-10735C	Lithic Scatter/Processing	No record of testing, currently undeveloped	Undetermined
CA-SDI-10738	Lithic Scatter	No record of testing, destroyed by housing	Unknown
CA-SDI-10739	Temp Camp	No record of test or mitigation., but area is developed	Unknown
CA-SDI-10748	Lithic Scatter	Tested 1987, east part of site developed	Not significant

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-10800	Habitation Site	Tested in past, data recovery, mitigation necessary	Significant
CA-SDI-10801	Habitation Site	Tested in 1987, data recovery, mitigation necessary	Significant
CA-SDI-10802	Lithic Scatter	Tested 1987, data recovery, currently not developed	Not significant
CA-SDI-10803	Lithic Scatter	Tested 1987, data recovery, currently not developed	Not significant
CA-SDI-10804	Habitation Site	Tested 1987, needs data recovery, mitigation	Significant
CA-SDI-10805	Sparse Lithic Scatter	Tested 1987, mitigated, currently not developed	Not significant
CA-SDI-10806	Lithic Scatter	Tested 1987, mitigated, currently not developed	Not significant
CA-SDI-10807	Sparse Lithic Scatter	Tested 1987, mitigated, currently not developed	Not significant
CA-SDI-10808	Habitation Site	Tested 1987, needs data recovery, currently not dev.	Significant
CA-SDI-10809	Habitation Site	Tested 1987, needs data recovery, currently not dev.	Significant
CA-SDI-10810	Lithic Scatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-10811	Habitation Site	Tested 1987, data recovery, mitigation, not currently dev.	Significant
CA-SDI-10963	Sparse Lithic Scatter	Testing 1988 no determination, northern part developed	Undetermined
CA-SDI-11049	Two metates	Nothing known	Not significant
CA-SDI-11065	Lithic Scatter	Tested 1986 mitigated not currently developed	Not significant
CA-SDI-11079	Habitation	Gallegos says needs mitigation, tested 1994 no indication of mitigation but developed	Significant
CA-SDI-11210	Lithic Scatter	Tested 1989 mitigated not developed	Not significant
CA-SDI-11211	Lithic Scatter	Tested 1989 mitigated not developed	Not significant
CA-SDI-11212	Lithic Scatter	Tested 1989,1992,1999,mitigated, not developed	Not significant
CA-SDI-11213	Lithic Scatter	Tested 1989,1992,1999,mitigated, not developed	Not significant
CA-SDI-11214	Lithic Scatter	Tested 1989,1992, mitigated, not developed	Not significant
CA-SDI-11215	Lithic Scatter	Tested 1989,1992, mitigated, not developed	Not significant
CA-SDI-11216	Lithic Scatter	Tested 1989,1992, mitigated, not developed	Not significant
CA-SDI-11217	Lithic Scatter/Historic Features	Tested 1989,1992, not mitigated, not developed	Undetermined
CA-SDI-11218	Lithic Scatter/ Historic Features	Tested 1989,1992, not mitigated, not developed	Undetermined

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-11219	Lithic Scatter/ Historic Features	Tested 1989,1992, not mitigated	Undetermined
CA-SDI-11220	Lithic Scatter	Tested 1989,1992,2002, mitigated	Not significant
CA-SDI-11221	Historic	Tested 1989 by Smith	Undetermined
CA-SDI-11363	Lithic Scatter	Tested 1989,1992,2002, mitigated	Not significant
CA-SDI-11367/11368	Sparse lithic scatter	Tested	Not significant
CA-SDI-11423	Lithic Scatter	Tested 1997 mitigated most of destroyed	Not significant
CA-SDI-11424	Habitation	Tested 1997 data some recovery, mitigation necessary, developed	Significant
CA-SDI-11671	Lithic Scatter	Tested 1991 not known if mitigated, not developed	Undetermined
CA-SDI-11672	Sparse Lithic Scatter	No testing recorded, not developed	Undetermined
CA-SDI-11673	Lithic Scatter	Tested 1991 not known if mitigated, not developed	Undetermined
CA-SDI-11680	Lithic Scatter	No testing or other work recorded, not developed	Undetermined
CA-SDI-11821/H	Piper Ranch Complex	Tested in 1995 by Gallegos and Assoc., area now developed	Previously Mitigated
CA-SDI-11822	Artifact Scatter	Tested 1990 not known if mitigated	Undetermined
CA-SDI-11944	Lithic Scatter	Tested 1990 mitigated in open space	Not significant
CA-SDI-11951	Lithic Scatter	Tested 1990,1992,1999 mitigated	Not significant
CA-SDI-11969	Quarry	Tested 1990 mitigated in open space	Not significant
CA-SDI-12229H	Artifact Scatter/ Historic	No testing recorded in undeveloped area	
CA-SDI-12257	Lithic Scatter	No testing recorded by US/Mexico border	Undetermined
CA-SDI-12258	Sparse Lithic Shatter	No testing recorded at least part destroyed	Undetermined
CA-SDI-12259	Sparse Lithic Shatter	No testing recorded, not currently developed	Undetermined
CA-SDI-12273H	Historic	Tested 1992,1994 mitigated	Not significant
CA-SDI-12337	Lithic Scatter	Combined several sites/tested 1978,1992, 1994,1996	Not significant
CA-SDI-13532	Sparse Lithic Scatter	Tested 1994, mitigated, site developed	Not significant
CA-SDI-14081	Sparse Lithic Scatter	Tested 1995 mitigated for road widening	Not significant
CA-SDI-14082	Sparse Lithic Scatter	Tested 1995 for Otay Mesa Rd. Widening, that portion mitigated	Not significant
CA-SDI-14083	Sparse Lithic Scatter	No record of testing, in MHPA Preserve	Undetermined
CA-SDI-14084	Sparse Lithic Scatter	No record of testing, in MHPA Preserve, possibly some disturb. by preserve vegetation	Undetermined
CA-SDI-14085H	Historic	Tested 1995 mitigated	Not significant
CA-SDI-14086H	Historic	Mitigated for SR-905	Not significant
CA-SDI-14087	Sparse Lithic Scatter	Mitigated for SR-905	Not significant
CA-SDI-14088	Sparse Lithic Scatter	No testing recorded poss. Impact from develop to the north	Undetermined
CA-SDI-14089	Artifact Scatter	Mislabeled on GIS map as 14889	Undetermined
CA-SDI-14090	Lithic Scatter	No testing recorded, in undeveloped area	Undetermined
CA-SDI-14091	Artifact Scatter	No testing recorded, in undeveloped area	Undetermined

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-14092	Sparse Lithic Scatter	No testing recorded in disturbed area	Undetermined
CA-SDI-14093	Sparse Lithic Scatter	No testing recorded next to developed area	Undetermined
CA-SDI-14094	Sparse Lithic Scatter	No testing recorded in undeveloped area	Undetermined
CA-SDI-14210	Historic	No testing recorded	Undetermined
CA-SDI-14238	Lithic Scatter	No testing recorded in undeveloped area	Undetermined
CA-SDI-14239	Lithic Scatter	No testing, not significant under Otay Mesa Management plan	Not significant
CA-SDI-14241	Lithic Scatter	Tested 1996 mitigated	Not significant
CA-SDI-14246	Lithic Scatter	Tested 1996,1999	Not significant
CA-SDI-14248	Lithic Scatter	Tested 1996,1999	Not significant
CA-SDI-14250H	Historic Scatter	Tested 1996, not mitigated	Undetermined
CA-SDI-14252	Sparse Lithic Scatter	Tested 1996, not mitigated	Undetermined
CA-SDI-14371	Sparse Lithic Scatter	No testing recorded in undeveloped area	Undetermined
CA-SDI-14559	Sparse Lithic Scatter	Tested 1996, not mitigated	Undetermined
CA-SDI-14728	Artifact Scatter	Tested 1996, not mitigated	Undetermined
CA-SDI-14729	Lithic Scatter	No testing recorded in undeveloped area	Undetermined
CA-SDI-16264H	Historic	Mitigated 2002	Not significant
CA-SDI-16397	Lithic Shatter/Shell	Tested 2002 data recovery necessary	Significant
CA-SDI-16398	Lithic Shatter/Shell	No testing recorded in undeveloped area	Undetermined
CA-SDI-16704	Sparse Lithic Scatter	No testing recorded in undeveloped area	Undetermined
CA-SDI-16705	Artifact Shatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-16706	Sparse Lithic Scatter	Tested in 2005 by ECORP Consulting, to be developed	Not significant
CA-SDI-17100	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17101	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17102	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17103	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17104	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17105	Sparse Lithic Scatter	Not tested considered non site by Otay Mesa Mang. Plan	Not significant
CA-SDI-17517	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-17518	Artifact scatter	Tested in 2005 by ECORP, to be developed	Significant
CA-SDI-17519	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-17520	Lithic scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-17521	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-17522	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-17523	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-17524	Lithic Scatter	Tested in 2005 by ECORP, to be developed	Not significant
CA-SDI-6699	Lithic Scatter	Tested and mitigated late 1980s developed	Not significant
CA-SDI-6941A-E	Artifact Scatter	Loci A-E mitigated for Cal-Terraces1987 development	Previously Mitigated
CA-SDI-6941F	Artifact Scatter	Mitigated 1995 for Otay Mesa Rd widening	Previously Mitigated
CA-SDI-6941H-X	Artifact Scatter	Tested in 1996 for Otay Mesa Rd widening	Not significant
CA-SDI-7208	Lithic Scatter	Portions mitigated for various projects 1988,1997 portions still undeveloped	Undeveloped portions undetermined
CA-SDI-7550	Temporary Camp	No record of testing, in undeveloped area	Undetermined
CA-SDI-7604	Temp Camp	Mitigated 1987, 1997 developed	Not significant
CA-SDI-7857	Lithic Scatter	Tested 1993 mitigated appears undeveloped	Not significant
CA-SDI-7983	Lithic Scatter/ Processing	Tested 1987 mitigated developed	Not significant
CA-SDI-7984	Lithic Scatter/ Processing	Tested 1987 mitigated developed	Previously Mitigated
CA-SDI-7985	Lithic Scatter	No record of test or mitigation., but area is developed	Undetermined
CA-SDI-8053	Isolate		Not significant
CA-SDI-8054	Isolate		Not significant
CA-SDI-8055	Isolate		Not significant
CA-SDI-8056	Isolate		Not significant
CA-SDI-8057	Isolate		Not significant
CA-SDI-8058	Isolate		Not significant
CA-SDI-8059	Isolate		Not significant
CA-SDI-8060	Isolate		Not significant
CA-SDI-8061	Isolate		Not significant
CA-SDI-8062	Isolate		Not significant
CA-SDI-8063	Isolate		Not significant
CA-SDI-8064	Isolate		Not significant
CA-SDI-8083	Lithic Scatter	Mitigation date not known area developed	Unknown
CA-SDI-8640	Artifact Scatter	Tested 1987,1988,mitigated currently undeveloped	Previously Mitigated
CA-SDI-8641	Lithic Scatter	Tested 1988 mitigated not currently developed	Previously Mitigated
CA-SDI-8642	Lithic Scatter	Tested 1988 mitigated not currently developed	Previously Mitigated
CA-SDI-8643	Lithic Scatter	Tested 1988 mitigated not currently developed	Previously Mitigated
CA-SDI-8644	Lithic Scatter	Tested 1988 mitigated not currently developed	Previously Mitigated
CA-SDI-8645	Lithic Scatter	Tested 1988 mitigated not currently developed	Previously Mitigated
CA-SDI-8750	Lithic Scatter	No record of testing, currently undeveloped	Undetermined
CA-SDI-8751	Lithic Scatter	No testing recorded, currently undeveloped	Undetermined
CA-SDI-8752	Lithic Scatter	No testing recorded, currently undeveloped	Undetermined
CA-SDI-8753	Lithic Scatter	No testing recorded, currently undeveloped	Undetermined

TABLE 5.5-2
RECORDED SITES WITHIN THE OTAY MESA COMMUNITY PLAN AREA
(continued)

Site #	Site Type	Status	Significance
CA-SDI-9098	Habitation	Data recovery 1983	Previously Mitigated
CA-SDI-9099	Artifact Scatter	No recorded work, area developed	Undetermined
CA-SDI-9100	Lithic Scatter/Historic	No testing recorded, currently undeveloped	Undetermined
CA-SDI-9541	Temporary camp	No recorded work, currently undeveloped	Undetermined
CA-SDI-9771	Lithic Scatter	Combined with several sites under CA-SDI-12337, tested various times	Not significant

NRHP = National Register of Historic Places.

d. Religious or Sacred Uses

Senate Bill 18 (SB 18), which was signed into law in 2004, requires cities and counties to consult Native American tribes prior to adoption or amendment of general plans or specific plans, including modifications to open space. This legislation became effective in March 2005. In response to a request by RECON in November 2006, the Native American Heritage Commission (NAHC) verified that there is no finding of a sacred site or burial within the CPU area. In addition, the City of San Diego submitted a request for consultation to the NAHC in accordance with SB 18. Letters were distributed to all tribal groups identified by the NAHC with a potential interest in the CPU on February 26, 2007. The City did not receive any requests for consultation from any of the tribal groups or individuals identified by the NAHC within the 90 day period.

e. Human Remains

There are no known human remains in the CPU area. There is a potential, however, for human remains to exist below the ground surface within the CPU area.

5.5.1.3 Regulatory Setting/Historic Preservation Plans, Policies and Standards

a. Federal

National Register of Historic Places

Federal criteria are those used to determine eligibility for the NRHP. The NRHP was established by the National Historic Preservation Act (1966). The NRHP is the official lists of sites, buildings, structures, districts, and objects significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Nominations to the NRHP may come from the various State Historic Preservation Offices, Tribal Historic Preservation Offices, local governments, and from private individuals and organizations. The NRHP criteria state that the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons important in our past;

C. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values; or

that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Certain properties are usually not considered for eligibility for the NRHP. These include ordinary cemeteries, birthplaces or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved or reconstructed, properties primarily commemorative in nature, or properties that have become significant within the last 50 years. These types of properties can qualify if they are an integral part of a district that does meet the criteria, or if they fall within certain specific categories relating to architecture or association with historically significant people or events. The vast majority of archaeological sites that qualify for listing do so under criterion D, research potential.

Native American Involvement

Native American involvement in the development review process is addressed when an undertaking under federal law triggers environmental review pursuant to the National Environmental Policy Act (NEPA). This often occurs when a project in funded by a federal agency or is being proposed by a federal agency and requires review under Section 106 of the National Historic Preservation Act. The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of project evaluation.

b. State

California Register of Historic Resources/California Environmental Quality Act

Similar to the NRHP, the California Register of Historic Resources (CRHR) program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria are those listed in CEQA and used to determine whether an historic resource qualifies for the CRHR. A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one or more of the four criteria listed below.

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
2. Is associated with the lives of persons important to the nation or to California's past.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

CEQA was amended in 1998 to define “historical resources” as a resource listed in or determined eligible for listing on the CRHR, a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant.

For the purposes of CEQA, a significant historical resource is one which qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the CRHR, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA (Section 15064.5 and CEQA Statutes Section 21083.2).

The City‘s determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines. Archaeological resources are considered “historical resources” for the purposes of CEQA. Most archaeological sites which qualify for the CRHR do so under criterion 4 (i.e., research potential).

Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance would be determined if they are affected by a development proposals. The significance of a historical resource under criterion 4 rests on its ability to address important research questions.

Native American Involvement

Native American involvement in the development review process is addressed by several state laws. The most notable of the state laws is SB 18 which includes detailed requirements for local agencies to consult with identified California Native American Tribes early in the planning and/or development process. The California Native American Graves Protection and Repatriation Act (2001), like the federal act ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

c. Local

Historical Resources Regulations

The Historical Resources Regulations (HRR) are part of the San Diego Municipal Code (Chapter 14, Article 3, Division 2: Purpose of HRR or Sections 143.0201-143.0280). The HRR have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and Section 106 of the National Historic Preservation Act (NHPA) of 1966.

Part of the HRR consists of a Development Review Process for all projects in the City. This review process is composed of two parts: implementation of the HRR and a determination of impacts and mitigation under CEQA. The implementation of the HRR begins with the determination of the need for a survey of the project site. The need for a survey is based on historical resource information and the date and results of any previous surveys of a project site. Surveys are required if more than five years have elapsed since the last survey and the potential for resources exists. A historic property (built environment) survey is required if the structure/site is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. Surveys must be conducted according to criteria in the Historical Resource Guidelines (HRG). If the survey results are negative, the review process is complete and no mitigation is required.

Historical resources, in the HRR context, include

> . . . site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city.

These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use (City of San Diego 2001).

In addition to direct and indirect impacts, cumulative impacts must also be addressed during the CEQA review process. Cumulative impacts are a result of individually minor but collectively significant projects occurring over a period of time. Data recovery may be considered a cumulative impact due to the loss of a portion of the resource data base. Cumulative impacts also occur in districts when several minor changes to contributing properties, their setting, or landscaping eventually results in a significant loss of integrity (City of San Diego 2001).

Historical Resources Guidelines

The City's Historical Resources Guidelines amended in April 2001 are designed to implement the Historical Resources Regulations contained in Chapter 14, Division 3, Article 2 of the LDC. If any resources have been recorded on the property, those resources must be evaluated for significance/importance in accordance with criteria listed in the Historical Resources Guidelines. Resources determined to be significant/important must either be avoided or a data recovery program for important archaeological sites must be developed and approved prior to permit issuance in order to assure adequate mitigation for the recovery of cultural and scientific information related to the resource's significance/importance.

General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan sets a series of goals for the City for the preservation of historic resources. The first of these goals is to preserve significant historical resources. These goals would be realized through implementation of policies that encourage the identification and preservation of historical resources. Specific policies are shown in Table 5.5-3.

TABLE 5.5-3
GENERAL PLAN HISTORIC PRESERVATION ELEMENT POLICIES

Policy	Description
HP-A.1	Strengthen historic preservation planning.
HP-A.2	Fully integrate the consideration of historical and cultural resources in the larger land use planning process.
HP-A.3	Foster government to government relationships with the Kumeyaay/ Diegueño tribes of San Diego.
HP-A.4	Actively pursue a program to identify, document, and evaluate the historical and cultural resources in the City of San Diego.
HP-A.5	Designate and preserve significant historical and cultural resources for current and future generations.
HP-B.1	Foster greater public participation and education in historical and cultural resources.
HP-B.2	Promote the maintenance, restoration, and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.
HP-B.3	Develop a historic preservation sponsorship program.
HP-B.4	Increase opportunities for cultural heritage tourism. Additional discussion and policies can be found in the Economic Prosperity Element, Section I.

SOURCE: City of San Diego General Plan 2008.

5.5.2 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, consists first of determining the sensitivity or

significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation.

Based on the City's Significance Determination Thresholds, impacts related to historical resources would be significant if the CPU would:

1. Result in the alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site;

2. Result in any impact to existing religious or sacred uses within the potential impact area; or

3. Result in the disturbance of any human remains, including those interred outside of formal cemeteries.

5.5.3 Issue 1: Prehistoric or Historical Impacts

Would the CPU result in the alteration or destruction of a prehistoric or historical archaeological site? Would the CPU result in any adverse physical or aesthetic effects on a prehistoric or historic building, structure, object, or site?

5.5.3.1 Impacts

The Historic Preservation Element of the CPU includes the following specific policies addressing the history and historical resources unique to the CPU area in order to encourage appreciation of the community's history and culture.

10.1-1 Require archaeological surveys and consultation with interested Native Americans as part of future development within Otay Mesa.

10.1-2 Consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American cultural sites that may be identified as part of future development within Otay Mesa.

10.1-3 Consider eligible for listing on the City's Historical Resources Register any structure or site from the agricultural era that may be discovered as part of future development within Otay Mesa.

10.1-4 Consider eligible for listing on the City's Historical Resources Register any buildings associated with early military aviation activities of the community that may be identified as part of future development within Otay Mesa.

10.2-1 Develop an interpretive program of Otay Mesa's history.

a. Identify designated historical resources, including the site of the Alta School and the Brown Field Historical District, with signs and markers.

b. Prepare a public display or brochure to highlight the agricultural and aviation history of Otay Mesa.

c. Specific plans for the village areas should include an interpretive program that highlights the history of Otay Mesa and any specific resources identified within the specific planning area.

10.2-2 Develop new incentives focused on the protection of Native American and archaeological resources, such as reduced permitting costs, increased floor area ratio, or larger building envelop when preserving significant cultural resources.

These policies, along with the General Plan policies, provide a comprehensive historic preservation strategy. The two overarching goals in the Historic Preservation Element are to preserve significant historical resources and to encourage educational opportunities and incentives to support historic preservation.

a. Archaeological Resources

Of the 262 recorded prehistoric and historic sites in the CPU area there are 180 remaining undeveloped or partially developed parcels, 10 of which have been evaluated and determined significant under CEQA or City guidelines. Based on the development footprint of the CPU, future development would have the potential to significantly impact all or a portion of 61 of these sites and any additional unrecorded sites.

Impacts from future development on historical resources in the CPU area would occur at the project level. Any grading, excavation, and other ground disturbing activities associated with future development implemented in accordance with the CPU that would affect significant archaeological sites or TCPs would represent a significant impact to historical resources. It should be noted however, that future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). For these project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no archaeological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of an Archaeological Survey prepared by a qualified archaeologist in accordance with the City's Historical Resources Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Historical Resources.

b. Historic Buildings, Structures, and Objects

Seven of the recorded structures/sites within the CPU have been designated as Historical Landmarks by the San Diego HRB. Impacts associated with historic buildings, structures, and objects would be the same as those identified for archaeological resources above. Impacts to resources associated with the built environment would include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites. Impacts from future development on the built environment would occur at the project-level. Any alteration, relocation, or demolition associated with future development that would affect historic buildings, structures, objects, landscapes, and sites would represent a significant impact to historical resources.

5.5.3.2 Significance of Impacts

Due to the number and density of prehistoric and historical resources in the CPU area, future development has the potential to result in the loss of resources, which would be a significant impact at the program level.

5.5.3.3 Mitigation Framework

Future commercial, business park and industrial development project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Historical Archaeological Resources further detailed below.

a. Archaeological Resources

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

INITIAL DETERMINATION

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

STEP 1:

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

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

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

STEP 2:

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

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

STEP 3:

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

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

STEP 4:

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

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

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to

the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

STEP 5:

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

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.

b. Historic Buildings, Structures, and Objects

HIST-2: Prior to issuance of any permit for a future development project implemented in accordance with the CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

a. Preparing a historic resource management plan;

b. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);

c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;

d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource; and

e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning.~~; and~~

~~f. Removing industrial pollution at the source of production.~~

Specific types of historical resource reports, outlined in Section III of the HRG, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

5.5.3.4 Significance after Mitigation

Future development implemented in accordance with the CPU and the supplemental development regulations for CPIOZ Type A (ministerial), would not be required to incorporate the Mitigation Framework measures and alternatives adopted in conjunction with the certification of this PEIR. However, for future development subject to review under CPIOZ Type B (discretionary), implementation of the Mitigation Framework measures adopted in conjunction with the certification of this PEIR would be required. Therefore, the program-level impact related to prehistoric or historical archaeological sites would be reduced to below a level of significance.

5.5.4 Issue 2: Religious or Sacred Uses

Would the CPU result in any impact to existing religious or sacred uses within the CPU area?

5.5.4.1 Impacts

The impact analysis for Issue 2 would be the same as outlined above for Issue 1, if religious or sacred places cannot be avoided. Spirituality of place is often impossible to define because it transcends material remains, which archaeologists can recover during significance testing or data recovery programs. Sever the connection that someone has to a religious or sacred place and you harm them in ways that cannot be mitigated. Therefore, significant, irrevocable impacts could occur through insensitive planning and project implementation. Impacts on sacred or religious places could result during construction activities associated with implementation of the CPU. Therefore, any impacts on historical resources associated with future projects would be considered significant.

5.5.4.2 Significance of Impacts

Impacts to known resources and those not yet found and formally recorded, could occur anywhere within the CPU. Future grading of original in situ soils could also expose buried historical archaeological resources and features including sacred sites. Potential impacts to historical resources associated with construction of future projects implemented in accordance with the CPU, would be considered significant.

5.5.4.3 Mitigation Framework

The Mitigation Framework for religious or sacred uses would be the same as outlined for Issue 1 - Archaeological Resources. Please refer to Mitigation Framework HIST-1.

5.5.4.4 Significance After Mitigation

Future development implemented in accordance with the CPU and the supplemental development regulations for CPIOZ Type A (ministerial) would not be required to incorporate the Mitigation Framework measures and alternatives adopted in conjunction with the certification of this PEIR. However, for future development subject to review under CPIOZ Type B (discretionary), implementation of the Mitigation Framework measures adopted in conjunction with the certification of this PEIR would be required as outlined in HIST-1 above. Therefore, the program-level impact related to religious or sacred uses would be reduced to below a level of significance.

5.5.5 Issue 3: Human Remains

Would the CPU result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.5.5.1 Impacts

The impact analysis for Issue 3 would be the same as outlined above for Issue 1 if impacts on human remains cannot be avoided. Native American remains, where tribal spiritual beliefs hold sacred that their ancestor's places of rest should not be disturbed. It is unavoidable in certain circumstances when human remains are discovered during construction. Impact thresholds for human remains depend on whether sites or places containing human remains occur within the potential impact area of a project. Although Native American human remains have not been identified in the CPU area, there is a potential for human remains to be encountered during future construction activities associated with implementation of the CPU. All future development implemented in accordance with the CPU would be subject to the development review process described in Section 5.5.1.3 to ensure compliance with federal, state and local criteria for the appropriate treatment of human remains. Any impacts would therefore be considered significant.

While it is preferable in all cases to avoid impacting human remains, this is not always possible given the uncertainties of late discoveries during construction. In the vicinity of a known cemetery or a prehistoric archaeological site suspected to be over 1,500 years old, interments are possible. Background research could help identify possible burial locations related to historic era properties. Forensic dogs or other nondestructive ground-penetrating techniques could help identify subsurface anomalies that might be related to the presence of inhumations. Forensic dogs have also been useful on sites where scattered cremation remains are present. When data recovery of an archaeological site is required, all possible pre-excavation planning would be implemented to guard against the accidental discovery of human remains. This would also apply to subsequent destruction of an archaeological site during project implementation because archaeological data recovery can never fully recover all the data from a site.

The discovery of human remains also demands that certain laws and protocols be followed before proceeding with any action that might disturb the remains further. If human remains are discovered, then the provisions set forth in California Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the NAHC.

5.5.5.2 Significance of Impacts

Impacts to known resources and those not yet found and formally recorded could occur anywhere within the CPU. Future grading of original in situ soils could also expose buried human remains. Potential impacts to historical resources associated with construction of projects implemented in accordance with CPU would be considered significant.

5.5.5.3 Mitigation Framework

The Mitigation Framework for human remains would be the same as outlined for Issue 1 - Archaeological Resources. Please refer to Mitigation Framework HIST-1.

5.5.5.4 Significance after Mitigation

Future development implemented in accordance with the CPU and the supplemental development regulations for CPIOZ Type A (ministerial) would not be required to incorporate the Mitigation Framework measures and alternatives adopted in conjunction with the certification of this PEIR. However, for future development subject to review under CPIOZ Type B (discretionary), implementation of the Mitigation Framework measures adopted in conjunction with the certification of this PEIR would be required as outlined in HIST-1 above. Therefore, the program-level impact related to human remains would be reduced to below a level of significance.

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5.6 Human Health/Public Safety/Hazardous Materials

This section is based on the Updated Hazardous Materials Technical Study (HMTS) prepared by Geocon (2012) to address the potential for impacts from the presence of hazardous materials/wastes on or within the vicinity of the CPU area and to discuss a mitigation framework to be implemented to reduce or eliminate the potential impacts. The study includes a review of regulatory agency databases, records review, limited visual site reconnaissance, and review of site history to identify potential environmental concerns and is included as Appendix F.

5.6.1 Existing Conditions

Hazardous materials are used in Otay Mesa for a variety of purposes including maintenance and operations at airfields, manufacturing, service industries, various small businesses, agriculture, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Businesses that handle/generate hazardous materials within the City are monitored by the U.S. EPA. Small quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

5.6.1.1 Federal, State, and Local Regulations

Numerous federal, state, and local laws and regulations pertaining to hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations include:

- 1972 Federal Water Pollution Control Act (also referenced as the Clean Water Act [CWA]). This act established a federal framework for the regulation of water quality.

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, also known as “Superfund,” and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.

- Federal Resource Conservation and Recovery Act (RCRA) of 1976. This act established the authority of the U.S. EPA to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.

- Title 40 CFR, Part 257, establishes criteria for the classification of solid waste disposal facilities and practices (Sections 257.1 to 257.30). The U.S. EPA has the authority under RCRA to authorize states to implement RCRA, and California is a RCRA authorized state.

- Title 40 CCR, Part 290 establishes technical standards and corrective action requirements for owners and operators of Underground Storage Tanks (USTs) under RCRA.

- Title 8 CCR, Industrial Relations, establishes laws regulating physical and chemical hazards in the work place. The California Division of Occupational Safety enforces these standards, including those related to asbestos-containing material, liquefied petroleum gas, storage tanks, and boilers.

- Title 23 CCR, Part 2620 regulates underground storage tanks with the intent to protect waters from contamination. This regulation establishes procedures for both new and existing tanks, as well as requirements for unauthorized release reporting, and for repair, upgrade, and closure of tanks.

- Water Quality Control Plan ("Basin Plan") for the San Diego region establishes policies and requirements for the protection of groundwater and surface water quality in the region. The Basin Plan also summarizes drinking water standards as specified in the California Department of Health Services, the California Inland Surface Waters Plan (State Water Resources Control Board [SWRCB] 1991), and Title 40 CFR Part 131, which establishes federal water quality standards under the CWA.

- San Diego County Area Plan (Area Plan), established by the County of San Diego Department of Environmental Health (DEH), Hazardous Materials Division, for the emergency response to a release or threatened release of a hazardous material within the County. The Hazardous Materials Program and Response Plan contained in the Area Plan serves the Otay Mesa area. As part of the Area Plan, the federal Risk Management Plan (RMP), is incorporated and modified by the State of California Accidental Release Prevention (CalARP) program, whose goal is to make all facilities that handle regulated substances free of catastrophic incidents.

- Hazardous Materials Transportation Act (49 CFR Parts 101, 106, and 107) is enforced by Caltrans and regulates hazardous materials transport. Unlicensed residents and businesses are not permitted to transport hazardous waste over 5.0

gallons or more than 50.0 pounds total per vehicle per trip, as enforced by the California Highway Patrol.

- The County has prepared a San Diego County Operational Area Emergency Plan and a Multi-jurisdictional Hazard Mitigation Plan. These documents provide guidance on emergency responses to a release or potential release of a hazardous substance, and identify risks for potential releases throughout the County.

- The City's Local Enforcement Agency (LEA) regulates solid waste within the City, including waste collection/disposal, illegal solid waste dumping, and hazardous solid waste sites requiring remediation.

- The City of San Diego Municipal Code includes general hazardous materials regulations (Sections 42.0801, 42.0901, and 54.0701) as well as regulations regarding specific hazardous materials such as explosives (Section 55.3301).

- To minimize fire risk, the City of San Diego Municipal Code includes regulations pertaining to brush management (Section 142.0412), construction materials for development near open space (Chapter 14, Article 5), and adequate fire flow.

Regulatory Listings

Regulatory agency records pertaining to the CPU area were reviewed by GEOCON. A search of federal, state, and local databases for the CPU area was also performed. A number of facilities within the CPU area appear on several regulatory listings. A summary of the information obtained from the various lists is presented as follows:

No Further Remedial Action Planned Listings

The No Further Remedial Action Planned (NFRAP) list is maintained by the U.S. EPA and includes archive-designated CERCLA sites where assessment has reportedly been completed and it has been determined that no further steps will be taken to include the site on the National Priority List (NPL) and no further remediation is required. The Brown Field Hazardous Waste Site (5675 Otay Valley Road) is the only property within the CPU area that appears on the NFRAP list.

Spills, Leaks, Investigations, and Cleanups Listings

Ten facilities located within the CPU area are referenced on the Spills, Leaks, Investigations, and Cleanups (SLIC) database. Off-site properties/facilities within ⅛-mile of the CPU area were not referenced on the SLIC database. A list of the referenced facilities is provided below.

- Brown Field, 1424 Continental Street
- Former U.S. Border Patrol Pistol Range, North of Pogo Row

- Former Rohr Engine Facility, 1500 Heritage Road
- Auto Recycling, 980 Otay Valley Road
- Kaiser Foundation, 4650 Palm Avenue
- OLA Imports and Exports, 935 Heritage Road
- Tripp Salvage Landfill (Sesi Property and Barnhart and Dantzler Property), west of northern termination of Cactus Road
- Martinez Ranch, 2160 Cactus Road
- Former Martinez Outdoor Storage, 2770 Martinez Ranch Road

Emergency Response Notification System and Hazardous Material Incident Report System Listings

The Emergency Response Notification System (ERNS) and the Hazardous Material Incident Report System (HMIRS) databases were reviewed for facilities with reported hazardous substance release incidents. The ERNS database is a national database used to collect information on reported releases of oil and hazardous substances. Fifteen facilities located within the boundaries of the CPU area are listed on one or both of these databases. Off-site facilities within ⅛ mile of the CPU area were not referenced on either database. Information in the database listings for the 15 facilities within the CPU area indicates that the releases generally consisted of surficial spills of fuel or temporary exposure of workers or personnel to noxious fumes that were mitigated by or under the oversight of the local fire department or office of emergency services. In addition, these 15 facilities do not appear on any other database that reports unauthorized releases of hazardous substances. Based on this information and the nature of the releases, there is low likelihood that these facilities present an environmental concern to the CPU area.

Solid Waste Facilities/Landfill Listings

The Solid Waste Facilities/Landfill Sites (SWF/LF) database is maintained by the California Department of Resources Recycling and Recovery (CalRecycle) and lists solid waste facilities, operations, and disposal facilities throughout the state of California. The 2012 HMTS included a review of solid waste facilities within the CPU area. One waste facility within the boundaries of the CPU area is listed on this database, Tripp Salvage Landfill. This landfill is comprised of two adjacent properties located west of the northern termination of Cactus Road, the Barnhart and Dantzler Property and the Sesi Property. One waste facility was also identified outside the CPU area, the Shinohara II Burn Site located on the south side of the Otay River.

The following facilities were identified in the 2012 HMTS as solid waste disposal sites, but were not referenced on the SWF/LF listings or on databases that report releases of hazardous materials:

- Former INS Shooting Range;
- Organic Recycling West, 1202 La Media Road;
- Dillons Trail Site;
- Martinez Ranch Canyon Fill; and
- San Ysidro Burn Site.

Underground Storage Tank Listings

Eighteen facilities within the CPU area and one facility outside the CPU area are referenced as containing either registered USTs (UST database), active or inactive USTs (SWEEPS database), or historical USTs (HIST UST database). Five of the 19 listings are associated with facilities within the CPU area that are also listed on the Leaking Underground Storage Tank (LUST) database. These listings are identified as:

- Brown Field, 1424 Continental Street;
- Piper Ranch;
- Former Rohr Engine Facility, 1500 Heritage Road;
- Arco Service Station, 2510 Otay Center Drive; and
- Air Liquide Industrial, 9955 Via De La Amistad.

The referenced facility located outside the CPU area is Former Red Cab, 803 East San Ysidro Boulevard, which is also listed on the LUST database. However, based on information provided in the LUST database, it is unlikely that operations at this facility have negatively impacted the CPU area. The remaining 13 listings are not on databases that report unauthorized releases of hazardous substances. As such, there is a low likelihood that these 13 listings present an environmental concern.

EnviroStor Listings

One facility was identified on the Department of Toxic Substances Control (DTSC) EnviroStor database: Honeywell, Inc., 2055 Dublin Drive. This facility is reportedly under DTSC oversight for permitted hazardous waste disposal. References regarding unauthorized releases of hazardous substances were not noted in EnviroStor. In addition, this facility is not listed on databases that report unauthorized releases of hazardous substances or petroleum. As such, there is a low likelihood that this facility presents an environmental concern.

LUST and CORTESE Listings

The LUST (Leaking Underground Storage Tank) list includes database information maintained by the SWRCB, as well as information maintained by the DEH. The SWRCB database includes sites with confirmed or unconfirmed leaking USTs. Four leaking UST facilities are located within the CPU area on the LUST and/or CORTESE databases. The four facilities are Brown Field (1424 Continental Street), Former Rohr Engine Facility (1500 Heritage Road), Arco Service Station (2510 Otay Center Road), and Air Liquide Industrial (9955 Via de la Amistad). Two facilities outside the CPU area within 1/8-mile of the CPU area are also referenced on the LUST and/or CORTESE databases. These two facilities are City of San Diego General Services Yard, 4515 Otay Mesa Road (adjacent to the west of the CPU area) and Former Red Cab, 803 East San Ysidro Boulevard (approximately 530 feet west of the CPU area).

Orphan Summary

An Orphan Summary was also included as part of the HMTS database review. The Orphan Summary identifies properties/facilities that have incomplete address information and could not be specifically plotted. A total of 290 properties/facilities were listed in the Orphan Summary; however, in some cases, multiple records were listed for the same property/facility. Based on the distances of these properties/facilities from the CPU area and the nature of the databases on which the listings appear, 283 of the 290 records do not appear to present an environmental concern.

The remaining seven listings are associated with properties/facilities interpreted to be located within or in proximity to the boundaries of the CPU area and referenced on databases that report unauthorized releases of hazardous substances, petroleum, or waste disposal facilities. Information regarding these properties/facilities is provided below.

- Otay Mesa Road Widening Project;
- Piper Ranch;
- Former Dennery Ranch;
- Shinohara I Burn Site;
- Southbay Operations Center;
- Britannia Boulevard Property; and
- South Bay Burn Site.

5.6.1.2 Sites of Potential Environmental Concern

The 2012 HMTS identified 23 sites of potential environmental concern located within the CPU area. The 23 sites are described specifically in Table 5.6-1. These sites were ranked

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Otay Mesa Widening Project	Adjacent to north and south of Otay Mesa Road	3	A 1996 site assessment identified petroleum hydrocarbon and pesticide impacted soil adjacent to Otay Mesa Road in the area of the widening project. Although the soil generated during the widening project was determined not to contain detectable concentrations of these compounds, the potential exists for impacted soil to remain in place.	No mitigation measures are anticipated to be required. However, if additional grading is conducted adjacent to Otay Mesa Road in the area of the former widening project, observations should be made for the presence of impacted soil. If encountered, the impacted soil should be segregated and characterized for potential reuse or disposal options.
Brown Field Operations Area	1424 Continental St.	1	An active Leaking Underground Storage Tank (LUST) case is associated with this facility for petroleum hydrocarbon impacts to soil and groundwater. Releases associated with an additional 24 LUST or spill cases have reportedly resulted in an estimated 111,500 cubic yards of hydrocarbon-impacted soil remaining in-place at the facility.	High likelihood that additional mitigation measures will be required. Soil and/or groundwater sampling would be required to assess the extent of the existing contamination prior to redevelopment of this area. Remediation, consisting of excavation and disposal of contaminated soil or in-situ treatment of contaminated soil, may be required to mitigate potential health risks.
San Diego Space Surveillance Station (Former U.S. Border Patrol Pistol Range)	North of Pogo Row	1	Assessment in 2000 found that at least 3,500 cubic meters of soil at this former facility contained high concentrations of lead, and other metals. The western portion of this former facility was subsequently redeveloped with a U.S. Border Patrol maintenance station and the eastern portion is currently occupied by the San Diego Space Surveillance Station (SDSSS). A workplan was prepared in 2012 to conduct an investigation of soil and debris in the area of a former small arms range and skeet range located on the SDSSS facility. In addition, the workplan proposes the excavation and disposal of lead and polycyclic aromatic hydrocarbon impacted soil previously identified at both of these former ranges.	High likelihood that additional mitigation measures will be required including assessment, excavation, and disposal of impacted soil and debris.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Former INS Shooting Range (Currently Vacant)	Northeast of eastern termination of Pogo Row	2	In 1987, fill material containing burn ash and sand blast grit was deposited at the INS Shooting Range to create safety berms. Upon discovery of the contaminated material, remediation activities were conducted, including excavation of contaminated soil. Residual lead-impacted soil remains on-site that capped with concrete. Facility was issued a no further action designation in 2002.	Low likelihood that additional mitigation measures will be required provided the concrete cap remains in-place. Should future redevelopment include removal or disturbance of the cap, an environmental consultant should be retained and the City LEA contacted.
Former Organic Recycling West (Currently Vacant)	1202 La Media Road	3	This facility is a composting facility that only accepts "green" and "woody" materials. During a July 2006 Local Enforcement Agency (LEA) inspection, spills were noted in the vicinity of vehicles and batteries west of vehicular maintenance area. A County of San Diego Department of Environmental Health (DEH) release case was not opened as a result of the spills, indicating the spills were considered minor.	No mitigation measures are anticipated to be required. Impacted soil, if encountered during future redevelopment, should be segregated and characterized for potential reuse or disposal options.
Piper Ranch (Currently a Business Park)	West of Piper Ranch Road	3	Waste oil and pesticide-contaminated soil excavated and removed in 1988. Gasoline release from a underground storage tank (UST) removed in 1988 resulted in contamination of two cubic yards of soil. DEH closed the UST case due to limited extent of contamination. Subsequent sampling of the property in 1988, 1989, and 1994 indicated various pesticides were detected but concentrations were below less than regulatory screening levels. The property is currently improved with several commercial/light-industrial developments.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.
Former Dennery Ranch (Currently an Apartment Complex)	North of Intersection of Dennery Road and Red Fin Lane	2	Approximately 5,000 cubic yards of burn ash deposits, originating from the Shinohara II Burn Site, are present over an approximately 0.5-acre area in the northwestern portion of this property. In 2009, the City Local Enforcement Agency approved a plan to construct a 2-foot-thick vegetative soil cap over the burn ash deposits. Property was redeveloped with single-family homes in 2007-2008.[1]	Low likelihood that additional mitigation measures will be required provided the vegetative soil cap remains in-place. Should future redevelopment include removal or disturbance of the cap, an environmental consultant should be retained and the City LEA contacted.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Shinohara I Burn Site	North of Otay River (City of Chula Vista)[1]	2	Approximately 850,000 cubic yards of burn ash material were placed at the Shinohara I and II Burn Sites in 1978. Majority of the burn ash material subsequently was excavated and removed from Shinohara I site in 1993 and 2001. Approximately 1,500 cubic yards of burn ash left in place. County LEA issued closure letter in 2001.	Moderate likelihood that additional mitigation measures will be required. During future excavation activities, an environmental consultant should be retained to observe the property for evidence of contaminated soil (e.g., discoloration, odors). If evidence of contamination is found, the soil should be segregated and characterized for potential reuse or disposal options.
Shinohara II Burn Site	Adjacent to the north of former Dennery Ranch (City of Chula Vista)[1]	1	Approximately 850,000 cubic yards of burn ash material were placed at the Shinohara I and II Burn Sites in 1978. Up to a 40-foot-thick layer of burn ash is believed to exist at the property. Reportedly, additional assessment or mitigation activities have not been performed at the Shinohara II Burn Site to date.	High likelihood that additional mitigation measures will be required under the oversight of the County LEA. Mitigation measures would likely include soil excavation and disposal and /or construction of a cap over the burn ash material. A health risk assessment may also be required depending on future land use.
South Bay Operations Center	Northwest of northern termination of Air Wing Road.	3	Petroleum hydrocarbon release from a UST removed in 2007. DEH closed the UST case in 2011 due to limited extent of contamination. An estimated 200 cubic yards of impacted soil remain in-place in the area of the former UST.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.
Former Rohr Engine Test Facility (Currently Vacant)	1500 Heritage Road	3	Two cases associated with this former facility for releases of aviation fuel in 1987 and 1992 that impacted soil. Both cases have been closed by DEH; however, residual impacted soils may remain at this property.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.
Auto Recycling	980 Otay Valley Road	4	Release of diesel from an unreported source affected soil at this facility. Associated DEH case was closed in 2007; however, residual impacted soils may remain at this property.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Kaiser Foundation	4650 Palm Avenue	3	Gasoline from an overturned tanker reportedly entered a storm drain below the sidewalk adjacent to this facility. Sediment in the storm drain and soil and groundwater in the vicinity of the storm drain outfall at the Otay River were determined to be impacted. Following soil remediation activities and cleanup of groundwater to well below public health standards, DEH closed the case in 2011.	The release appears to have been limited to areas outside the boundaries of this facility. As such, no mitigation measures are anticipated to be required for this facility.
OLA Imports and Exports	935 Heritage Road	2	Staining observed during assessment activities in 1995 and numerous DEH violations from 1996 to 2007 at this facility indicate that petroleum-impacted soil likely remains at shallow depths (up to of depths of 5 feet) in various locations at the facility. The DEH noted that they have no objection to the continued use of the facility as an auto recycler provided that they are notified prior to surface grading or proposed changes in land use.	DEH records reviewed indicate that the case associated with this facility will not be closed until assessment of the extent of petroleum impacts has been performed. Likely mitigation measures would include segregation and characterization of impacted soils for potential reuse or disposal options.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Dillons Trail Site	Southwest of southern termination of Caliente Avenue	2	The Dillons Trail Site consists of several parcels where illegal disposal activities were initially discovered by the County LEA in 1987. The discarded material primarily consisted of demolition debris with minor amounts of solid waste. According to the City LEA, the majority of the waste from the illegal disposal activities at the property has been removed, and the City LEA no longer conducts inspections at this location. During the site reconnaissance, we observed evidence of illegal disposal of trash and debris throughout the interpreted location of the property. The City LEA, ESD, MSCP, and SDPD are all involved in a joint effort to clean up illegally dumped waste and prevent future illegal dumping on the site. Increased surveillance in the area has been effective at reducing dumping at this location. The City MSCP program has been acquiring the property to preserve it as open space, vernal pool habitat.[1]	High likelihood that additional mitigation measures, including trash/debris removal and disposal, will be required prior to redevelopment of this area. Chemical containers encountered during the trash/debris removal activities should be properly characterized and disposed of. If evidence of contaminated soil (e.g., discoloration, odors) is encountered during future redevelopment activities, it should be segregated and characterized for potential reuse or disposal options.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Barnhart and Dantzler Property	West of northern termination of Cactus Road	2	Formerly a part of the Tripp Salvage Landfill. Automobile dismantling waste was placed on the Barnhart and Dantzler Property from approximately 1968 to 1977. This material was covered with fill from other landfills in the area. It is estimated that the waste extends to a depth of approximately 65 feet. Groundwater samples collected from this property in 1998 reportedly contained VOCs, SVOCs, and metals. Total area containing waste is approximately 1.1 acres, and an asphalt cap was constructed over the areal extent of the waste in 2001. The County LEA issued "no further action" letter in 2003 for this property. The SR-905 expansion has been constructed over Barnhart Landfill location, and the site is now owned by Caltrans. The disposal site is under the jurisdiction of the City LEA, which must be consulted prior to any construction activities in the vicinity.[1] The Dantzler portion of the landfill is under an asphalt cap on private property. The City LEA must be consulted prior to any construction activities that may disturb the integrity of the cap.[1]	Low likelihood that additional mitigation measures will be required provided the asphalt cap remains in-place. Should future redevelopment include removal or disturbance of the cap at the Dantzler site or any construction activity near the Barnhart site, an environmental consultant should be retained and the City LEA contacted.[1]

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Sesi Property	Adjacent to the south of Barnhart and Danzler Property	1	Part of Tripp Salvage Landfill. Automobile dismantling waste was placed on the Sesi Property from approximately 1968 to 1977, and burn ash-contaminated soil was placed in on the property in 1987. This material was covered with fill from other landfills in the area. It is estimated that the waste extends to a depth of approximately 65 feet. Groundwater samples collected from this property in 1998 reportedly contained VOCs, SVOCs, and metals. A Revegetation Plan prepared 2006 proposed excavation of a portion of the waste and placement of a soil cap over the remaining waste. According to the County LEA, soil cap design and associated grading plans have been submitted to City of San Diego for review but the cap has not yet been constructed. The City of San Diego Development Services Department approved a grading permit to construct a soil cap to provide an adequate engineered cap over buried waste.[1]	Construction of the approved Remedial Action Work Plan as described in the Site Development Permit, in accordance with the grading permit, would provide adequate mitigation of this potential environmental concern.[1]
Martinez Ranch Compound	2160 Cactus Road	1	Soil sampling conducted in 2004 indicated that approximately 17,300 to 26,100 cubic yards of soil in the northeastern portion of Martinez Ranch were impacted with elevated concentrations of the pesticides DDE, DDT, and/or toxaphene. According to the DEH, the pesticide-impacted has not been mitigated.	High likelihood that mitigation of the pesticide-impacted will be required prior to redevelopment of this area.
Martinez Ranch Canyon Fill	Southwest of Martinez Ranch Compound	1	Analysis of soil samples collected in 2004 from the canyon fill showed elevated concentrations of petroleum hydrocarbons and lead. According to the DEH, the hydrocarbon and lead-impacted has not been mitigated.	High likelihood that mitigation of the hydrocarbon and lead-impacted will be required prior to redevelopment of this area.

TABLE 5.6-1
PROPERTIES/FACILITIES OF POTENTIAL ENVIRONMENTAL CONCERN
(continued)

Property	Location	Level of Environmental Concern*	Rationale	Recommended Mitigation
Former Martinez Outdoor Storage (Currently Innovative Cold Storage Enterprises)	2770 Martinez Ranch Road	3	Analysis of soil samples collected in 2009 showed detections of petroleum hydrocarbons related to a former AST and several pesticides related to historical agricultural use, but at concentrations below health screening levels for commercial/industrial land use.	Low likelihood that mitigation measures will be required provided the property continues to be zoned for commercial /industrial land use. If future plans for this property include residential development, further assessment of pesticides and petroleum hydrocarbons in soil would likely be required.
Britannia Boulevard Property (Currently occupied by a Business Park)	2133 Britannia Blvd	3	Soil samples analyzed in 2003 showed elevated concentrations of pesticides in shallow soil at this property. To mitigate the potential health risks, a concrete cap was constructed over the entire property. In addition, a deed restriction was recorded for the property on March 26, 2004, that stated the property was not suitable for uses that include "full-time human habitation."	Low likelihood that mitigation measures will be required provided the concrete cap continues to be maintained and the deed restriction remains in-place for the property. If land uses excluded in the deed restriction are planned for the property, the DTSC should be contacted.
Arco Service Station	2510 Otay Center Road	3	In 2003, a release of gasoline occurred in the area of the eastern dispenser island at this facility that affected soil only. The DEH closed the case in 2005 following excavation and disposal of approximately 138 cubic yards of impacted soil. An estimated 38 cubic yards of impacted soil remain in-place in the area of the eastern dispenser island.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.
Air Liquide Industrial	9955 Via de la Amistad	3	In 2004, a release of diesel was discovered in the area of a former dispenser island at this facility that affected soil only. The DEH closed the case in 2006 following excavation and disposal of approximately 15 cubic yards of impacted soil. An estimated 6 cubic yards of impacted soil remain in-place in the area of the former dispenser island.	Low likelihood that additional mitigation measures will be required. However, if residual impacted soil is encountered during future redevelopment, it should be segregated and characterized for potential reuse or disposal options.

*Level of Environmental Concern: (1) potentially significant impact, (2) less than significant impact with mitigation incorporation, (3) less than significant impact, or (4) no impact.

[1]SOURCE: Personal communication, Bill Prinz, City of San Diego, 2012.

with an impact level of 1 to 4: (1) potentially significant impact, (2) less than significant impact with mitigation incorporation, (3) less than significant impact, or (4) no impact. Of the 23 sites identified in the HMTS, 11 were ranked as less than significant, 5 were ranked as less than significant with mitigation, and 6 were identified as potentially significant. One site (Kaiser Foundation) was determined to have no impact.

The six sites (two of which are under the City's LEA) of potential significance are listed below:

- Martinez Ranch Canyon Fill;
- Martinez Ranch Compound;
- Sesi Property;
- Shinohara II Burn Site;
- San Diego Space Surveillance Station (Former U.S. Border Patrol Pistol Range); and
- Brown Field Operations Area.

5.6.1.3 Wildfire Hazards

Extended droughts characteristic of the CPU area's Mediterranean climate result in large areas of dry vegetation, particularly in late summer and fall, when Santa Ana winds blow in from the desert and dry out the vegetation. Potential wildfire risk zones within the CPU area are the areas that have steep slopes, limited precipitation, and plenty of available vegetation fuel. Currently, the CPU area contains undeveloped land that is occupied by a variety of native and non-native plant communities. Due to the amount of natural, unmaintained open space on the CPU area, the area poses a high risk for wildfires. As areas near natural open space undergo development, the risk of fire increases.

Current City regulations require that brush management zones be established adjacent to development to reduce the risk from wildland fires. Pursuant to the LDC, a Brush Management Program is required for future development within the CPU area. The purpose of such a program is to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. In all the areas requiring brush management, a combination of two brush management zones occurs. Zone 1 consists of paving or ornamental plantings, which would be located within the development pad of each residential lot. Zone 2 involves the selective thinning and pruning of native vegetation and is considered impact neutral.

5.6.1.4 Aircraft Hazards

The state requires that the San Diego County Regional Airport Authority Board, as the ALUC, prepare an ALUCP for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, over flight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area for each airport over a 20-year horizon. The City of San Diego implements the adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). The City has agreed to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations until the ALUC determines that the City's land use plans are consistent with the ALUCPs.

The Brown Field Municipal Airport is located within the CPU area. Brown Field Municipal Airport provides business, corporate, training, and charter aviation services that support commercial and industrial activities within the region. The airport helps relieve general airport congestion at Lindbergh Field and is a POE for private aircraft coming from and going to Mexico.

5.6.1.5 Emergency Preparedness

The County of San Diego Office of Emergency Services (OES) coordinates the overall county response to disasters. OES is responsible for: notifying appropriate agencies when a disaster occurs; coordinating all responding agencies; ensuring that resources are available and mobilized; developing plans and procedures for response to and recovery from disasters; and developing and providing preparedness materials for the public.

OES staffs the Operational Area Emergency Operations Center, a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The UDC, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for coordination of plans and programs countywide to ensure protection of life and property.

In 2010, the County and 18 local jurisdictions, including the City of San Diego, adopted the Multi-hazard Mitigation Plan (MHMP). The MHMP is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The plan is a comprehensive document that serves many purposes, including creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing interjurisdictional coordination (County of San Diego 2011).

The City of San Diego's disaster prevention and response activities are conducted in accordance with U.S. Department of Homeland Security Office of Domestic Preparedness

requirements and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's Emergency Operations Center (EOC), including being responsible for maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident (City of San Diego 2008a).

5.6.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, a significant health and safety impact would occur if the CPU would:

1. Expose people or property to health hazards, including wildfire and airport operations;

2. Create a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation) or expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials; or

3. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

5.6.3 Issue 1: Health and Safety Hazards

Would the CPU expose people or property to health hazards, including wildfire and airport operations?

5.6.3.1 Impacts

a. Health Hazards

Potential health hazards associated with the CPU relate to the use, disposal, or transport of hazardous materials; and/or exposure to sites containing hazardous materials, including pesticides associated with current and past agricultural operations, and exposure to air contaminants. The use, disposal, or transport of hazardous materials is of potential concern where sensitive land uses such as residential, parks, or institutional uses are in proximity to industrial uses. This issue is addressed in Section 5.6.4 below. Exposure to sites containing hazardous materials is discussed in Section 5.6.5 and exposure to air contaminants is discussed in Section 5.3, Air Quality.

b. Wildfire Hazards

The City of San Diego receives limited precipitation; therefore, the potential for wildland fires represents a hazard, particularly on undeveloped properties or where development is adjacent to open space or within close proximity to wildland fuels. As the CPU would maintain an extensive network of natural open space, development adjacent to this open space would be subject to a significant risk of fire hazards. Existing policies and regulations would help reduce, but not eliminate, risks from wildfires. The City's General Plan contains goals to be implemented by the City's Fire-Rescue Department, and sustainable development and other measures aimed at reducing the risks of wildfires.

Additionally, CPU policy 6.1-3 is intended to reduce the risk of wildfire hazards. Policy 6.1-3 would enforce Brush Management Regulations in vacant areas in order to reduce the risk of fire-related emergencies. Pursuant to LDC Section 142.0412 et seq., brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires submittal of Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

- **Zone One** would consist of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone would not be allowed on slopes with a gradient greater than 4:1.

- **Zone Two** would consist of the area between Zone One and any area of native or non-irrigated vegetation and shall consist of thinned native or naturalized vegetation.

In addition, as a standard condition of approval, all future development within the CPU area would be required to comply with the 2010 California Fire Code (CFC) requirements and the LDC Section 145.0701 et seq., "Additions and Modifications to Chapter 7 of the 2010 California Building Code." The CFC provides specific building requirements, including prohibitions on the use of wood shingles and special requirements for the provision of emergency access and water. Future development proposals would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards.

c. Aircraft Hazards

Proposed land uses within the AIA, as defined by the Brown Field Municipal Airport ALUCP, adopted in January 2010, would result in the potential exposure of people to safety hazards.

The AIA for Brown Field extends well outside the airport property, north into the City of Chula Vista; east into unincorporated San Diego County; south to the International Border and west into the Cities of Imperial Beach and National City. The Safety Zones as established by the ALUCP also extend to both the east and west outside of the airport property.

Policies and criteria contained in the ALUCP for Brown Field are implemented by the supplemental development regulations in the Airport Land Use Compatibility Overlay Zone of the Municipal Code. In order to ensure that future development within the CPU area addresses airport land use compatibility issues consistent with adopted policies and regulations, the CPU Noise Element includes Policy 9.1-1. Policy 9.1-1 states that "Prior to the approval of individual development projects for any proposed building or use located within the AIA for Brown Field, all applicable conditions and criteria in the Airport Land Use Compatibility Plan for Brown Field shall be satisfied."

Implementation of this policy would ensure that buildout of the CPU area would occur in a manner consistent with the adopted ALUCP for Brown Field, and related policies and regulations. Therefore, the implementation of the General Plan and CPU policies that address land use compatibility would support the development of future uses consistent with the adopted ALUCP and preclude any health and safety impacts of off-airport aircraft accidents.

The ALUCP does not address existing structures or uses that would be incompatible or considered a hazard; therefore, existing uses and structures within the CPU area would continue to pose a safety hazard to airport operations. While the ALUCP contain policies and criteria to limit future incompatible uses and safety impacts, they cannot prevent aircraft accidents from occurring such as a loss of power after takeoff.

5.6.3.2 Significance of Impacts

a. Health Hazards

Please refer to Section 5.3, Air Quality and Sections 5.6.4, and 5.6.5, below, for a discussion of exposure to health hazards. As indicated in those sections, hazardous sites have been identified that could result in significant impacts to future development within the CPU area.

b. Wildfire Hazards

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires.

Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards.

Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code.

However, because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. Therefore, impacts associated with wildfires would be significant at the program-level.

c. Aircraft Hazards

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

5.6.3.3 Mitigation Framework

a. Health Hazards

Please refer to Sections 5.3, 5.6.4, and 5.6.5. In accordance with the CPU policies, mitigation identified in Sections 5.3, 5.6.4, and 5.6.5 shall be required to reduce potential health hazards to future development from hazardous sites.

b. Wildfire Hazards

HAZ-1: Future projects implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to GP and CPU policies intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.

c. Aircraft Hazards

Future projects developed in accordance with the CPU have the potential to conflict with FAA requirements and result in a significant aircraft hazards impact. To avoid this impact, the following shall be implemented:

HAZ-2: To prevent the development of structures that may pose a hazard to air navigation, the City shall inform project applicants for future development concerning the existence of the Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. The City shall also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City shall not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Also, the City shall not recommend approval of subsequent development projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

5.6.3.4 Significance after Mitigation

a. Health Hazards

Please refer to Sections 5.3.5, 5.6.4, and 5.6.5. Implementation of the mitigation framework identified in Section 5.6.5.3 would reduce potential health hazards associated with hazardous sites to below a level of significance. As indicated in Section 5.3.5.4, with implementation of the Mitigation Framework, impacts related to exposure to air toxics would remain significant and unavoidable.

b. Wildfire Hazards

Implementation of the mitigation framework identified in Section 5.6.3.3 under HAZ-1 would reduce potential wildfire hazards to below a level of significance.

c. Aircraft Hazards

Future projects developed in accordance with the CPU have the potential to conflict with FAA requirements and result in a significant aircraft hazards impact. With implementation of HAZ-2, potential future project aircraft hazards impacts would be reduced to below a level of significance.

5.6.4 Issue 2: Hazardous Substances

Would the CPU create a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation)? Would the CPU expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?

5.6.4.1 Impacts

Several uses that would be allowed within the commercial, industrial, or multiple use designations of the CPU, including gasoline service stations, automobile repair facilities, dry cleaning facilities, various industrial facilities, chemical facilities, photograph developing facilities, and medical and dental facilities, would use or dispose of hazardous materials. The areas of greatest concern would be in the village centers and where residential, institutional, or park uses would be adjacent to facilities which utilize hazardous substances. n addition, many of the existing land uses within the CPU area use or dispose of hazardous materials, including six on the LUST list that are associated with DEH Site Assessment and Mitigation cases, representing potential environmental concerns to the CPU area. For this reason, the CPU incorporates several measures to reduce the potential for hazards.

As part of the CPU process, opportunities for employment uses and areas appropriate for workforce housing near job centers have been identified. Uses with nuisance or hazardous characteristics are restricted to Heavy Industrial designated areas and would be segregated from other uses. In addition, the CPU establishes several policies for residential-industrial interface areas and an internal interface area within village centers and designated Business Park-Residential Permitted areas. The CPU policies include performance standards to protect health, safety, and welfare of residents and users. The only industrial uses permitted with the Community Village and Business Park-Residential permitted designations are multi-tenant industrial office, corporate headquarters, and compatible research and development uses. In addition, subsequent development projects would be subject to environmental review and approval in accordance with the development standards and supplemental regulations for CPIOZ, and the following CPU policies to ensure appropriate uses reduce the potential for hazards.

The CPU development policies and design guidelines for residential-industrial interface areas (collocation) include:

2.2-4 Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.

2.4-2 Provide adequate land use buffers and/or distance separation from residential uses for heavy industrial proposals with hazardous or toxic substances.

a. Consider office, commercial, retail, and parking uses as acceptable buffer uses within the village freeway interface area.

b. Locate schools, parks, and libraries outside of interface areas. (See Section 5.3 Air Quality for details about facilities and buffer distances.)

c. Determine distance separation on a case-by-case basis based on an approved study submitted by an applicant, or if no study is prepared, provide a 1,000-foot minimum distance separation.

d. Apply the buffer to sensitive receptors located along the Mexican Border.

2.4-3 Reduce or mitigate the environmental and negative impacts of Heavy Industrial uses on surrounding areas, such as noise, visual, and air quality impacts. Consider design elements that include, but are not limited to, landscape, site orientation, fencing, and screening.

2.4-4 Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.

2.4-7 Allow for a wide range of businesses that do not negatively impact sensitive receptors to locate in the Business Park and areas adjacent to parks and village areas.

a. Provide adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to public parks and educational facilities.

~~a.~~b. Develop synergy with the adjacent village and public facility uses to maximize non-vehicular trips.

2.4-9 Provide adequate buffers, such as land uses, landscape, walls, and distance between the residential component of the Business Park – Residential Permitted lands, SR-905, and Britannia Boulevard to minimize negative impacts of air quality, noise, and truck transportation on residents.

4.1-10 Create a visual and distance separation between the public right-of-way and industrial uses such as auto dismantling, truck transportation terminals, and other uses that create noise, visual, or air quality impacts. Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening.

4.1-17 Require a distance separation, which may include landscape treatments, parking, sidewalks, and street right-of-way, between the IBT and Heavy Industrial uses of the South District and the village and educational facilities of the Central District.

4.2-2 Incorporate connectivity and walkability in the design of the street network.

a. Apply traffic-calming techniques that address vehicular/truck and pedestrian movements where the truck routes are adjacent to village and park uses.

b. Accommodate pedestrians along Britannia Boulevard and La Media Road with sidewalks that are non-contiguous to the curb to provide greater separation between pedestrians and vehicular travel lanes.

c. Incorporate U-6 Urban Parkway Configurations from the Street Design Manual for design of sidewalks and parkways along Airway Road.

d. Separate pedestrians from vehicular traffic along Beyer Road and Ocean View Parkway, and design sidewalks to accommodate heavy pedestrian traffic to provide safe access to schools.

e. Design the street systems for the Southwest Village and the Central Village as a grid or modified-grid that utilizes existing paper streets for the north-south streets.

f. Create blocks that are no longer than 400 feet in length within residential, commercial, and Village areas to provide short street segments and walkable block sizes.

g. Activate vibrant village cores using street furniture, sidewalk cafes, and public spaces.

h. Provide commercial alleys to allow rear deliveries, reduce traffic congestion, improve aesthetics, enhance parking access and reduce the need for curb cuts.

i. Incorporate residential alleys to allow for rear garages, additional off-street parking, trash pick-up, and pedestrian areas.

~~, such as popouts, raised crosswalks, and parkways at truck route intersections with Airway Road and where the truck routes are adjacent to village and park uses~~.

4.5-10 Create a visual buffer between Heavy Industrial sites and public streets, public facilities, and open space.

a. Create a berm within the setbacks facing the public right-of-way.

b. Place a masonry wall along the berm, with variation breaks for articulation.

c. Include a landscape buffer between the sidewalk or street and the berm and wall for additional screening.

d. Require street trees from Appendix B, the Street Tree Plan for Otay Mesa.

7.1-12 Site the Grand Park at the southwestern corner of Cactus and Airway Roads.

a. Site the Grand Park beyond any buffer areas for industrial to the east and south.

b. Establish pedestrian linkages to the village areas to the west and north.

8.7-5 Maintain an adequate buffer with transitional uses between land uses that allow sensitive receptors and the truck routes.

8.7-6 Maintain an adequate buffer with transitional uses between land uses that allow sensitive receptors and the Heavy Industrial and International Business and Trade designations.

Additionally, future development projects would be required to comply with the collocation policies of the General Plan, which are necessary to reduce or avoid potential land use incompatibility impacts (including hazardous materials), and which would include but not be limited to the special policies and performance standards for residential-industrial interface areas, truck circulation, and industrial design; as well as the relevant and mandatory city, state, and federal controls on industrial and residential land uses.

Existing federal, state, and local regulations and procedures pertaining to the handling, storage, and transport of potentially hazardous materials would apply to all future development within the CPU area. As noted in the Section 5.6.1.1 and the Mitigation Framework, a number of local, state, and federal regulations address the prevention of accidental releases of chemicals that would affect human health. The CalARP Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of property. Facilities that would be required to participate in the CalARP program use or store specified quantities of toxic and flammable substances (hazardous materials) that would have off-site consequences if accidentally released. The County of San Diego DEH reviews CalARP risk management plans.

State law (California Health and Safety Code) requires the mapping of “general areas” within which hazardous waste facilities would be established. Proposed hazardous waste facilities areas would not be permitted within the CPU.

Truck traffic from industrial uses including international truck traffic as it relates to the transport of hazardous materials and would include fuel delivery, hazardous waste transportation, sewer or water treatment service trucks, or other chemical transporters that would pose significant impacts in the event of an accidental release or explosion. ~~As discussed in Section 5.12, Transportation/Circulation, of this EIR specific truck circulation~~

~~routes would be implemented with the CPU in order to limit truck hazards to specific locations away from residential and public areas.~~ The transport of hazardous materials is a regulated activity and transporters would be required to obtain permits prior to operations. As part of the permit process and in close coordination with affected agencies and City departments, specific truck circulation routes would be identified in order to limit truck hazards to specific locations away from residential and public areas. In addition, the City of San Diego Fire-Rescue Department maintains a Hazardous Materials Incident Response Team which is trained to protect lives and property from incidents involving hazardous materials such as chemical explosions and spills. The transport of hazardous materials is a regulated activity and transporters would be required to obtain permits prior to operations.

Under the CPU, existing industrial and commercial land uses that generate, transport, or temporarily store hazardous waste within the vicinity of residential uses would remain in some areas. Additionally, trucks serving local businesses would expose residents to hazards associated with the release of hazardous materials (i.e., spillage; accidents, and explosions) that would be transported through the CPU area.

5.6.4.2 Significance of Impacts

The CPU proposes new uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations that would allow certain business and industrial operations to generate, transport, or temporarily store hazardous waste within the vicinity of residential uses. Additionally, trucks serving local businesses ~~w~~could expose residents to hazards associated with the release of hazardous materials (i.e., spillage; accidents, and explosions) that would be transported through the CPU area. ~~Improved roadway and transportation modifications~~The designation of truck routes within the CPU area along with roadway improvements in conjunction with buildout of the circulation network would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Implementation of the policies contained in the General Plan, CPU, and regulations imposed by federal, state, and local agencies, including the U.S. EPA, RCRA, California Department of Health Services (DHS), County of San Diego DEH, and Caltrans, as summarized above, would reduce potential impacts to below a level of significance.

5.6.4.3 Mitigation Framework

Because no significant impact has been identified, no mitigation is required. Disclosure of adherence to the requirements outlined in the City's Municipal Code related to minimizing potential impacts from hazardous materials, as well as any regulations imposed by federal, state and other local agencies would be required during the discretionary review process.

5.6.4.4 Significance after Mitigation

As noted above in Section 5.6.4.1, implementation of the policies contained in the General Plan, CPU, and regulations imposed by federal, state, and local agencies, including the U.S. EPA, RCRA, California Department of Health Services (DHS), County of San Diego DEH and Caltrans would reduce potential impacts to below a level of significance. For example, disclosure laws require all users, producers, and transporters of hazardous materials to clearly identify materials they store, use, or transport and to notify the appropriate agency in the event of a violation. ~~Future development would be subject to discretionary review with subsequent environmental review to ensure risks are minimized.~~ Subsequent development projects would be subject to environmental review and approval in accordance with the development standards and supplemental regulations for CPIOZ and applicable CPU policies to ensure appropriate uses reduce the potential for hazards. Impacts would be less than significant.

5.6.5 Issue 3: Hazardous Sites

Would the CPU uses be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

5.6.5.1 Impacts

The HMTS identifies a number of sites within the CPU area as containing hazardous materials, which would present a significant hazard to the public or the environment through the approval of future development within the CPU area. Details on the contaminant(s) located within the CPU area, along with any past remedial efforts/environmental studies that have been completed for sites within the CPU area, are discussed in detail in the 2012 Updated HMTS (see Appendix F).

Of the 23 sites of potential environmental concern (refer to Table 5.6-1), six were determined to pose a potentially significant hazard to future development within the CPU area. Development in accordance with the CPU has the potential to place sensitive receptors on, or adjacent to, these known hazardous materials sites. Any development or redevelopment proposed for residential, or other sensitive land uses within these areas represents a potential significant impact to health and safety. Furthermore, there is also the potential for unknown hazardous material sites to be present in the CPU area. Unknown sites not identified the HMTS would have the potential to create a significant hazard to the public or the environment. In addition, any property proposed for future development within ¼ mile of a known release site (open or closed) has the potential to result in a significant impact to human health and safety.

Existing regulations, as described in Section 5.6.1.1, also require that future projects demonstrate that the site is suitable for the proposed land use. For sites with recorded hazardous material concerns, project applicants would obtain confirmation from the DEH that the site has been remediated to the extent that it is required for the proposed use. For example, residential development requires a greater level of remediation than a commercial or industrial use.

Future projects with the potential to expose inhabitants to unacceptable levels of contamination associated with hazardous materials sites would result in significant impacts. The following CPU policies are designed to reduce the risk of health and safety hazards from the previously discussed hazardous sites within the CPU area:

6.11-1 Implement established remediation protocols to reduce public health risks to negligible levels.

6.11-2 Require documentation of hazardous materials investigation addressing site and building conditions during review of all development projects.

5.6.5.2 Significance of Impacts

The presence of sites compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the CPU area.

5.6.5.3 Mitigation Framework

In accordance with CPU policies 6.11-1 and 6.11-2, future projects implemented in accordance with the CPU shall be required to identify potential conditions which require further regulatory oversight and demonstrated compliance based on ~~implement~~ the following measures prior to ~~approval of any discretionary action.~~issuance of any ministerial permit:

HAZ-3:

a. A Phase I Site Assessment shall be completed in accordance with federal, state, and local regulations for any property identified on a list compiled pursuant to Government Code Section 65962.5. The report shall include an existing condition survey, detailed project description, and specific measures proposed to preclude upset conditions (accidents) from occurring. If hazardous materials are identified, a Phase II risk assessment and remediation effort shall be conducted in conformance with federal, state, and local regulations.

b. The applicant shall retain a qualified environmental engineer to develop a soil and groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil,

groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The groundwater management and monitoring plans shall be approved by the City prior to development of the site.

c. The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by the local regulatory agencies (RWQCB/DTSC/DEH) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.

d. The applicant shall obtain written authorization from the regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation. A copy of the authorization shall be submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEH shall be notified of the proposed land use.

e. All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with applicable regulatory agencies such as but not limited to San Diego Municipal Code Section 42.0801, Division 9 and Section 54.0701.

5.6.5.4 Significance after Mitigation

Future development implemented in accordance with the CPU would be required to implement the Mitigation Framework adopted in conjunction with certification of this PEIR which requires preparation of a Phase I Site Assessment, consultation with the appropriate regulatory and verification that health risk has been remediated in accordance with all applicable local, state and federal regulations. In addition, as noted above in Section 5.6.4.1, implementation of the policies contained in the General Plan, CPU, and regulations imposed by federal, state, and local agencies, including the U.S. EPA, RCRA, California Department of Health Services (DHS), County of San Diego DEH and Caltrans would reduce potential impacts to below a level of significance.

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5.7 Hydrology/Water Quality

This section addresses the flow and quality of surface and ground water within the CPU area. A Drainage Study of the CPU area was prepared by Kimley Horn & Associates (2007). This document is included as Appendix G-1 to this PEIR. An additional document, entitled Review of Otay Mesa Drainage Studies, was prepared by Tetra Tech in 2010 to provide a summary of previous drainage including the aforementioned Drainage Study. Among other things, this document updates the regulatory framework and the existing condition of these past studies and assesses the application of their conclusions in conjunction with the CPU. This document is included as Appendix G-2 to this PEIR. Appendix G-3 to the PEIR is a Water Quality Technical Report prepared by Kimley Horn & Associates (2007) for the CPU.

5.7.1 Existing Conditions

The hydrology of the CPU area is affected by absorption rates, drainage patterns, and the rate of surface runoff. Absorption rate is the time required for pervious ground to absorb rainwater. Drainage patterns are the footprints of travel of unabsorbed water from high elevations to lower elevations. The rate of surface runoff is how quickly unabsorbed water travels within a drainage system to receiving water. Urbanization increases surface runoff rates by creating more impervious surfaces, such as paving and buildings, which prevent percolation of water into the soil. Instead, water goes to the streams which would result in increased flood risk. Urbanization also increases water pollution, as pollutants would drain into receiving waters without being filtered through soils.

5.7.1.1 Watershed Management Areas, Hydrologic Units, and Hydrologic Subareas

The State Water Resources Control Board and Regional Water Quality Control Board are responsible for protecting California's water resources. California is divided into nine regions, also referred to as basins, based on major watersheds. The RWQCBs are located within these regions. Each of the RWQCBs contributed a chapter outlining watershed management strategies to the SWRCB's Watershed Management Initiative (WMI) to further their goals. As dictated by the WMI, there are six watershed management areas (WMAs) located within the City's boundary.

The San Diego RWQCB prepared the Water Quality Control Plan for the San Diego Basin (Basin Plan; 1994), which identifies the water quality objectives for waters in the basin and further subdivides it into hydrologic units (HUs), hydrologic areas (HAs), and hydrologic subareas (HSAs). A hydrologic unit is defined as the entire watershed of one or more major streams. Hydrologic areas consist of watersheds of major tributaries and/or major groundwater basins within a hydrologic unit. Hydrologic subareas are major

subdivisions of hydrologic areas including both water-bearing and non-water-bearing formations.

With one exception, the WMAs consist of the entirety of a hydrological unit and the adjoining coastal waters. The exception is the San Diego Bay WMA, which consists of the San Diego Bay and three other HUs (908–Pueblo San Diego, 909–Sweetwater, and 910–Otay).

As shown in Figure 5.7-1, the northern portion of the CPU area (2.229 acres) is located within the San Diego Bay WMA, the Otay HU (910), the Otay Valley HA (910.2), and the Otay Valley HSA (910.20). The Otay HU is described by the Basin Plan as a club-shaped area of about 160 square miles with the Otay River and its tributaries as its major stream system. The Lower Otay Reservoir is the terminus of the second San Diego Aqueduct. Major population centers within the watershed include Imperial Beach, Coronado, and Dulzura. Annual precipitation varies generally from 11 to 19 inches.

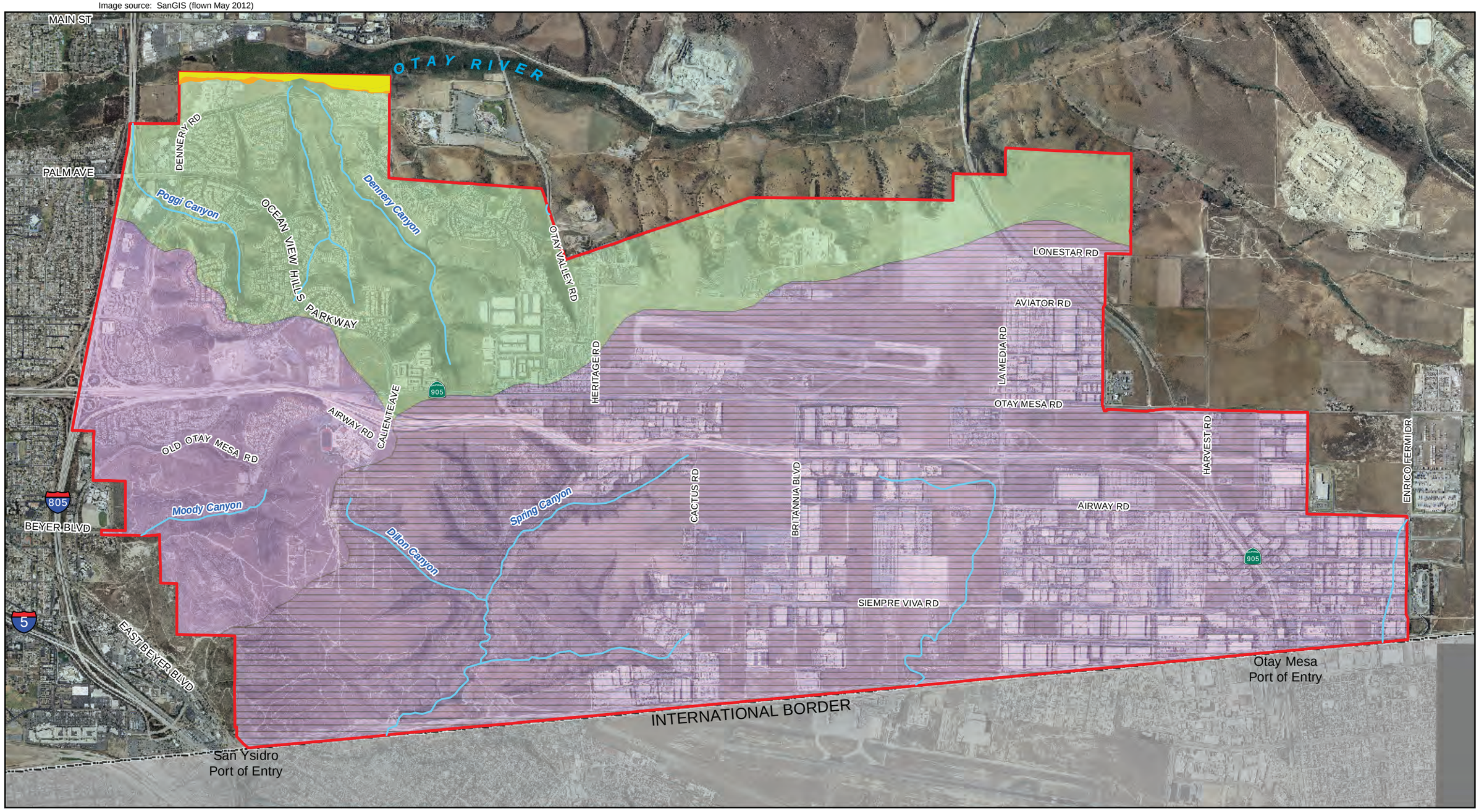
The southern portion of the CPU area (7,080 acres) is located within the Tijuana River WMA, the Tijuana HU (911), and the Tijuana Valley HA (911.1). As shown in Figure 5.7-1, the western portion of the CPU is within the San Ysidro HSA (911.11), while the southeast portion is within the Water Tanks HSA (911.12). As described by the Basin Plan, the Tijuana HU (see Figure 5.7-1) is drained by Cottonwood and Campo creeks which are tributaries to the Tijuana River. This HU covers an area of about 470 square miles and is sparsely populated except at the major population centers at San Ysidro and Campo. The annual rainfall varies from less than 11 inches to more than 25 inches near Laguna Mountain. Runoff is captured by Morena Reservoir and Barrett Lake on Cottonwood Creek.

The Tijuana River WMA is not entirely within the jurisdiction of the San Diego RWQCB. The Tijuana River WMA covers a total of 1,720 square miles in California and Mexico. Approximately 467 square miles, or 27 percent, of this watershed lies in California under the jurisdiction of the San Diego RWQCB; the remainder lies in Mexico. Water flows from across the international border from the U.S. to Mexico, and from Mexico to the U.S. Raw sewage discharges into the Tijuana River from Mexico have adversely affected water quality and pose a public health threat to residents on both sides of the border (RWQCB 2002).

Surface Waters/Drainage Patterns

Most of the CPU area drains to the south across the border with Mexico and eventually into the Tijuana River. A small portion flows north into the Otay River, and the far western part of the CPU area flows to the west through San Ysidro and then into the Tijuana River.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

National Hydrography Dataset Streams

FEMA Flood Zone

100 Year Flood Zone

500 Year Flood Zone

Watershed Management Area, Hydrologic Unit, Hydrologic Area, Hydrologic Subarea

San Diego Bay, Otay, Otay Valley, Otay Valley

Tijuana River, Tijuana, Tijuana San Ysidro

Tijuana River, Tijuana, Tijuana Valley, Water

0 Feet 2,500

FIGURE 5.7-1

Existing Hydrologic Conditions

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As detailed in Appendix G-2 and shown in Figure 5.7-2, the three drainage areas found in the Otay Mesa Study Area are Otay Valley, San Ysidro, and Water Tanks. Otay Valley covers north of Otay Mesa around the Otay River, San Ysidro covers west of Otay Mesa, and Water Tanks covers south of Otay Mesa. Otay Valley and Water Tanks are sub-divided into east and west areas respectively. Therefore, there are five total drainages for the Otay Mesa area.

The five drainage areas, which comprise the CPU area, and their approximate acreages are shown in Table 5.7-1 below.

TABLE 5.7-1
OTAY MESA CPU DRAINAGE AREAS

Drainage Areas	Acres
Otay Valley (East)	827.5
Otay Valley (West)	1,378.4
San Ysidro	1,226.1
Water Tanks (East)	3,380.2
Water Tanks (West)	2,488.0
Total*	9,300.2

*Boundaries within different source data sets may have slight variations, thus, resulting in an acreage discrepancy.

5.7.1.2 Receiving Waters

a. Beneficial Uses

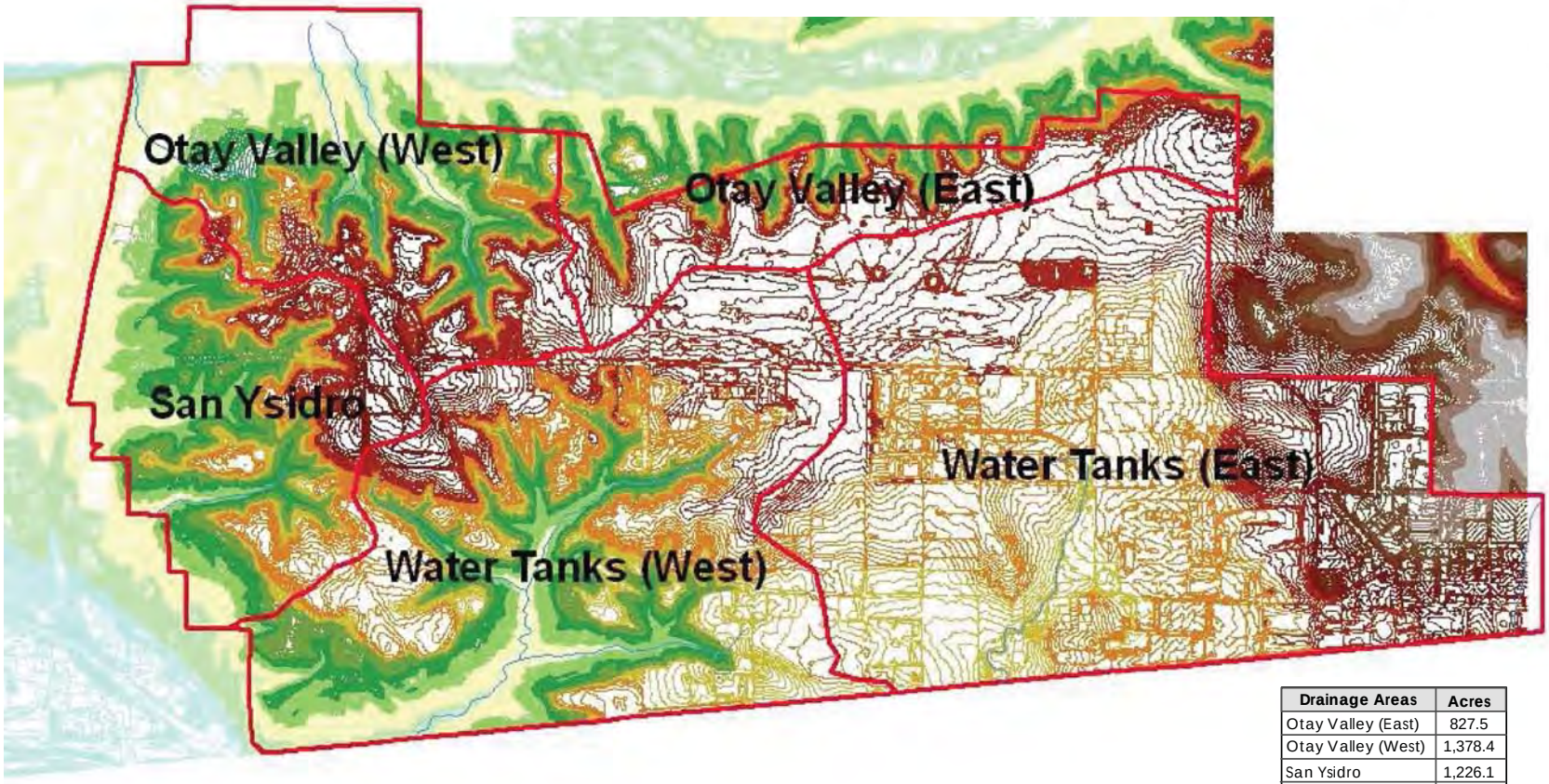
The San Diego RWQCB is the regional agency that is responsible for establishing ground and surface water quality objectives for the San Diego region, which are identified in the Basin Plan.

Beneficial uses are the uses of water necessary for the survival or well-being of humans, plants, and wildlife. These uses of water serve to promote economic, social, and environmental goals. Water quality objectives and beneficial uses can be found in the Basin Plan. The Basin Plan assigns multiple beneficial uses pertaining to inland surface water, ground water, and coastal waters within the Otay and Tijuana WMAs.

Tijuana Hydrologic Unit of the Tijuana River Watershed Management Area

Beneficial uses of the inland surface water include municipal and domestic supply, agricultural supply, industrial service supply, industrial process supply, freshwater replenishment, contact water recreation, non-contact water recreation, warm freshwater habitat, wildlife habitat, and rare, threatened, or endangered species. Beneficial uses of the groundwater include municipal and domestic supply, agricultural supply, and industrial service supply. Beneficial uses of the coastal waters include industrial service supply, navigation, commercial and sport fishing, contact water recreation, non-contact

Map Source: City of San Diego



Drainage Areas	Acres
Otay Valley (East)	827.5
Otay Valley (West)	1,378.4
San Ysidro	1,226.1
Water Tank (East)	3,380.2
Water Tank (West)	2,488.0
Total	9,300.2

Streams (NHD) Drainage Areas

No Scale

FIGURE 5.7-2
Drainage Areas

water recreation, biological habitats of special significance, estuarine habitat, wildlife habitat, rare, threatened, or endangered species, marine habitat, migration of aquatic organisms, and shellfish harvesting.

Otay Hydrologic Unit of the San Diego Bay Watershed Management Area

Beneficial uses of the inland surface water include municipal and domestic supply, agricultural supply, industrial service supply, industrial process supply, contact water recreation, non-contact water recreation, warm freshwater habitat, wildlife habitat, and rare, threatened, or endangered species. Beneficial uses of groundwater include municipal and domestic supply, agricultural supply, industrial service supply, and industrial process supply. Beneficial uses of the coastal waters include industrial service supply, commercial and sport fishing, navigation, contact water recreation, non-contact water recreation, estuarine habitat, wildlife habitat, rare, threatened, or endangered species, marine habitat, migration of aquatic organisms, shellfish harvesting, and spawning, reproduction and/or early development.

b. Impaired Water Bodies

In accordance with the federal Clean Water Act section 305(b), the SWRCB and RWQCBs periodically compile an inventory of the state's major waters and the water quality condition of those waters, using monitoring data and other pertinent information. Waters are categorized as good, intermediate, impaired, or of unknown quality. Impaired waters are categorized in accordance with requirements of various Clean Water Act sections (e.g. 303[d]).

According to the 2010 State Impaired Water Bodies 303(d) List of Water Quality Limited Segments, the San Diego Bay is listed as an impaired water body for polychlorinated biphenyls (PCBs). The Tijuana River is listed as an impaired water body for eutrophic, indicator bacteria, low dissolved oxygen, pesticides, phosphorus, sedimentation/siltation, selenium, surfactants, solids, synthetic organics, total nitrogen, toxicity, trace elements, and trash.

5.7.1.3 Groundwater

The geotechnical study for the project, prepared by Geocon Incorporated, found that near surface groundwater (less than 20 feet deep) is unlikely to occur in the geologic formations found within the CPU area, and groundwater is not anticipated to be a consideration for most of the developable areas along the top of Otay Mesa. Small areas of alluvium in canyon bottoms would potentially contain groundwater and localized perched water conditions would develop during the wet season in some of the drainage canyon areas.

5.7.1.4 Flood Hazards

Most of the CPU area is very flat, resulting in local flooding during storms at the low points and along some drainage ditches. The main channel in the East Watershed, Otay Mesa Creek, flows from north to south along La Media Road and crosses the border into Mexico just north of the General Abelardo L. Rodriguez International Airport. As detailed in Appendix G-1, a hydraulic model was prepared as part of the study for this channel from the border north to Otay Mesa Road. The purpose of this model was to identify the 100-year floodplain for this area. As shown in Figure 5.7-1, an area within the northwest watershed along the Otay River is designated as FEMA 100- and 500-year floodplains. As shown in Figure 5.7-2, the hydraulic model showed that the area adjacent to the Otay Mesa Creek channel is within a 100-year floodplain.

5.7.1.5 Existing Drainage Facilities

The existing drainage system throughout the CPU area is a combination of storm drains, improved channels, and detention basins, which in many areas discharge to natural drainage paths.

There are currently no dedicated drainage easements within the CPU area. Many existing projects, as they were mapped and constructed, were required to dedicate portions of the properties to the City as drainage easements or flood water storage easements as a condition of project approval (i.e., development permits, tentative maps).

5.7.1.6 Existing Regulatory Framework

Various federal, state, and local regulations impose requirements on new development for erosion control, control of runoff contaminants, and control of direct discharge of water quality pollutants. These requirements are summarized below.

a. Federal Clean Water Act

The Clean Water Act is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The Clean Water Act established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the Clean Water Act.

Section 401 of the Clean Water Act requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the Clean Water Act established the National Pollution Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters

of the U.S. Implementation of the Clean Water Act is the responsibility of the U.S. EPA, which has delegated much of that authority to the U.S. Army Corps of Engineers, as well as state and regional agencies.

The Section 303(d) process of the Clean Water Act requires states to identify surface waters that have been impaired. Under Section 303(d), states, territories, and authorized tribes are required to develop a list of water quality segments that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology. The 303(d) is updated by the RWQCB and SWRCB biannually. As discussed above, portions of both the Tijuana and Otay rivers are listed as impaired water bodies in the 2010 303(d) List.

b. Federal Emergency Management Agency Flooding Regulations

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas (SFHAs). The Federal Emergency Management Agency (FEMA) provides subsidized flood insurance to communities that comply with FEMA regulations. The SFHAs and other risk premium zones applicable to each participating community are depicted on Flood Insurance Rate Maps (FIRMs).

Sections 143.0145 and 143.0146 of the City's Municipal Code contain updated development regulations within SFHAs. As detailed above in Section 5.7.1.4 and shown on Figure 5.7-1, in the northwestern portion of the CPU along the Otay River (the 100-year flood zone) is considered a SFHA.

c. Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal Clean Water Act. The state of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the Clean Water Act under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and groundwater basins and establish water quality objectives for those waters.

d. Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The

basin is composed of 11 major HUs, 54 HAs, and 147 Hydrologic Subareas, extending from Laguna Beach southerly to the U.S.-Mexico border. Drainage from higher elevations in the east flows to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body. Beneficial uses are defined as: "the uses of water necessary for the survival or well-being of man, plants and wildlife. These uses of water serve to promote the tangible and intangible economic, social and environmental goals of mankind" (RWQCB 2011).

e. California Department of Fish and Wildlife–Streambed Alteration

The CDFW is responsible for protecting, conserving, and managing wildlife, plant, fish, and riparian resources in the state of California. Under Sections 1600–1607 of the CDFW Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for a project that impacts certain CDFW jurisdictional resources. Such an agreement with CDFW would most likely require mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or combination of all.

f. Storm Water Management and Discharge Control Regulation (San Diego Municipal Code § 43.0301, et seq.)

The purposes of this division of the Municipal Code are to further ensure the health, safety, and general welfare of the citizens of the City of San Diego by controlling non–storm water discharges to the storm water conveyance system; by eliminating discharges to the storm water conveyance system from spills, dumping, or disposal of materials other than storm water; and by reducing pollutants in urban storm water discharges to the maximum extent practicable.

g. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the Municipal Code outlines storm water runoff and drainage regulations which apply to all development in the City, regardless of whether or not a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for developments within the City. The Drainage Design Manual requires projects to

coordinate proposed designs with existing structures and systems handling the same flows to ensure that new projects would not result in any increased runoff or generate increased sediment or pollutants.

h. Storm Water Standards Manual

The City's Storm Water Standards Manual, Appendix O of the City's Land Development Manual, provides information to project applicants on how to comply with the permanent and construction storm water quality requirements contained in the Municipal Storm Water Permit, discussed below. Primary elements of the Storm Water Standards Manual include:

- LID BMPs Requirements;
- Source Control BMPs;
- BMPs Applicable to Individual Priority Development Project Categories; and
- Treatment Control BMPs.

LID BMPs require that an area be dedicated on-site to retain storm water for infiltration, reuse, or evaporation. The Storm Water Standards Manual states:

> For Priority Development Projects [e.g., tentative maps and development permits, construction permits, and public projects that have not begun initial design or that have not been deemed complete prior to a certain date], the feasible portion of the post-project runoff volumes and peak flows from the water quality design storm . . . shall be infiltrated on-site. If it is shown to be infeasible to infiltrate the requisite volume of water, that water may be retained on-site for re-use or evapotranspiration. If it is shown to be infeasible to retain the requisite volume of water, then that water must be treated with treatment control BMPs.

The Storm Water Standards Manual also addresses "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations.

The Storm Water Standards Manual provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs, monitoring of the weather and implementation of emergency plans as needed, and provides minimum performance standards, including pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site would not be greater than pre-construction levels, and natural hydraulic features and riparian buffers must be preserved where possible.

i. General Plan

The City's General Plan presents goals and policies for storm water and drainage infrastructure in the Public Facilities, Services, and Safety Element, and presents goals and policies for open space (including floodplain management) and urban runoff management in the Conservation Element. Relevant General Plan policies are included in Table 5.7-2.

j. Applicable Permits

Pursuant to Section 402 of the Clean Water Act, the U.S. EPA has established regulations under the NPDES program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting programs and is responsible for developing waste discharge requirements. The RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that would directly apply to design and construction projects within the CPU area include the SWRCB Construction General Permit, 2009-0009-DWQ, discussed below, and the City's Municipal Storm Water Permit.

Municipal Storm Water Permit

The Municipal Storm Water NPDES Permit, approved May 8, 2013, by the San Diego RWQCB, requires the City to implement regulations for the oversight of urban runoff and storm water inputs into surface waterways within the San Diego Region. An NPDES permit is a means of assuring that proper measures including BMPs are implemented during all phases of activities that occur within a municipality that can affect urban runoff and storm water quality. The permit is issued in order to establish the conditions under which pollutants would be discharged from the storm drain system to local streams, coastal lagoons, and the ocean, implementing requirements of the Clean Water Act and federal NPDES storm water regulations.

TABLE 5.7-2
GENERAL PLAN POLICIES RELATED TO WATER QUALITY

Policy	Description
PF-G.1	Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California RWQCB NPDES Permit standards.
PF-G.2	Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.
PF-G.3	Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.
PF-G.5	Identify and implement BMPs for projects that repair, replace, extend, or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.
PF-G.6	Identify partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements.
CE-B.1	Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities. a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
CE-B.2	Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands. a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits. b. Limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.
CE-B.4	Limit and control runoff, sedimentation, and erosion both during and after construction activity.
CE-E.1	Continue to develop and implement public education programs. a. Involve the public in addressing runoff problems associated with development and raising awareness of how an individual's activities contribute to runoff pollution. b. Work with local businesses and developers to provide information and incentives for the implementation of Best Management Practices for pollution prevention and control.

TABLE 5.7-2
GENERAL PLAN POLICIES RELATED TO WATER QUALITY
(continued)

Policy	Description
	c. Implement watershed awareness and water quality educational programs for City staff, community planning groups, the general public, and other appropriate groups.
CE-E.2	Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff. a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements in development permit conditions.
CE-E.3	Require contractors to comply with accepted storm water pollution prevention planning practices for all projects. a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.
CE-E.4	Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.
CE-E.5	Assure that City departments continue to use "Best Practice" procedures so that water quality objectives are routinely implemented. a. Incorporate water quality objectives into existing regular safety inspections. b. Follow Best Management Practices and hold training sessions to ensure that employees are familiar with those practices. c. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources. d. Ensure that contractors used by the City are aware of and implement urban runoff control programs. e. Serve as an example to the community-at-large.

TABLE 5.7-2
GENERAL PLAN POLICIES RELATED TO WATER QUALITY
(continued)

Policy	Description
CE-E.6	Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system. a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations. b. Review plans for new development and redevelopment for connections to the storm drain system. c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.
CE-E.7	Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

SOURCE: City of San Diego General Plan 2008.

The City is a co-permittee under the Municipal Storm Water Permit. As a co-permittee, the City must implement several storm water management programs, including programs designed to control storm water discharges from new development and redevelopment. Specific sections of the Municipal Storm Water Permit that apply to design and construction include Section E.3, Development Planning Component, and Section E.4, Construction Component. These titles refer to required components of the City's Jurisdictional Urban Runoff Management Program (JURMP), which is one of the programs that must be implemented by the City under the Municipal Storm Water Permit.

The JURMP encompasses City-wide programs and activities designed to prevent and reduce storm water pollution within City boundaries; and includes plans to protect and improve water quality of rivers, bays, and the ocean in the City. The document describes how the City incorporates storm water BMPs into land use planning, development review, and permitting; City capital improvement program project planning and design; and the execution of construction contracts.

Proposed activities in the Tijuana River WMA include sponsored trash cleanups, targeted restaurant and auto-related facility inspections, aggressive street sweeping, municipal rain barrel installation, trash segregation BMP installation, and inlet bacteria treatment BMP installation.

As previously detailed, the City implements storm water control requirements through their JURMP and Storm Water Standards Manual. In addition, Section E of the Municipal Permit, Total Maximum Daily Loads (TMDL), provides requirements for TMDLs and for the maximum amount of a given pollutant such as chemicals, bacteria, or sediment that can be released to a given water body. A TMDL is a "pollution budget" designed to help restore the beneficial uses of an impaired water body. A TMDL defines the maximum amount of a pollutant the water body can safely receive while meeting the water quality objectives identified in the Basin Plan. The City also implements these requirements through their Storm Water Standards Manual, and these requirements would affect design of permanent post-construction BMPs.

Among BMPs employed where the increase in impervious surfaces increases runoff rates and volumes would include:

- Detention basins, effective for very large drainage areas. These are essentially ponds with controlled release rates to minimize downstream effects. Some pollutants can settle during storage and improve the quality of water released. In addition, detention basins reduce the amount of sediment load contained in storm water runoff, prior to releasing stored runoff into adjacent watersheds.

- Infiltration basins, designed to hold runoff and allow percolation into the ground. These basins need adequate storage volume and good permeability of the underlying soils.

- Porous pavement such as lattice pavers or porous asphalt. These may be used to replace large areas of paving that are not subject to heavy traffic.

- Placement of riprap dissipaters and filter blanket material at all storm drain discharge points to reduce flow velocities.

- Vegetative controls, which are plant materials which intercept rainfall and filter pollutants and absorb nutrients.

- Grass swales, which are shallow grass-covered channels used in place of a buried storm drain that filter pollutants.

BMPs would also include nonstructural methods, such as controlling litter and waste disposal practices.

State Water Resources Control Board Construction General Permit, 2009-0009-DWQ (General Construction Permit)

Under the SWRCB Construction General Permit Order 2009-0009, construction activities that disturb one or more acres of land that could affect hydrologic resources must comply with the requirements of this permit. Applicants for a construction permit would file a complete and accurate Notice of Intent with the SWRCB. Compliance requires conformance with applicable BMPs and development of a SWPPP. These prevention plans would be required to contain a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project.

Projects that would be less than one acre in size and not part of a larger common plan of development are not subject to the requirements of the General Construction Permit.

General Industrial Permit

Industrial facilities are subject to “Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities” (General Industrial Permit). The General Industrial Permit requires the implementation of storm water management measures and development of a SWPPP for operation of existing industrial facilities and proposed new industrial facilities.

5.7.2 Significance Determination Thresholds

Based on the City's significance thresholds, impacts related to hydrology/water quality would be significant if the CPU would:

1. Result in an increase in impervious surfaces and associated increased runoff, or result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes;

2. Result in modifications to the natural drainage system or affect the Otay or Tijuana river valley drainage basins;

3. Result in alterations to the course or flow of flood waters; or

4. Create discharges into surface or ground water, or result in increases in pollutant discharges including downstream sedimentation.

5.7.3 Issue 1: Runoff

Would the CPU result in an increase in impervious surfaces and associated increased runoff? Would the CPU result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

5.7.3.1 Impacts

a. Increase in Impervious Surfaces

Future development under the CPU would result in an increase in impervious surfaces within the CPU area. An increase in the amount of impervious surface area would potentially increase the amount and rate of runoff and result in an alteration to drainage patterns within the CPU area. As detailed below, all future projects would be required to design and build storm drain systems, including adequate on-site retention facilities to accommodate new development. Future projects also would conform to General Plan and CPU policies and would be required to comply with the City's Storm Water Regulations. The CPU contains goals and policies related to the provision of a reliable system of storm water facilities to serve the existing and future needs of the community. Specifically, the Public Facilities, Services, and Safety Element contains a goal assuring the development of adequate storm water infrastructure as a means to minimize urban runoff and pollution. Policies 6.3-1, 6.3-2, and 6.3-3 implement this goal through the requirement of future projects to use sustainable infrastructure design to capture and control runoff using Drainage Design Standards, encouraging the use of LID design to exceed regulations set forth in the Storm Water Standards, and improving surface and/or subsurface drainage facilities in conjunction with private development projects. Additionally, Policy 6.3-4 requires implementation of the City's Master Storm Water System Maintenance Program to ensure storm water conveyance facilities remain free

of invasive plants, sediments or other debris that would reduce their capacity. Policy 6.3-5 supports the goal of minimizing urban runoff by requiring new projects to coordinate with the City Engineer and Storm Water staff to monitor and improve storm water conveyance systems throughout the CPU area.

Policy 3.3-3 of the Mobility Element addresses urban runoff associated with streets. The policy requires the designation of areas within the right-of-way for LID storm water management facilities, such as bioswales, that allow runoff to infiltrate into the ground.

The Urban Design Element of the CPU supports the minimization of storm water runoff. Policy 4.9-5(b) encourages the use of trees with project proposals to slow storm water runoff. Likewise, the Conservation Element of the CPU contains the goal to implement urban runoff management techniques. Conservation Element Policies 8.4-1, 8.4-2, and 8.4-3 promote management of storm water starting at the earliest stages of the development process, and encourage the use of pervious materials in planting areas, driveways, parking areas, and streets.

In addition to the above-referenced policies, all development in the City would be subject to the regulations of the San Diego Municipal Code, which requires that the existing flows of a property proposed for development, be maintained to ensure that the existing structures and systems handling the flows are sufficient. Development that adheres to this basic objective of the existing drainage regulations would not be expected to result in an increase in runoff. Adherence to the Municipal Storm Water Permit likewise requires implementation of BMPs during construction of future projects. The requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which include installation of LID practices such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would maintain or improve surface runoff. Furthermore, future development that would adhere to these requirements would likely reduce the volume and rate of surface runoff compared to the existing condition rather than increase runoff.

The quantity of runoff reduction would depend on the actual design of a future project, including open space and pervious areas, and the manner of implementation of LID practices, adherence to regulations and conformance with General Plan, CPU policies, and existing City regulations. Because the amount and rate of runoff is dependent upon future project design, implementation of the CPU could potentially result in significant impacts from increased runoff from impervious surfaces.

b. Alteration to On- and Off-site Drainage

Under the CPU, existing watershed drainage courses within the CPU area would be retained; however, detention basins and increases in channel capacity would be required to accommodate future increases in flow within individual watersheds. Details of

potential modifications to the natural drainage system are discussed in Section 5.7.4, below.

As previously described and shown on Figure 5.7-2, there are five drainage areas in the Otay Mesa study area. Drainage and retention facilities would be constructed as part of future development or road improvements within all portions of the CPU area which drain to the Mexico border. However, because the construction of drainage facilities is dependent upon future project design, implementation of the CPU could result in significant impacts associated with alternations to on- and off-site drainage.

5.7.3.2 Significance of Impacts

Buildout in accordance with the CPU would result in an increase in impervious surfaces and associated increased runoff, and result in alterations to on- and off-site drainage. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts associated with runoff and alternations to on- and off-site drainage patterns.

5.7.3.3 Mitigation Framework

HYD/WQ-1: Prior to approval of development projects implemented under the CPU, the applicant shall demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate all practicable measures as further outlined below in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

a. San Diego RWQCB

- Comply with all NPDES permit(s) requirements, including the development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.

- If a future project includes in-water work, it shall require acquiring and adhering to a 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW).

- Comply with the San Diego RWQCB water quality objectives and bacteria TMDL.

b. City of San Diego

- To prevent flooding, future projects shall be designed to incorporate any applicable measures from the City of San Diego LDC. Flood control measures that shall be incorporated into future projects within a SFHA, or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC.

- In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13).

- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the Special Flood Hazard Area, the developer shall obtain a Conditional Letter of Map Revision from FEMA.

- Fill placed in the Special Flood Hazard Area for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials (ASTM) Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.

- The applicant shall denote on the improvement plans “Subject to Inundation” all areas lower than the base elevation plus two feet.

- If the structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, the applicant must obtain a Letter of Map Revision based on Fill (LOMR-F) prior to occupancy of the building. The developer or applicant shall provide all documentation, engineering

calculations, and fees required by FEMA to process and approve the LOMR-F.

- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:
  - Stream scour is minimized.
  - Erosion protection is provided.
  - Water flow velocities are maintained as specified by the City Engineer.
  - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.
  - Wildlife habitat and corridors are maintained.
  - Groundwater recharge capability is maintained or improved.
- Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:
  - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
  - The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.
  - Grading and filling are limited to the minim amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including

peak flow storage capacity, and wetlands hydrology is maintained.

- The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.

- There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.

5.7.3.4 Significance after Mitigation

Future development implemented in accordance with the CPU would be subject to the requirements of the Storm Water Standards Manual, which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework, which requires regulatory compliance as noted above, along with GP and CPU policy compliance for reducing storm water runoff, would ensure that potential impacts to downstream resources would be reduced to below a level of significance.

5.7.4 Issue 2: Natural Drainage System

What modifications to the natural drainage system would be required for implementation of the CPU? Would there be an effect on the Otay or Tijuana River Valley drainage basins with implementation of the CPU?

5.7.4.1 Impacts

Criteria in the City of San Diego's 2011 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to altered drainage patterns may result under the following conditions:

- Construction of impervious surfaces (generally one acre or more) adversely affects groundwater recharge capacity in areas utilizing well water;

- A substantial change to stream flow velocities or quantities; and

- Substantial changes in drainage patterns on downstream properties.

If these modifications occur there may be significant impacts on environmental resources such as biological communities and archaeological resources; and a

determination by a drainage study that the project would result in adverse impacts on downstream properties or environmental resources.

Most of the CPU area drains to the south across the border with Mexico and eventually into the Tijuana River. The far western part of the CPU area flows to the west through San Ysidro and then into the Tijuana River. A small portion flows north into the Otay River, which ultimately discharges into the San Diego Bay. Buildout in accordance with the CPU would result in modifications to the natural drainage system. The watersheds within the CPU area flow in every direction except east and flow into different watersheds with different constraints and impacts (see Appendix G-2). Therefore, each of the watersheds would require its own set of drainage facilities and improvements.

All future projects implemented in accordance with the CPU would require hydromodification management considerations and would be required to prepare project-level drainage studies to address and ensure compliance with the Storm Water Regulations.

The General Plan also requires the application of water quality protection measures to land development projects early in the process to minimize the disruption of natural water flows and the contamination of storm water runoff. Likewise, all future projects within the CPU area shall develop adequate drainage facilities and improvements to the satisfactory of the City Engineer.

Development pursuant to the CPU would have the potential to modify the natural drainage system. Therefore, drainage impacts within the CPU area watersheds would be potentially significant.

5.7.4.2 Significance of Impacts

Buildout in accordance with the CPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts to the natural drainage system.

5.7.4.3 Mitigation Framework

See **HYD/WQ-1** in Section 5.7.3.3, Mitigation Framework, above.

5.7.4.4 Significance after Mitigation

Future development implemented in accordance with the CPU would be subject to the requirements of the Storm Water Standards which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework which requires regulatory compliance as noted above would ensure that the GP and CPU polices for reducing storm water run-off

and potential impacts to natural drainage systems and associated downstream resources would be reduced to below a level of significance.

5.7.5 Issue 3: Flow Alteration

Would the CPU result in alterations to the course or flow of flood waters?

5.7.5.1 Impacts

Criteria in the City of San Diego's 2011 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to altered flow patterns may result under the following conditions:

- A project-related increase in runoff from the site would increase on- or off-site flooding hazards (pursuant to mapped FEMA floodplains and requirements in City Council Policy 600-14, which restrict development within SFHAs).

As shown in Figure 5.7-1, a FEMA 100-year floodplain exists in the northwestern portion of the CPU area near the Otay River. The Otay Mesa Creek, in the East Watershed, flows from north to south along La Media Road and crosses the border into Mexico just north of the General Abelardo L. Rodriguez International Airport. Though not designated as a FEMA 100-year floodplain, this area is subject to flooding.

Future development along the floodplain would have the potential to increase flooding on- or off-site. All future projects located within the 100-year flood hazard area along Otay Creek, as identified in the CPU drainage study, would be subject to the CPIOZ, which would ensure ~~discretionary~~ review of all future development within this area. Pursuant to Municipal Code Section 143.0145, any future development project must be studied to determine the effects to base flood elevations and ensure they would not result in flooding, erosion, or sedimentation impacts on or off-site. Also, all future projects (both ministerial and discretionary) developed in accordance with the CPU would be required to be designed satisfactory to the City Engineer to contain the 100-year flow and reduce or eliminate flooding impacts to adjacent properties.

However, because project-level detail is unavailable at the program-level, projects under the CPU would have the potential to alter the course or flow of flood waters.

5.7.5.2 Significance of Impacts

Future development within the CPU area would potentially impact the existing course and flow of flood waters, resulting in potentially significant impacts.

5.7.5.3 Mitigation Framework

See **HYD/WQ-1** in Section 5.7.3.3, Mitigation Framework, above.

5.7.5.4 Significance after Mitigation

Although exact flooding impacts from each future project implemented in accordance with the CPU are unknown at this time, future projects which would alter the course and flow of flood waters would be reviewed for compliance with the City's Storm Water Standards and all applicable plans and polices, thereby assuring that the design and function of each project would not result in impacts to downstream drainage patterns. In addition, implementation of Mitigation Framework HYD/WQ-1 would reduce potential impacts to below a level of significance.

5.7.6 Issue 4: Water Quality

Would the CPU create discharges into surface or ground water, or any alteration of surface or ground water quality, including but not limited to temperature, dissolved oxygen or turbidity? Would there be increases in pollutant discharges including downstream sedimentation?

5.7.6.1 Impacts

Criteria in the City of San Diego's 2011 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to erosion and sedimentation may result if the CPU would:

- Grade, clear, or grub more than one acre of land, especially into slopes over a 25 percent grade and drain into a sensitive water body or stream.
- Result in non-compliance with the City's Water Quality Standards manual and BMP requirements.

Future projects constructed during buildout of the CPU could result in impacts to water quality, including discharges to surface or groundwater. Although specific locations for future projects have not been identified, the construction of such facilities and, to a lesser degree, the operation of these facilities, could impact water quality. Grading and exposed soil could result in sedimentation.

As previously discussed in relation to drainage, the volume of runoff within the CPU area is not expected to increase as a result of future development and may even be slightly reduced through the required implementation of LID design. Furthermore, the pollutants that are listed for water bodies such as San Diego Bay and the Tijuana River would likely be reduced with implementation of storm water BMPs, as existing development in the CPU area may have been constructed before the storm water regulations were adopted. LID practices not only reduce pollution by reducing runoff volume, but also can provide treatment by filtration and microbial action for runoff that would ultimately be discharged through underdrains. Existing development within the CPU area typically does not

include any other structural practices to prevent the transport of pollutants off-site, such as trash traps or manufactured filtration devices. Currently, only specific industries subject to the General Industrial Permit may have implemented some storm water management practices to control pollution.

Under current storm water regulations in the City, all projects requiring discretionary approvals are subject to certain minimum storm water requirements. Types of storm water BMPs required for new development include: site design, source control, and treatment control practices, many of which overlap with LID practices. Standard plan check review of future ministerial projects would occur prior to issuance of building permits. Before building permits are issued, documentation of specific storm water BMPs and LID practices are required. The storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters.

The General Plan identifies specific policies to limit pollutant discharge to receiving waters and the discharge of identified pollutants to an already impaired water body (see Table 5.7-2). For example, Policy PF-G.3 states, “Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.”

Pursuant to the CPU, future use of undeveloped land would consist of residential, industrial, and commercial uses. In addition to these uses the CPU also includes parks, schools, roads, and other public infrastructure. Potential pollutants vary by type of land use and are discussed below.

a. Residential

For residential development, the potential pollutants of concern are sediments, nutrients, trash and debris, oxygen demanding substances, oil and grease, pesticides, and bacteria and viruses.

b. Commercial

For commercial developments, the anticipated pollutants of concern are trash and debris, and oil and grease. The potential pollutants of concern include sediments, nutrients, organic compounds, oxygen demanding substances, pesticides, and bacteria and viruses.

c. Industrial

Industrial operations are known to be a source of heavy metals, oily wastes, and various other substances dependent on the specific industrial operation. Based on Standard Industrial Code and storm water exposure, industrial facilities would be subject to the General Industrial Storm Water Permit and are required to prepare a SWPPP.

d. Parks, Schools, Roads, and Other Public Infrastructure

Proposed parks, schools, roads, and other public infrastructure within the CPU area would contribute any of the pollutants identified within the residential, commercial, and industrial land uses. Future development of these facilities would be required to implement appropriate BMPs as identified above.

5.7.6.2 Significance of Impacts

Adherence to federal, state, and local regulations, would serve to reduce significant impacts to a degree, but cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Therefore, impacts associated with water quality would be significant at the program-level.

5.7.6.3 Mitigation Framework

The discussion below summarizes general measures that shall be implemented to preclude impacts. These measures shall be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions; as well as changes to local, state, and federal laws.

HYD/WQ-2:

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

Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;

- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego Regional Water Quality Control Board and Municipal Code Compliance

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Stormwater Regulations.
- In accordance with the City of San Diego Stormwater Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

5.7.6.4 Significance after Mitigation

Future development implemented in accordance with the CPU would be subject to the requirements of the Storm Water Standards which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework detailed in HYD/WQ-2 which requires regulatory compliance as noted above would ensure that the GP and CPU polices for reducing storm water run-off and potential impacts related to discharges into surface or ground water, alterations to surface or groundwater, increases in pollutant discharges (erosion) and downstream sedimentation would be reduced to below a level of significance.

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5.8 Geology/Soils

The geology and soils conditions, analysis of impacts, and mitigation framework are based on the Update Geotechnical Report completed by Geocon, Inc. (2012). This report is included as Appendix H.

5.8.1 Existing Conditions

5.8.1.1 Soil and Geologic Conditions

The CPU area is underlain by three surficial soil deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium (unmapped), and alluvium. The geologic formations include Pleistocene Very Old Paralic Deposits (formerly the Lindavista Formation), Upper Pliocene San Diego Formation, and Pliocene Otay Formation. These soils and geologic formations are broken into compressible and expansive categories as shown on Figure 5.8-1 and described below.

a. Undocumented Fill (Unmapped)

During field reconnaissance, undocumented fill was observed in the central portion of the CPU area south of SR-905. Undocumented fill was interpreted as loose soil with concrete debris, trash, and miscellaneous materials. The fills appear to have been placed for a variety of purposes such as access barriers and material disposal areas for household trash and vegetation. Minor undocumented fills also were observed primarily as a result of agricultural operations and possibly for control of surface water along the proposed extension of Airway Road. Artificial fill marked by signage to contain hazardous materials was observed on the west side of Cactus Road, south of SR-905 (Geocon, Inc. 2012).

Compacted fill soils were identified within the CPU area and were likely placed to construct facilities such as water reservoirs, transmission towers, associated roads, or runways on Brown Field. However, no engineer's record of compaction for these fill soils was identified, and as a consequence, these fills are considered undocumented until the appropriate records are provided.

Undocumented fills are unsuitable for support of structural fill or settlement-sensitive structures. Where placed on slopes, these undocumented fills are subject to downslope movement (creep, sliding or shallow debris flows). Undocumented fill requires removal and replacement by compacted fill. The undocumented fill soil would be suitable for reuse as compacted fill provided deleterious material including construction debris, vegetation, and trash is removed.

b. Topsoil and Slopewash (Unmapped)

Topsoil typically blankets the level portions of the CPU area and consists of brown sandy clay to sandy silt. Topsoil is estimated to be approximately 3 feet thick, but localized areas with greater thicknesses may exist. Slopewash is present on sloping areas of the CPU area and consists of light brown to gray sandy clay to sandy silt. It is typically a minimum of 3 feet thick, but can locally be significantly thicker. Topsoil and slopewash materials are soft, loose, and/or expansive in their present condition and require removal and recompaction in areas to receive additional fill and/or support for structures and improvements.

c. Alluvium (Qal)

Alluvial soils are mapped at the floor of canyon drainages. The alluvial soils generally consist of soft sandy to silty clay and interfingers or grades with topsoil and slopewash along the outer edges of canyons. Depth of alluvial materials is anticipated to range from approximately 5 feet in smaller drainages to in excess of 20 feet in Spring Canyon and other major drainages. The alluvial soils are typically compressible, medium to highly expansive, and require removal and recompaction to provide suitable support for fill placement and/or structural support.

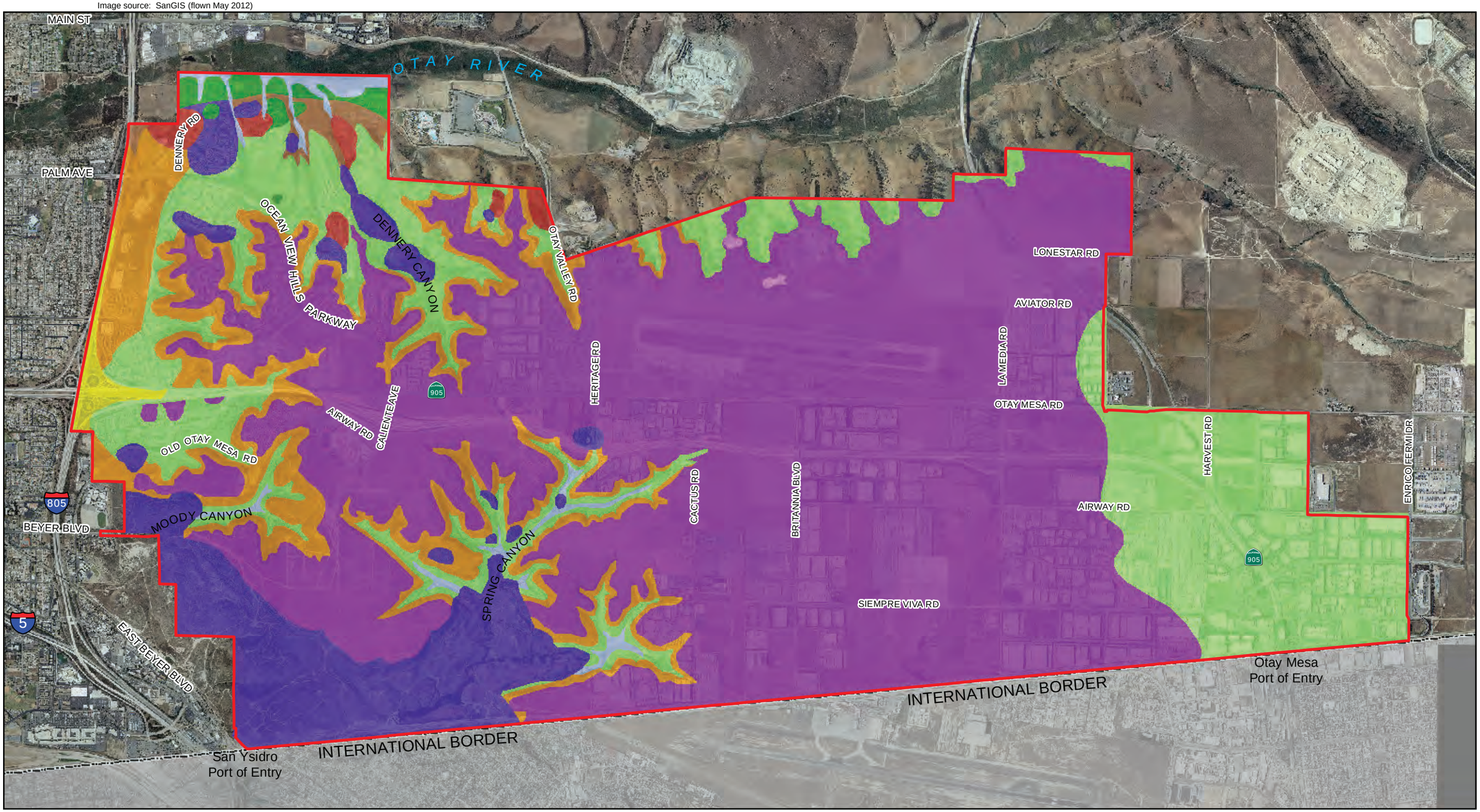
d. Very Old Paralic Deposits (Qvop)

Pleistocene-age Very Old Paralic Deposits (formerly Lindavista Formation) are present across the CPU area. The Very Old Paralic Deposits in the CPU area consist of clay (mudstone) overlying sandstone which grades to a gravel and cobble conglomerate. Thickness of the mudstone unit ranges from approximately 4 feet to 20 feet. Thickness of the sandstone and conglomerate unit is generally less than 30 feet. Cobbles of the conglomerate are commonly exposed on slopes. Geotechnical tests previously performed in the CPU area indicate that the mudstone is highly expansive. The presence of these highly expansive materials, especially if near finished proposed grades, requires special foundations for buildings and mitigation to prevent excessive soil heave that can damage surface improvements such as sidewalks and pavements.

e. San Diego Formation (Tsd)

The sandstone member of the Pliocene-age San Diego Formation is exposed on slopes of drainages primarily in the western and northwestern portion of the CPU area. The San Diego Formation consists of dense, yellow-brown, fine- to medium-grained, poorly indurated micaceous sandstone. It is readily eroded and forms uniform slopes along the sides of narrow canyons in the CPU area. The San Diego Formation is typically massive, and is considered to be flat lying, which is a favorable geologic structure for gross stability. Materials derived from this formation are low expansive and have relatively good shear strength characteristics and, as such, can provide good capping materials

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Geological Formation

- Qal
- Qls
- Qls?
- Qpf
- Qt
- Qudf
- Qvop
- Tmv
- To
- Tsd

0 Feet 2,500

FIGURE 5.8-1

Geologic Map

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for pads and higher strength soils for construction of fill slopes. Portions of the San Diego Formation are cohesionless and erode readily.

f. Otay Formation (To)

Pliocene-age Otay Formation underlies the San Diego Formation. It is older than the San Diego Formation and is generally distinguished from the San Diego Formation by an increase in clay content within the deposit and isolated bentonite claystone beds. The bentonite beds are waxy and composed almost entirely of montmorillinitic clay. The bentonitic materials are very highly expansive, have very low shear strength, and are considered to be the main cause of the large landslide complex (San Ysidro Landslide) along the western edge of the CPU area. The Otay Formation consists of a dense to very dense upper sandstone unit that has a light gray color. A coarser-grained grit stone member underlies the sandstone at depth. The Otay Formation is generally flat-lying or nearly horizontally bedded, which is favorable for overall stability.

g. Groundwater

No indications of natural springs or seeps were observed during the field reconnaissance or encountered in previous geotechnical subsurface studies conducted by Geocon within the CPU area. Near surface groundwater (less than 20 feet deep) also is unlikely to occur in geologic formations within the CPU area. Subsurface water may be present at depth in alluvial soils deposited in drainage channels. However, it is anticipated that the subsurface water is relatively shallow in drainages and has intermittent response to seasonal rainfalls. Ponded water was observed west of Heritage Road and south of Otay Mesa Road and is believed to be impounded surface runoff.

h. Erosive Soils

Soils within the CPU area have moderate to severe erosion susceptibility, with the majority of the soil types exhibiting severe erosion characteristics (United States Department of Agriculture 1973).

5.8.1.2 Geologic Hazards

a. Landslides (Qls)

A complex of deep-seated landslides known as the San Ysidro Landslide is present in the western and southern edges of the CPU area (Figure 5.8-2). At this location there are a series of landslides that have increased in size and complexity with refined mapping. Apparent landslide debris was found to at least 100 feet below the ground surface, placing the bottom of the landslides below present sea level and indicating an ancient and complex history of movement.

Numerous smaller landslides are present on steep drainage slopes. These landslides likely vary in depth from less than 10 feet to more than 80 feet. The landslides are expected to have an incoherent broken internal structure and are susceptible to continued movement, particularly where destabilized by undercutting, placement of additional loads (fill), or introduction of soil moisture.

b. Faulting

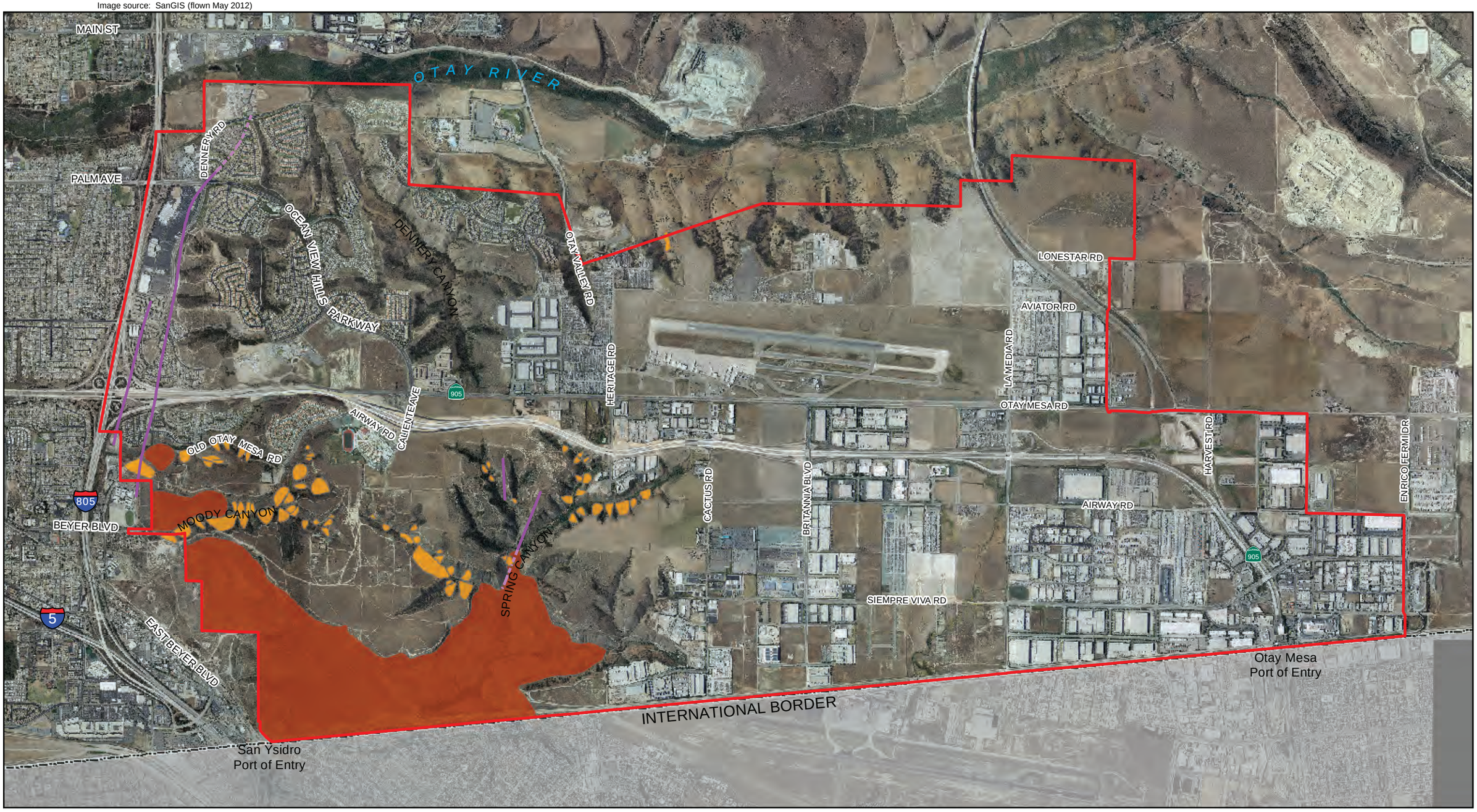
Review of published geologic literature indicates that the CPU area is located on the east margin of the La Nación Fault Zone (LNFZ). The LNFZ is characterized by north-trending faults. Figure 5.8-2 shows the geologic hazards in the CPU area. Figure 5.8-3 shows the CPU area from the City of San Diego Seismic Safety Study. Several faults traverse the CPU area including discontinuous faults that cross areas in the headwaters of Spring Canyon in the southwestern portion of the CPU area. The presence and existence of faults in the CPU area and an intersecting northwest-trending fault zone (not shown) named the San Ysidro Fault has been refined through published literature and specific geotechnical investigations. However, the presence of faults forming the San Ysidro Fault Zone is unclear. The bulk of the evidence points to landslide-scarps, rather than fault-scarps for this zone. Fault strands of the north-striking LNFZ are considered to be potentially active.

The nearest known active fault is the Rose Canyon Fault Zone, located approximately 9.4 miles to the west. The Rose Canyon Fault is the dominant source of potential ground motion at the site. The CPU area would be subjected to moderate to severe ground shaking in the event of a major earthquake on any Rose Canyon Fault or other faults in southern California. With respect to seismic shaking, the CPU area is considered comparable to the surrounding developed area.

c. Liquefaction Potential

Liquefaction typically occurs in a zone with seismic activity, where soils are relatively cohesionless, groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. If all four criteria are met, a seismic event could result in a rapid pore-water pressure increase from earthquake-generated ground accelerations thereby resulting in soil liquefaction. The potential for liquefaction and seismically induced settlement occurring for the mesa top areas is considered very low due to the very dense cemented condition of the geologic formations and lack of groundwater.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Mapped Landslide Zone

Suspected Landslide Zone

Fault Line

Buried Fault Line

0 Feet 2,500

FIGURE 5.8-2

Geologic Hazards

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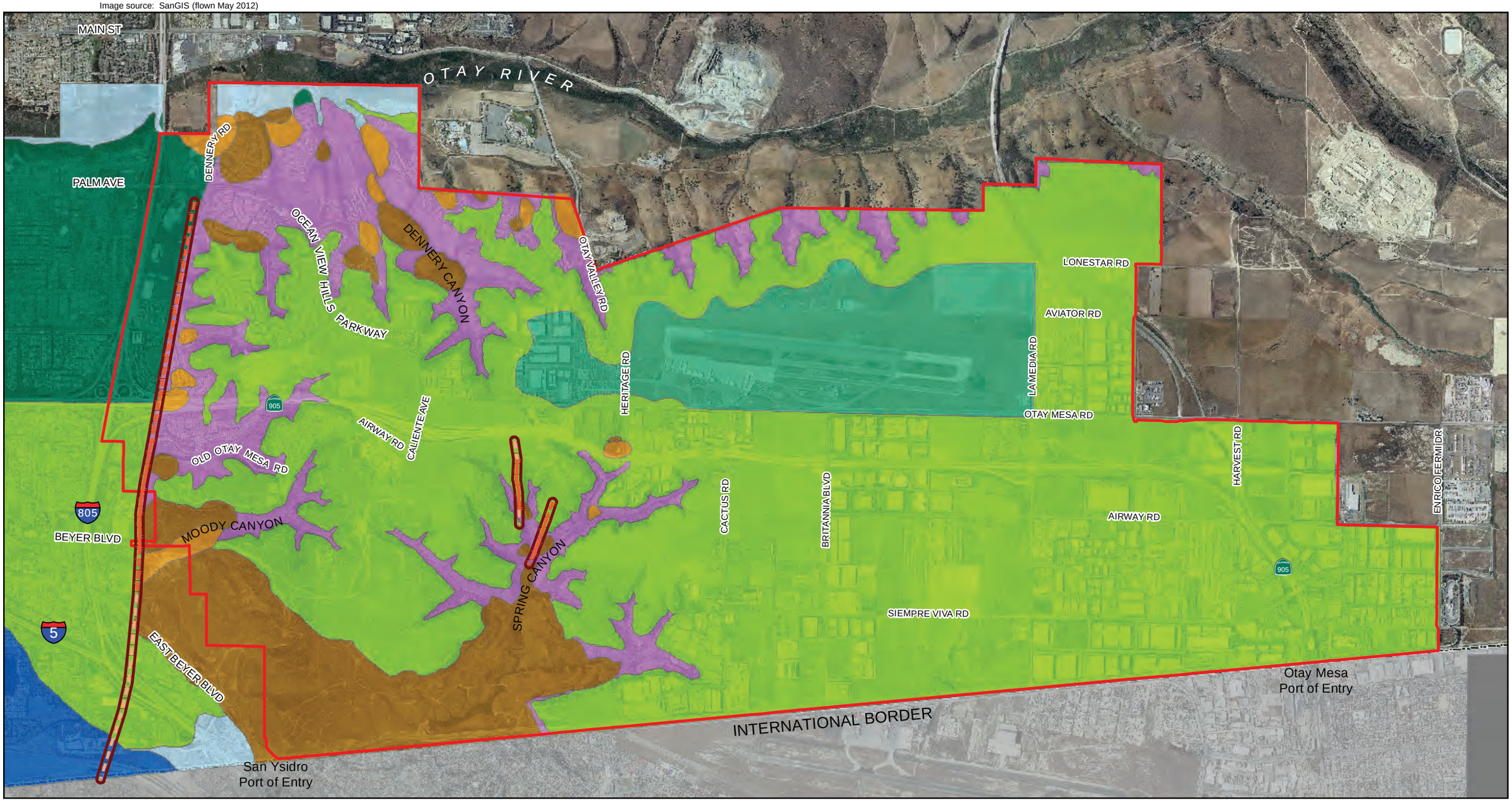
Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Seismic Safety Data

Land Slides

- Confirmed, known, or highly suspected
- Possible or conjectured

Liquifaction Zones

- High Potential-shallow groundwater major drainages, hydraulic fills
- Low Potential-fluctuating groundwater minor drainages, hydraulic fills

Other Conditions

- Level mesas-underlain by terrace deposits and bedrock, nominal risk
- Level or sloping terrain, unfavorable geologic structure, low to moderate risk
- Other level areas; gently sloping to steep terrain, favorable geologic structure low risk

Slide Prone Formations

- Otay, Sweetwater and others

Fault Zones

- Potentially Active, Inactive, Presumed Inactive, or Activity Unknown

Faults

- Defined Fault
- Inferred Fault
- Concealed Zone

0 Feet 2,500

FIGURE 5.8-3

City of San Diego Seismic Safety Hazards

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Potentially liquefiable deposits exist in deeper alluvium areas such as the Otay River Valley or the Tijuana River Valley, respectively, to the north and south (with the exception of a narrow area in the extreme northwestern quadrant) outside of the CPU area. Subsurface exploration and laboratory testing would be necessary at the future project-level to evaluate liquefaction potential of the alluvium if future development extends into those areas or any other areas where deep alluvial deposits are encountered.

d. Tsunamis and Seiches

The CPU area is not located near the ocean or downstream of any large bodies of water. Therefore, the risk associated with inundation by tsunamis or seiches is low.

e. Subsidence

Based on the subsurface soil conditions encountered during the field investigation and the lack of groundwater extraction, the risk associated with ground subsidence hazard is low throughout the CPU area.

5.8.1.3 Regulatory Setting

a. Earthquake Fault Zoning Act (Alquist-Priolo Act)

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the act, the state geologist has established regulatory zones (known as earthquake fault zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. A detailed geologic investigation must be prepared prior to receiving a permit in an area extending between 200 and 500 feet on both sides of known potentially and recently active earthquake fault zone traces.

b. California Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act was passed by the state in 1990 and contains seismic safety standards. The act includes non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. There are no seismic hazard maps that have been completed by the state for the County of San Diego.

c. California Building Code/California Residential Code

Slope instability or erosion problems in the City are primarily regulated through the California Building Code (CBC) and the City's Grading Regulations contained in the Land Development Code. The CBC requires special foundation engineering and investigation of soils on proposed development sites located in geologic hazard areas; the results of which would be disclosed in a report prepared in accordance with the

City's Geotehncial Report Guidelines in the Land Development Manual. The report must demonstrate either that the hazard presented by the project would be eliminated or that there is no danger for the intended use. The CBC also contains design and construction regulations pertaining to seismic safety for buildings. These regulations cover issues such as ground motions, soil classifications, redundancy, drift, and deformation compatibility.

The CBC is part of the CCR, Title 24 Part 2. The California Residential Code (CRC) will become part of the CCR, Title 24 Part 2.5. The CBC and CRC are based on the 2006 International Building Code and International Residential Code. The CBC and CRC are a compilation of three types of building standards from three different origins:

- Building standards that have been adopted by state agencies without change from building standards contained in national model codes.
- Building standards that have been adopted and adapted from the national model code standards to meet California conditions.
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the model codes that have been adopted to address particular California concerns.

The CBC is updated periodically. On January 1, 2010, the 2010 CBC and CRC became effective. The CBC and CRC contain seismic safety standards outlining design and construction requirements. Development projects must show compliance with the CBC and/or CRC through the development review process. Building permits are submitted and reviewed for compliance prior to obtaining necessary construction and building permits.

d. City of San Diego Seismic Safety Study

The City of San Diego Seismic Safety Study (SDSSS) is a series of maps indicating likely geologic hazards throughout the City. The maps do not provide site-specific information; they are used as a guide to determine relative risk. The SDSSS identifies areas prone to liquefaction and earthquake-induced landslides as a Zones of Required Investigation, which require a report of the geotechnical condition prior to obtaining a permit (City of San Diego 2009). The level of geotechnical analysis required for project review is dependent on the following:

- The type of permit being sought (e.g., land planning, land development, and/or building);
- Geological Hazard Category;
- The building type/land use group; and
- Relative Risk.

e. City of San Diego General Plan Policies

The City's General Plan presents goals and policies for geologic and soil safety in the Public Facilities, Services, and Safety Element. Relevant excerpts from this element are included in Table 5.8-1 below.

TABLE 5.8-1
PUBLIC FACILITIES, SERVICES, AND SAFETY ELEMENT POLICIES RELATING TO GEOLOGY AND SOILS

Policy	Description
PF-Q.1	Protect public health and safety through the application of effective seismic, geologic and structural considerations. a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act document accompanying a discretionary action. b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses. c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected. d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City. e. Coordinate with other jurisdictions to establish and maintain a geologic "data bank" for the San Diego area. f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability. g. Adhere to state laws pertaining to seismic and geologic hazards.
PF-Q.2	Maintain or improve integrity of structures to protect residents and preserve communities. a. Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural appendages, special geologic and soils hazards, and the socio-economic consequences of the attendant relocation and housing programs. b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements. c. Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.

SOURCE: City of San Diego General Plan Public Facilities Services and Safety Element 2008.

5.8.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, impacts related to geology and soils would be significant if the CPU would:

1. Expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards; or

2. Increase the potential for erosion of soils on- or off-site.

5.8.3 Issue 1: Geologic Hazards

Would the CPU expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?

5.8.3.1 Impacts

The western and southern edges of the CPU area are within a moderate to high geotechnical and relative risk area (General Plan Figure PF-9). This area includes a complex of deep-seated landslides and several discontinuous faults. Therefore, the CPU contains the following policy relative to geologic hazards:

Public Facilities, Services and Safety Element Policy 6.10-1 would allow clustering of development in the southwestern area to mitigate and avoid risks posed by seismic conditions and landslides.

Unstable geologic conditions found throughout the CPU area would expose people or property to hazards if they were not properly remediated. Soil and geologic conditions that would impact future development in the CPU area include:

- San Ysidro Landslide along the south and west side of Otay Mesa;
- Suspected landslides along canyon drainages;
- La Nación Fault Zone;
- Compressible surficial soils (undocumented fill, alluvium, colluvium and topsoil); and
- Highly expansive clays in the upper portion of the Lindavista Formation.

Potential impacts associated with each of these issues are described below. Groundwater, tsunamis, seiches and subsidence were found not to pose substantial geological constraints to future development within the CPU area.

a. San Ysidro Landslide

Deep landslides (Qls) in the west and southwest portion of the CPU area have been confirmed during the geologic reconnaissance. The landslides are susceptible to continued movement, particularly where destabilized by undercutting, placement of additional loads (fill), or introduction of soil moisture from precipitation or irrigation. The San Ysidro landslide area contains landslide debris in excess of 100 feet deep and is a complex landslide with not only a deep basal failure plane but numerous secondary failures as evidenced by the "hummocky" (ridged) topography. The landslide is extremely large in area (approximately 740 acres), and the toe of the landslide extends westerly to I-5. Given the large area and estimated depth of the landslides, stabilization is essentially infeasible, due to the extensive amount of grading and impacts to environmentally sensitive habitat within the MHPA that would be necessary. Thus, structural/improvement setbacks are recommended where engineered stabilization would not be practical.

The San Ysidro landslide area is designated as Open Space under the CPU. However, Beyer Boulevard is proposed to be extended through the open space from the west end of the CPU area to the mesa top to create a westerly connection with San Ysidro and a direct link to Interstate 5. Infrastructure would likely include underground utilities, roadways, and bridges. The proposed alignment of Beyer Boulevard could, therefore, expose people or property to geologic hazards.

b. Steep Hillside Landslides

Other landslides are likely to be present on steep hillsides of natural drainages. If present, their depths are generally considered to range from 5 feet to 15 feet; however, larger slides could extend to depths exceeding 50 feet. Additionally, although landslide areas are present within the CPU area, the geotechnical report found no evidence of potential rockfall hazards, and no rock stabilization or blasting would be required.

c. Faults

Southern California is one of the most seismically active regions in the United States. The source of most earthquakes felt in the San Diego region is from Imperial Valley and offshore fault systems. The San Andreas Fault is 100 miles east of the CPU area but poses a potential hazard.

The CPU is within a moderate to high geologic risk area. Faults within the immediate CPU area are generally considered to comprise the La Nación Fault Zone. Faults in this zone are considered to be potentially active and would subject the CPU area to moderate to severe ground shaking.

d. Compressible Soils

Portions of the CPU area are underlain by undocumented fill, colluvium/topsoil, and alluvium. These soils are typically loose, dry, and contain rubble, and are unsuitable for support of settlement-sensitive structures. These types of compressible soils on slopes are subject to downslope movement (creep, sliding, or shallow debris flows). For future projects underlain by compressible soils, removal and replacement by compacted fill would be required.

e. Expansive Soils

The clay mudstone strata within the Very Old Paralic Deposits exhibits high to very high expansion potential. The mudstone unit occurs near existing grade over the majority of the CPU area. The presence of the highly expansive soil near grade would be addressed at the project-level for future development within the CPU area.

5.8.3.2 Significance of Impacts

The CPU area contains geologic conditions which would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils represent a potentially significant impact for future development.

5.8.3.3 Mitigation Framework

GEO-1: Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

More specifically, compressible soils impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Future development shall also be required to clean up deleterious material and properly moisture, condition, and compact the soil in order to provide suitable foundation support.

Regarding impacts related to expansive soils, future development shall be required to implement typical remediation measures, which shall include placing a minimum 5-foot cap of low expansive (Expansion Index [EI] of 50 or less) over the clays; or design of foundations and surface improvements to account for expansive soil movement.

5.8.3.4 Significance After Mitigation

Future development implemented in accordance with the CPU would be required to comply with the recommendations included in a geotechnical report prepared in accordance with City Geotechnical Report Guidelines, the CBC, and the LDC, and be designed satisfactory to the City Engineer. Implementation of the GP and CPU policies, compliance with established development and engineering standards, as well as strict adherence to the Mitigation Framework detailed in GEO-1, which requires regulatory compliance as noted above, would ensure that impacts related to geological hazards would be reduced to below a level of significance.

5.8.4 Issue 2: Erosion

Would the land use and circulation modifications proposed in the CPU increase the potential for erosion of soils on- or off-site?

5.8.4.1 Impacts

Implementation of the CPU would have the potential to result in substantial short-term soil erosion or loss of topsoil. The San Diego formation is exposed on slopes of drainages in the western and northwestern regions of the CPU area. This formation is composed of sandstone material and erodes readily due to its cohesionless nature. Erosion on drainage slopes in Tijuana River Valley and the Otay River Valley could also cause downstream sedimentation impacts. Other related impacts resulting from substantial short-term erosion or loss of topsoil include topography changes and the creation of impervious surfaces within the CPU area.

Additionally, grading activities associated with future development would disrupt soil profiles, thereby resulting in an increased exposure of soils to wind and rain, which are erosive forces. Landscape planting and maintenance implemented soon after construction of slopes would minimize potential erosion associated with future development.

5.8.4.2 Significance of Impacts

Based on the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPU area, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys.

5.8.4.3 Mitigation Framework

GEO-2: As part of the future development permitting process, the City shall require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPU shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer.

Submittal, review and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPU to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the following measures to control erosion during and after grading or construction:

- Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;
- Short-term measures, such as sandbag placement and temporary detention basins;
- Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and
- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved SWPPP that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer. Measures designed to reduce erosion at the project-level shall include the following:

- Control erosion by minimizing the area of slope disturbance and coordinate the timing of grading, resurfacing, and landscaping where disturbance does occur.

- On sites for industrial activities require reclamation plans that control erosion, where feasible, in accordance with the LDC.

- Control erosion caused by storm runoff and other water sources.

- Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, insure public safety, provide aesthetic enjoyment, and protect biological resources.

- Replant with native, drought-resistant plants to restore natural appearance and prevent erosion.

- Practice erosion control techniques when grading or preparing building sites.

- Utilize ground cover vegetation when landscaping a development in a drainage area to help control runoff.

- Incorporate sedimentation ponds as part of any flood control or runoff control facility.

- During construction, take measures to control runoff from construction sites. Filter fabric fences, heavy plastic earth covers, gravel berms, or lines of straw bales are a few of the techniques to consider.

- Phase grading so that prompt revegetation or construction can control erosion. Only disturb those areas that will later be resurfaced, landscaped, or built on. Resurface parking lots and roadways as soon as possible, without waiting until completion of construction.

- Promptly revegetate graded slopes with groundcover or a combination of groundcover, shrubs, and trees. Hydroseeding may substitute for container plantings. Groundcovers shall have moderate to high erosion control qualities.

- Where necessary, design drainage facilities to ensure adequate protection for the community while minimizing erosion and other adverse effects of storm runoff to the natural topography and open space areas.

- Ensure that the timing and method of slope preparation protects natural areas from disturbance due to erosion or trampling. The final surface shall be compacted and spillovers into natural areas shall be avoided.

- Plant and maintain natural groundcover on all created slopes.

When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official.

In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site.

Section 145.1803 of the San Diego Municipal Code discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS (City of San Diego 2009).

5.8.4.4 Significance After Mitigation

Future development implemented in accordance with the CPU would be required to comply with the recommendations included in a geotechnical report prepared in accordance with City Geotechnical Report Guidelines, the CBC, the LDC and be designed satisfactory to the City Engineer. Implementation of the GP and CPU policies, compliance with established development and engineering standards, as well as strict adherence to the Mitigation Framework detailed in GEO-2, which requires regulatory compliance as noted above, would ensure that impacts related to an increase in the potential for erosion of soil, on or off-site, would be reduced to below a level of significance.

5.9 Energy Conservation

Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy use and conservation as it is applicable to the proposed project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of energy caused by a project, along with a description of feasible mitigation measures.

The analysis of energy conservation consists of a summary of the energy regulatory framework, the existing conditions within the CPU area, a discussion of the CPU's potential impacts on energy resources, and identification of the CPU design features/policy framework or mitigation measures that may reduce energy consumption. This section evaluates potential impacts to energy conservation in accordance with Appendix F of the CEQA Guidelines and federal, state, and regional regulations.

5.9.1 Existing Conditions

5.9.1.1 San Diego Gas and Electric

San Diego Gas and Electric (SDG&E) is the owner and operator of natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities' customers have safe and reliable utility service at reasonable rates and sets the gas and electricity rates for SDG&E. The energy needs of future projects within the CPU area would be supplied through the various combinations of energy resources available within the CPU area, and involving the anticipated future energy resource use patterns discussed in this section.

Table 5.9-1 lists SDG&E's current energy sources. As shown, SDG&E uses biomass, geothermal, hydroelectric, solar, and wind sources and obtained 10 percent of its energy from renewable resources in 2009. As directed by the California Renewables Portfolio Standard in Senate Bill 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33 percent renewable energy mix by 2020. Currently, nearly 11 percent of SDG&E's renewables procurement is from resources located in San Diego County. The remainder is from renewable energy sources located in Riverside, Orange, and Kern counties (SDG&E 2010a).

TABLE 5.9-1
SDG&E POWER CONTENT LABEL

Energy Source	SDG&E 2009 Power Mix* (actual)
Renewables	10%
Biomass and waste	3%
Geothermal	<1
Small hydroelectric	<1%
Solar	<1%
Wind	7%
Coal	7%
Large Hydroelectric	3%
Natural Gas	62%
Nuclear	18%
TOTAL	100%

SOURCE: SDG&E October 2010b.
*86 percent of SDG&E 2009 power mix is specifically purchased from individual suppliers; 10 percent of SDG&E 2009 power mix is purchased from individual renewable suppliers.

There are two major electricity generating power plants in San Diego County: the Encina Power Plant and the San Onofre Nuclear Generating Station. The San Onofre Station's two reactors have both been deactivated since January 2012 On June 7, 2013 Southern California Edison (SCE) announced that it will permanently retire Units 2 and 3 of its San Onofre Nuclear Generating Station. SCE concluded that continuing uncertainty about when or if San Onofre Unit 2 might return to service was not good for customers, investors, or the need to plan for the region's long-term electricity needs. There are also a number of smaller electricity generating plants in the county that are used as backup during times of peak power demand. These in-region assets are currently capable of generating approximately 2,360 megawatts (MW) of electricity, about 55 percent of the region's summer peak demand. However, San Diego's older in-region resources typically run at partial capacity (1,628 MW) due to air quality, high fuel cost, and other reasons.

Power generation and power use are not linked geographically. Electricity generated within the San Diego region is not dedicated to users in the SDG&E service area. Instead, electricity generated in the county is fed into the statewide utility grid and made generally available to users statewide. SDG&E purchases electricity from this statewide grid, through various long-term contracts.

Natural gas is also imported into southern California and originates from any of a series of major supply basins located from Canada to Texas. Gas is pumped out and shipped to receipt points that connect with major interstate gas pipelines. The Wheeler receipt point, located near Bakersfield, California, is where SDG&E receives deliveries of Canadian natural gas to be received into the Southern California Gas (SoCalGas) system. SDG&E currently purchases nearly 80 percent of its electricity and natural gas needs from out-of-region energy sources.

There is an existing SDG&E substation located south of SR-905 near the western boundary of the CPU area.

5.9.1.2 Regulatory Setting

The following regulations and guidelines provide the framework for energy conservation. According to the majority of these programs and their requirements, the increased and growing demands for non-renewable energy supplies are best addressed through conservation.

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation (DOT), the U.S. Department of Energy (DOE), and the U.S. EPA are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements.

On the state level, the CPUC and California Energy Commission (CEC) are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, has permitting authority, and adopts and enforces appliance and building energy efficiency standards.

a. Federal

Federal Energy Policy and Conservation Act and Amendments

Minimum standards of energy efficiency for many major appliances were established by the U.S. Congress in the federal Energy Policy and Conservation Act (EPCA) of 1975, and have been subsequently amended by succeeding energy legislation, including the federal Energy Policy Act of 2005. The DOE is required to set appliance efficiency standards at levels that achieve the maximum improvement in energy efficiency that is technologically feasible and economically justified.

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standard determines the fuel efficiency of certain vehicle classes in the United States. In 2007, as part of the Energy and Security Act of 2007, CAFE standards were increased for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, President Obama announced further plans to increase CAFE standards to require light duty vehicles to meet an average fuel economy of

35.5 mpg by 2016. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 established new standards for a few equipment types not already subjected to a standard, and updated some existing standards. The Energy Independence and Security Act includes new standards for general service lighting, which will be deployed in two phases. First, by 2012–2014 (phased over several years), common light bulbs will be required to use about 20–30 percent less energy than present incandescent bulbs. Second, by 2020, light bulbs must consume 60 percent less energy than today's bulb; this requirement will effectively phase out the incandescent light bulb.

b. State

State Standards Addressing Vehicular Emissions

California Assembly Bill 1493 (Pavley), enacted on July 22, 2002, directed CARB to adopt regulations to reduce greenhouse gases (GHG) emitted by passenger vehicles and light duty trucks. CARB adopted regulations in 2004, but due to legal delays was not granted the authority by the EPA to proceed until 2009. The adopted regulations apply to the vehicle manufacture of 2009 and later model year vehicles. CARB estimates that the regulations will reduce GHG emissions from light duty passenger vehicles by an estimated 18 percent in 2020 and by 27 percent in 2030 (Association of Environmental Professionals [AEP] 2007). GHG reductions would result from improved vehicle design that includes small engines with superchargers, continuously variable transmissions, and hybrid electric drives. These types of vehicle design would further improve fossil fuel economy, allowing harmonization with the federal rules and CAFE standards for passenger/light duty vehicles.

California Code of Regulations Title 24, Part 6 California Energy Code

All new construction in California must meet Title 24 energy standards (CEC 2008). Title 24, which provides energy efficiency standards for residential and nonresidential buildings, was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to incorporate new energy efficiency technologies and methods. For example, the current Title 24 standards achieve a minimum 15 percent reduction in the combined space heating, cooling, and water heating energy compared to the previous 2005 Title 24 energy standards.

California Code of Regulations Title 24, Part 11 California Green Building Code

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 in 2009, and became effective January 1, 2011. This code institutes mandatory minimum environmental performance standards that include the same energy efficiency requirements as Part 6 of Title 24, with optional Tier I and II standards for even greater energy efficiency. The code also mandates a 20 percent reduction in indoor water use, with voluntary goals and incentives for projects achieving 30 percent and over reduction. Because the provision of water involves large amounts of energy consumption, reduced water consumption would result in reduced energy demand.

Energy Action Plan

The state Energy Action Plan (2003, updated in 2008) was approved by the CPUC, the CEC, and the California Power Authority. The goal of the Energy Action Plan is to ensure that adequate, reliable, and reasonably priced electrical power and natural gas supplies, including prudent reserves, are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers (State of California 2008).

c. Regional

SDG&E Long-term Resource Plan

In 2004, SDG&E filed a long-term energy resource plan (LTRP) with the CPUC, which identifies how it will meet the future energy needs of customers in SDG&E's service area. The LTRP identifies several energy demand reduction (i.e., conservation) targets, as well as goals for increasing renewable energy supplies, new local power generation, and increased transmission capacity.

Consistent with Senate Bill 1078, the goals for increased renewable energy supplies in the 2004 LTRP call for acquiring 20 percent of SDG&E's energy mix from renewables by 2010 and 33 percent by 2020. This bill requires the state's three investor-owned utilities, including SDG&E, to increase their purchases of power generated from renewable resources in order to reduce reliance on fossil fuels and to reduce GHG emissions.

The LTRP also calls for greater use of in-region energy supplies, including renewable energy installations. By 2020, the LTRP states that SDG&E intends to achieve and maintain the capacity to generate 75 percent of summer peak demand with in-county generation. The LTRP also identifies the procurement of 44 percent of its renewables to be generated and distributed in-region by 2020.

5.9.2 Significance Determination Thresholds

Section 15126.4 (a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy.

CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project.

Based on the City's Significance Determination Thresholds for the purpose of this EIR, impacts to energy resources would be significant if the CPU would result in the use of excessive amounts of electric power, fuel, or other forms of energy (e.g., natural gas, oil) during its construction or long-term operation.

5.9.3 Issue: Energy

Would the CPU result in the use of excessive amounts of electricity or fuel and other forms of energy (e.g., natural gas, oil)?

5.9.3.1 Impacts

Because the proposed action is the adoption of a plan and does not specifically address any particular development project(s), impacts to energy resources are addressed generally, based on projected buildout of the CPU. Implementation of the CPU has the potential to result in impacts to energy supply due to the development that is anticipated to occur in response to projected population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the CPU would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code).

Energy resources would be consumed during construction of future development in conformance with the CPU. Energy also would be consumed to provide operational lighting, heating, cooling, and transportation for future development.

a. Construction-Related Energy Consumption

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program-level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. The majority of energy to be used in conjunction with construction activities would be supplied by SDG&E.

Policy 4.9-2 of the CPU Urban Design Element encourages new development and redevelopment proposals to incorporate environmentally conscious building practices and materials and use recycled and reused construction materials. Additionally, in compliance with the City's Construction and Demolition Debris Deposit Ordinance, future development would be required to develop waste management plans targeting at least 75% waste reduction.

Energy used during future construction of the planned land uses would not be considered significant given the short-term nature of the energy consumption. Even though exact details of the projects implemented in accordance with the CPU are not known at this time, there are no conditions in the CPU area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, the CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the CPU.

b. Long-Term Operational-Related Energy Consumption

SDG&E would provide gas and electricity to the CPU area. Because the proposed action is the adoption of a plan and does not specifically address any particular development project, impacts to energy resources can only be addressed generally, based on planned growth.

CalEEMod was used to estimate energy use for residential and non-residential uses, basing consumption on number of residential units and non-residential square footage. Table 5.9-2 below shows the estimated energy consumption in terms of natural gas and electricity for the CPU, compared to the existing condition (as built). As shown, buildout of the CPU would result in more natural gas and electricity consumption when compared to the existing condition.

TABLE 5.9-2
ESTIMATED ENERGY CONSUMPTION

Land Use Plan	Natural Gas (annual kBTU)	Electricity (annual kWh)
Existing (As-Built)	6.54E+08	4.51E+08
CPU	1.15E+09	7.72E+08

SOURCE: Air Quality Analysis, RECON 2012 (Appendix C of this PEIR).
kBTU = thousand British Thermal Units; kWh = kilowatt hours

Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects under the CPU would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code). Some efficiencies associated with the Energy Standards under Title 24 include the building heating, ventilating, and air conditioning (HVAC) mechanical system, water heating system, and lighting system. Additionally, rebate and incentive programs that promote the installation and use of energy efficient plug-in appliances and lighting would be available, but not covered under Title 24.

Future projects would be required to comply with the CPU Urban Design Element which contains a list of Climate Change and Sustainable Development Policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design (Policy 4.9-1), incorporating environmentally conscious building practices and materials (Policy 4.9-2), minimizing building heat gain and appropriately shading windows (Policy 4.9-3), providing on-site landscaping improvements that minimize heat gain and provide attractive and context sensitive landscape environments (CPU Policy 4.9-4), and ensuring development integrates storm water BMPs on-site (Policy 4.9-5).

Although these policies would decrease the overall per capita energy use in the CPU area, they would not ensure that energy supplies would be available when needed. Future projects would be subject to review for measures that would further reduce energy consumption in conformance to existing regulations.

The CPU's Conservation Element also sets forth goals to increase building energy efficiency and on-site production of renewable energy. Within the Climate Change and Sustainability section, a policy states that in order to reduce project-level GHG emissions to acceptable levels through project design, application of site-specific mitigation measures or adherence to standardized measures outlined in the City's adopted citywide Climate Action Plan should take place (Policy 8.2.4). The combination of planned sustainable building techniques and energy efficiency practices would result in a decrease in energy requirements relative to the current energy code (see the GHG Analysis in Appendix N).

A citywide Draft Climate Mitigation and Adaptation Plan (CMAP)~~, dated~~ was developed in August 2012~~, has been developed~~ to provide a mechanism for the City to achieve the goals of Assembly Bill 32 and the CARB Scoping Plan at a program-level. This document, now called the Climate Action Plan (CAP), has been revised to include 2035 targets that are on the trajectory for meeting the 2050 GHG reduction goals established by Executive Order S-3-05. The draft CAP was released for public review on December 3, 2013.

~~The combination of planned sustainable building techniques and energy efficiency practices would result in a decrease in energy requirements relative to the current energy code (see the GHG Analysis in Appendix N).~~

Future operational energy use related to roadways would consist of the transportation fuels consumed to transport the CPU area's residents, workers, and visitors. The total estimated daily vehicle trips at full buildout are estimated to be 1,045,025 as detailed in the traffic analysis. The CPU Mobility Element contains policies that would reduce vehicle miles travelled (VMT) and associated fuel consumption. These include policies to improve neighborhood walkability design (Policies 3.1-1 through 3.1-5), expand public transit in the CPU area (Policies 3.2-1 through 3.2-5), and increase bicycle infrastructure and bike riding incentives (Policies 3.4-1 and 3.4-2). The CPU area offers opportunity for transit use and reduced VMT with its village centers along existing and planned transit service which connect to Otay Mesa's employment lands.

5.9.3.2 Significance of Impacts

The CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the CPU, and construction impacts would be less than significant.

Implementation of the CPU would not be anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of the CPU, state and local mandates for energy conservation, and the energy reduction measures set forth in the CPU policies, impacts associated with energy use would be less than significant.

5.9.3.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.9.3.4 Significance After Mitigation

Impacts would be less than significant.

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5.10 Noise

The following analysis is based upon the Noise Technical Report for the Otay Mesa CPU, prepared by RECON in February 2013 (Appendix I). This section evaluates potential noise impacts from future traffic on CPU area roadways, operations at Brown Field and General Abelardo L. Rodriguez International Airport in Tijuana, and other local noise sources.

5.10.1 Existing Conditions

5.10.1.1 Existing Noise Standards

a. Construction Noise

Construction noise is regulated by the City's Municipal Code. Section 59.5.0404 of the Municipal Code, the Noise Abatement and Control Ordinance, states that:

> 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 . . .
>
> . . . 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.

b. Exterior Noise

General Plan

Noise standards are expressed in community noise equivalent level (CNEL), a 24-hour A-weighted average decibel level [dB(A)] that accounts for frequency correction and the subjective response of humans to noise by adding 5 dB(A) and 10 dB(A) to the evening and nighttime hours, respectively.

The City specifies compatibility standards for different categories of land use in the Noise Element of the General Plan. Table 5.10-1 provides the allowable noise levels by land use as identified in the General Plan (City of San Diego 2008a). As shown, the "compatible" noise level for noise sensitive land uses, including single- and multi-family residential, is 60 CNEL. Compatibility indicates that standard construction methods will

TABLE 5.10-1
LAND USE NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure [CNEL] 60	65	70	75
Open Space, Parks, and Recreational				
Community and Neighborhood Parks; Passive Recreation				
Regional Parks; Outdoor Spectator Sports, Golf Courses; Athletic Fields; Water Recreational Facilities; Horse Stables; Park Maintenance Facilities				
Agricultural				
Crop Raising and Farming; Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintaining and Keeping; Commercial Stables				
Residential				
Single Units; Mobile Homes; Senior Housing		45		
Multiple Units; Mixed-Use Commercial/Residential; Live Work; Group Living Accommodations		45	45	
Institutional				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45		
Vocational or Professional Educational Facilities; Higher Education Institution Facilities (Community or Junior Colleges, Colleges, or Universities)		45	45	
Cemeteries				
Sales				
Building Supplies/Equipment; Food, Beverage, and Groceries; Pets and Pet Supplies; Sundries, Pharmaceutical, and Convenience Sales; Wearing Apparel and Accessories			50	50
Commercial Services				
Building Services; Business Support; Eating and Drinking; Financial Institutions; Assembly and Entertainment; Radio and Television Studios; Golf Course Support			50	50
Visitor Accommodations		45	45	45
Offices				
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters			50	50
Vehicle and Vehicular Equipment Sales and Services Use				
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking				
Wholesale, Distribution, Storage Use Category				
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Wholesale Distribution				
Industrial				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking and Transportation Terminals; Mining and Extractive Industries				
Research and Development				50

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

SOURCE: City of San Diego 2008.

attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

General Plan policies recommend separating excessive noise-generating uses from sensitive land uses with sufficient buffer areas, consulting the guidelines from the table above to assure the appropriateness of proposed development relative to existing uses, and limiting noise-sensitive land uses in areas exposed to high levels of noise.

The CPU Noise Element includes specific policies for Otay Mesa, and are contained in Table 5.10-2. In particular, the CPU policies address noise that generates from Brown Field, Tijuana International Airport, and the truck traffic associated with industrial uses and international border activity.

TABLE 5-10-2
CPU NOISE ELEMENT POLICIES

Policy	Description
9.1-1	Satisfy all applicable conditions and criteria in the Airport Land Use Compatibility Plan for Brown Field prior to the approval of individual development projects for any proposed building or use located within the Airport Influence Area for Brown Field.
9.1-2	Include the evaluation of noise levels and demonstrate that the existing and future noise levels are considered compatible with the General Plan
9.2-1	Encourage site design techniques for mixed-use village areas that help to reduce the affect of noise from commercial and industrial uses.
9.2-2	Demonstrate that required noise levels for individual development projects within Otay Mesa are considered compatible with the General Plan Noise Land Use Compatibility Guidelines prior to the approval of the project.
9.2-3	Include noise reduction features in the design of any project with noise sources that may affect adjacent and/or sensitive uses.
9.3-1	Work with the California Department of Transportation and affected property owners to place berms or noise walls along State Routes 905, 125, and 11 and Interstate 805 to reduce high noise levels.
9.3-2	Minimize noise impacts to adjacent uses along the Truck Route.

Exterior noise levels ranging between 65 and 70 CNEL are considered “conditionally compatible” for multiple units, mixed-use commercial/residential, live work, and group living accommodations. For single-family units, mobile homes, and senior housing, exterior noise levels ranging between 60 and 65 CNEL are considered “conditionally compatible.” Conditionally compatible uses are permissible, provided interior noise levels will not exceed 45 CNEL. Developments that fall into the “conditionally compatible” noise environment are required to have an acoustical study to demonstrate that they meet noise standards.

Municipal Code

Section 59.5.0101 et seq. of the City's Municipal Code, the Noise Abatement and Control Ordinance, regulates the making and creating of disturbing, excessive, or offensive noises within the City limits. Sound level limits are established for various types of land uses and are measured in one-hour averages. The one-hour, A-weighted equivalent sound level, $L_{eq(1)}$, is the energy average of the A-weighted sound levels occurring during a one-hour period. The Ordinance states that it is unlawful for any person to cause noise by any means to the extent that the one–hour average sound level exceeds the applicable limit given for that land use. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

c. Interior Noise

City of San Diego

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 CNEL, as stated in the City's 2011 Significance Determination Thresholds and the California Noise Insulation Standards. The Significance Determination Thresholds indicate that for multi-family development, exterior noise levels would be considered significant if future projected traffic noise would exceed 65 CNEL at exterior usable areas or 45 CNEL interior.

The City considers standard construction techniques to provide a 15 decibel (dB) reduction of exterior noise levels to an interior receiver. Therefore, standard building construction would reduce interior noise levels to 45 CNEL or less when exterior noise sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific non-standard building construction techniques would be required.

California Code of Regulations

Title 24, Chapter 12, Section 1207, of the California Building Code requires that interior noise levels, attributable to exterior sources, not exceed 45 CNEL in any habitable room within a residential structure, other than single-family. (A habitable room in a building is used for living, sleeping, eating or cooking; bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable spaces.) An acoustical study would be required for proposed multiple-unit residential and hotel/motel structures within areas where the CNEL noise contours exceed 60 dB(A). The studies must demonstrate that the design of the building will reduce interior noise to 45 CNEL or lower in habitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air conditioning (24 CCR 1207 2010).

d. ALUCP

As discussed in Section 5.1, the Brown Field airport is within the CPU area. The adopted ALUCP for Brown Field contains policies that limit residential uses in areas experiencing noise above 60 CNEL by placing conditions on new residential uses within the 60 CNEL contour. Table 5.10-3 provides the allowable noise levels by land use.

5.10.1.2 Existing Ambient Noise

The CPU area is subject to various existing noise sources including traffic on circulation element roads, traffic on I-805, aircraft from Brown Field and General Abelardo L. Rodriguez International Airport in Tijuana, and industrial and commercial activities, including associated truck traffic. The following is a discussion of measured noise levels and existing noise sources in the CPU area.

a. Vehicle Traffic Noise

The most heavily traveled roadways in the CPU area are I-805, SR-905, Siempre Viva Road, and Otay Mesa Road. Additionally, because the CPU area consists of many existing commercial and industrial uses, there is a high percentage of heavy truck traffic within the CPU area, including designated truck routes in the CPU area that service these commercial and industrial areas, which include I-805, SR-905, SR-125, Britannia Boulevard, La Media, Enrico Fermi Drive, Siempre Viva Road, and Lone Star Road.

TABLE 5-10-3
BROWN FIELD NOISE COMPATIBILITY CRITERIA

Land Use Category[1] *Note: Multiple categories may apply to a project*	Exterior Noise Exposure (CNEL)			
	60-65	65-70	70-75	75-80
Agricultural and Animal-Related				
Horse stables; livestock breeding or farming	**A**	**A**	**A**	
Nature preserves; wildlife preserves				
Interactive nature exhibits	**A**			
Zoos	**A**	**A**		
Agriculture (except residences and livestock); greenhouses; fishing				**A**
Recreational				
Children-oriented neighborhood parks; playgrounds	**A**			
Campgrounds; recreational vehicle/motor home parks				
Community parks; regional parks; golf courses; tennis courts; athletic fields; outdoor spectator sports; fairgrounds; water recreation facilities		**A**		
Recreation buildings; gymnasiums; club houses; athletic clubs; dance studios		**50**	**50**	
Public				
Outdoor amphitheaters	**A**			
Children's schools (K-12); day care centers (>14 children)	**45**			
Libraries	**45**			
Auditoriums; concert halls; indoor arenas; places of worship	**45**	**45**		
Adult schools; colleges; universities[2]	**45**	**45**		
Prisons; reformatories		**50**		
Public safety facilities (e.g., police, fire stations)		**50**	**50**	
Cemeteries; cemetery chapels; mortuaries		**45** **A**	**45** **A**	
Residential, Lodging, and Care				
Residential (including single-family, multi-family, and mobile homes); family day care homes (≤14 children)	**45**			
Extended-stay hotels; retirement homes; assisted living; hospitals; nursing homes; intermediate care facilities	**45**			
Hotels; motels; other transient lodging[3]	**45**	**45**	**45**	
Commercial and Industrial				
Office buildings; office areas of industrial facilities; medical clinics; clinical laboratories; radio, television, recording studios		**50**	**50**	
Retail sales; eating/drinking establishments; movie theaters; personal services		**50**	**50** **B**	
Wholesale sales; warehouses; mini/other indoor storage			**50** **C**	
Industrial manufacturing; research & development; auto, marine, other sales & repair services; car washes; gas stations; trucking, transportation terminals			**50** **C**	
Extractive industry; utilities; road, rail right-of-ways; outdoor storage; public works yards; automobile parking; automobile dismantling; solid waste facilities				**50** **C**
Animal shelters/kennels	**50**	**50**	**50**	

TABLE 5.10-3
BROWN FIELD NOISE COMPATIBILITY CRITERIA
(continued)

Land Use Acceptability		Interpretation/Comments
	Compatible	Indoor Uses: Standard construction methods will sufficiently attenuate exterior noise to an acceptable indoor community noise equivalent level (CNEL). Outdoor Uses: Activities associated with the land use may be carried out with essentially no interference from aircraft noise.
45 **50**	Conditional[4]	Indoor Uses: Building structure must be capable of attenuating exterior noise to the indoor CNEL indicated by the number, standard construction methods will normally suffice. Outdoor Uses: CNEL is acceptable for outdoor activities, although some noise interference may occur.
A **B** **C**	Conditional[4]	Indoor and Outdoor Uses: A Caution should be exercised with regard to noise-sensitive outdoor uses; these uses are likely to be disrupted by aircraft noise events; acceptability is dependent upon characteristics of the specific use.[5] B Outdoor dining or gathering places incompatible above 70 CNEL. C Sound attenuation must be provided for associated office, retail, and other noise-sensitive indoor spaces sufficient to reduce exterior noise to an interior maximum of 50 CNEL.
	Incompatible	Use is not compatible under any circumstances.

SOURCE: San Diego County Regional Airport Authority 2010.

[1]Land uses not specifically listed shall be evaluated, as determined by the ALUC, using the criteria for similar uses.

[2]Applies only to classrooms, offices, and related indoor uses. Laboratory facilities, gymnasiums, outdoor athletic facilities, and other uses to be evaluated as indicated for those land use categories.

[3]Lodging intended for stays by an individual person of no more than 25 days consecutively and no more than 90 days total per year; facilities for longer stays are in the extended-stay hotel category.

[4]An *aviation easement* is required for any project situated on a property lying within the projected 65 CNEL noise contour. See Policy 2.11.5 and Policy 3.3.3(d).

[5]Noise-sensitive land uses are ones for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common types of noise-sensitive land uses include, but are not limited to, the following: residential, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child-care facilities, and certain types of passive recreational parks and open space.

b. Noise Measurements

Eight 15-minute noise measurements were taken in the CPU area in 2011 and 2012. Measurement locations are shown in Figure 5.10-1.

Measurements 1–5 were taken on June 15, 2011; at this time, SR-905 was under construction. SR-905 now connects the Otay Mesa POE with regional freeways I-5 and I-805. Phase 1 from the Otay Mesa POE to Airway Road was completed at the time of the June 2011 noise measurements. Also completed was the SR-905 link with I-805. The Phase 2 connection to I-805 was completed in 2012. Before the Phase 2 link was completed, traffic traveling on SR-905 was diverted onto Otay Mesa Road. Therefore, SR-905/Otay Mesa Road experienced high traffic volumes including heavy truck traffic at the time of the first noise measurements. Measurements 6-8 were taken after completion of the SR-905.

Measurement 1 was taken adjacent to Ocean View Hills Parkway in the residential area of Otay Mesa. The main source of noise at the measurement location was traffic on Ocean View Hills Parkway. The speed limit on this portion of Ocean View Hills Parkway is 45 miles per hour (mph). The average measured noise level at 40 feet from the centerline of Ocean View Hills Parkway was 72.3 dB(A) L_{eq}.

Measurement 2 was taken in a commercial parking lot on a hill overlooking I-805. The main source of noise at the measurement location was traffic on I-805. The average measured noise level was 80.9 dB(A) L_{eq}.

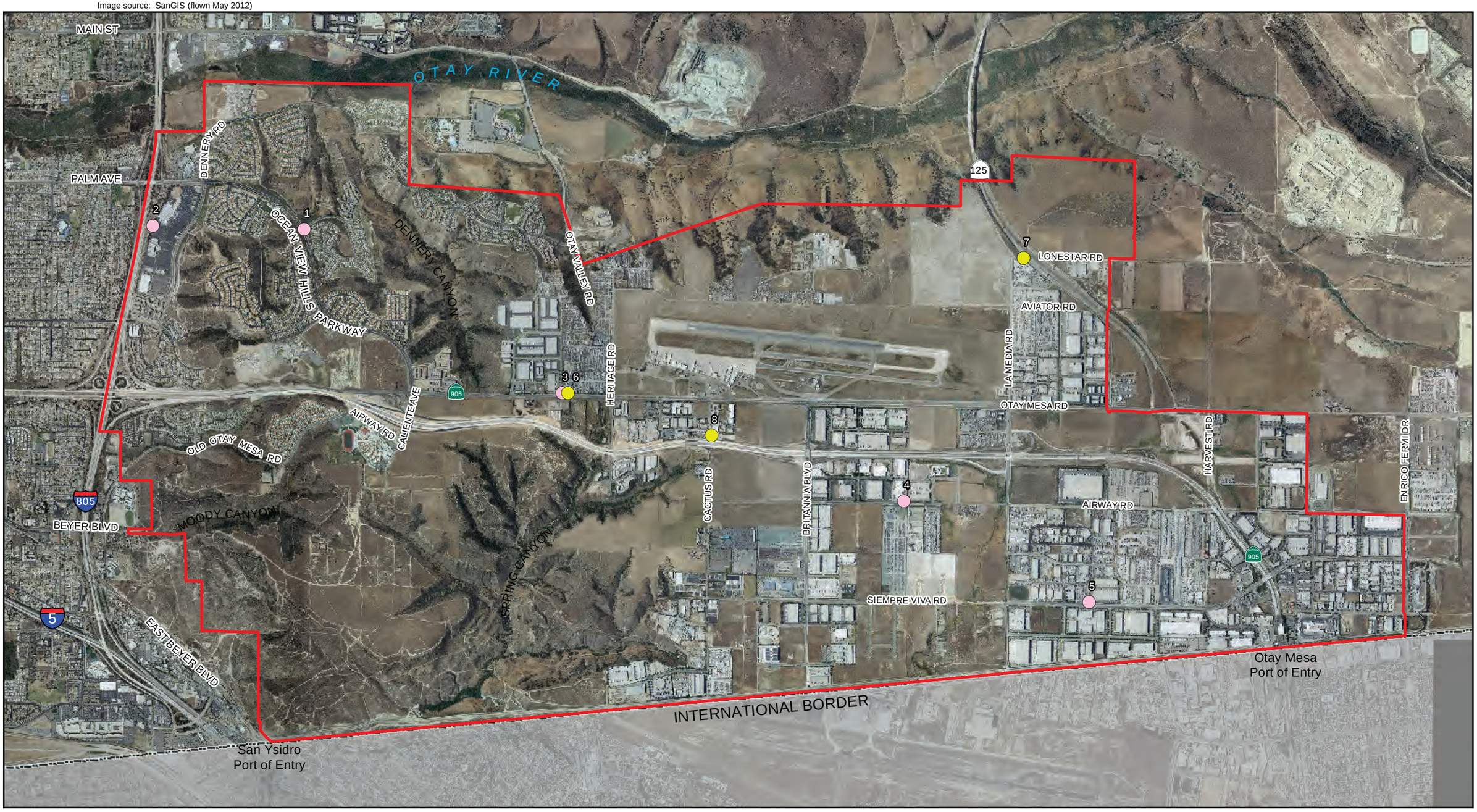
Measurement 3 was taken adjacent to SR-905/Otay Mesa Road. The speed limit on this portion of Otay Mesa Road is 45 mph. The average measured noise level at approximately 85 feet from the centerline was 77.3 dB(A) L_{eq}.

Measurement 4 was taken adjacent to Airway Road in an industrial portion of the CPU area. Because of the amount of industrial uses, Airway Road experiences high heavy truck volumes. The speed limit on this portion of Airway Road is 40 mph. The average measured noise level at 30 feet from the centerline was 72.6 dB(A) L_{eq}.

Measurement 5 was taken adjacent to Siempre Viva Road. Like Airway Road, Siempre Viva Road experiences high heavy truck volumes. The speed limit on this portion of Siempre Viva Road is 40 mph. The average measured noise level at 60 feet from the centerline was 72.1 dB(A) L_{eq}.

Measurements 6 through 8 were taken on October 18, 2012; at this time, SR-905 had been completed. With the completion of SR-905, Otay Mesa Road carries a lower traffic volume, including less heavy truck traffic than in previous years.

Image source: SanGIS (flown May 2012)



0 Feet 2,500

Otay Mesa Community Plan Boundary

Noise Measurement Locations

- June 15, 2011
- October 18, 2012

FIGURE 5.10-1

Noise Measurement Locations

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Measurement 6 was taken adjacent to SR-905/Otay Mesa Road near Innovative Drive. The speed limit on this portion of Otay Mesa Road is 45 mph. The average measured noise level at approximately 93 feet from the centerline was 68.7 dB(A) L_{eq}.

Measurement 7 was taken adjacent to a semi-trailer storage area overlooking SR-125. The main source of noise at the measurement location was traffic on SR-125. The average measured noise level was 61.5 dB(A) L_{eq}.

Measurement 8 was taken on Cactus Road, adjacent to SR-905. The main source of noise at the measurement location was traffic on SR-905. The average measured noise level was 72.0 dB(A) L_{eq}.

Table 5.10-4 presents the results of the noise measurements. Table 5.10-5 summarizes the 15-minute traffic counts.

TABLE 5.10-4
MEASURED NOISE LEVELS

Location	Date	Average Noise Level [dB(A)]	Traffic Noise Sources	Distance From Centerline (feet)	Noise Level at 50 feet from Source [dB(A)]
1	06/15/11	72.3	Ocean View Hills Parkway	40	71.3
2	06/15/11	72.7	I-805	330	80.9
3	06/15/11	77.3	SR-905/Otay Mesa Road	85	79.6
4	06/15/11	74.8	Airway Road	30	72.6
5	06/15/11	72.1	Siempre Viva Road	60	72.9
6	10/18/12	68.7	Otay Mesa Road	93	71.4
7	10/18/12	55.2	SR-125	215	61.5
8	10/18/12	66.0	SR-905	197	72.0

TABLE 5.10-5
15-MINUTE TRAFFIC COUNTS

	Roadway	Autos	Medium Trucks	Heavy Trucks	Buses	Motorcycles
1	Ocean View Hills Parkway	134	3	1	0	1
4	Airway Road	49	4	38	2	4
5	Siempre Viva Road	68	5	28	2	6

c. Air Traffic Noise

Brown Field and General Abelardo L. Rodriguez International Airport in Tijuana also generate noise within the CPU area. Figure 5.10-2 shows the existing noise contours associated with operations at these airports (San Diego County Regional Airport Authority 2003, 2010). As shown, the primary source of aircraft noise in the CPU area is

due to operations at Brown Field. Only a small portion of the CPU area is located within the 65-CNEL contour line of the General Abelardo L. Rodriguez International Airport.

d. Other Sources of Noise

Other sources of noise within the CPU area are due to the normal activities associated with a given land use. For example, within residential areas noise sources include dogs, landscaping activities, and parties. Commercial uses include car washes, fast food restaurants, and auto repair facilities. Sources of noise in industrial and manufacturing areas include heavy machinery and truck loading/unloading. Noises from these types of activities would be considered normal environmental noises that would be expected to occur within these types of land uses and are not typically considered significant sources of noise. The City's Municipal Code regulates excessive noises resulting from these types of activities.

5.10.2 Significance Determination Thresholds

Based on the City's Significance Thresholds, noise impacts would be significant if the CPU would:

1. Result in the exposure of people to current or future transportation noise levels that would exceed standards established in the Transportation Element of the General Plan and land use compatibility guidelines in the Brown Field Comprehensive Land Use Plan;

2. Result in exposure of future residents to excessive noise levels from airport and aircraft operations;

3. Allow collocation of residential and commercial or industrial uses where exposure of people to noise levels would exceed the City's Noise Abatement and Control Ordinance; or

4. Adversely impact sensitive species within the MHPA due to construction noise.

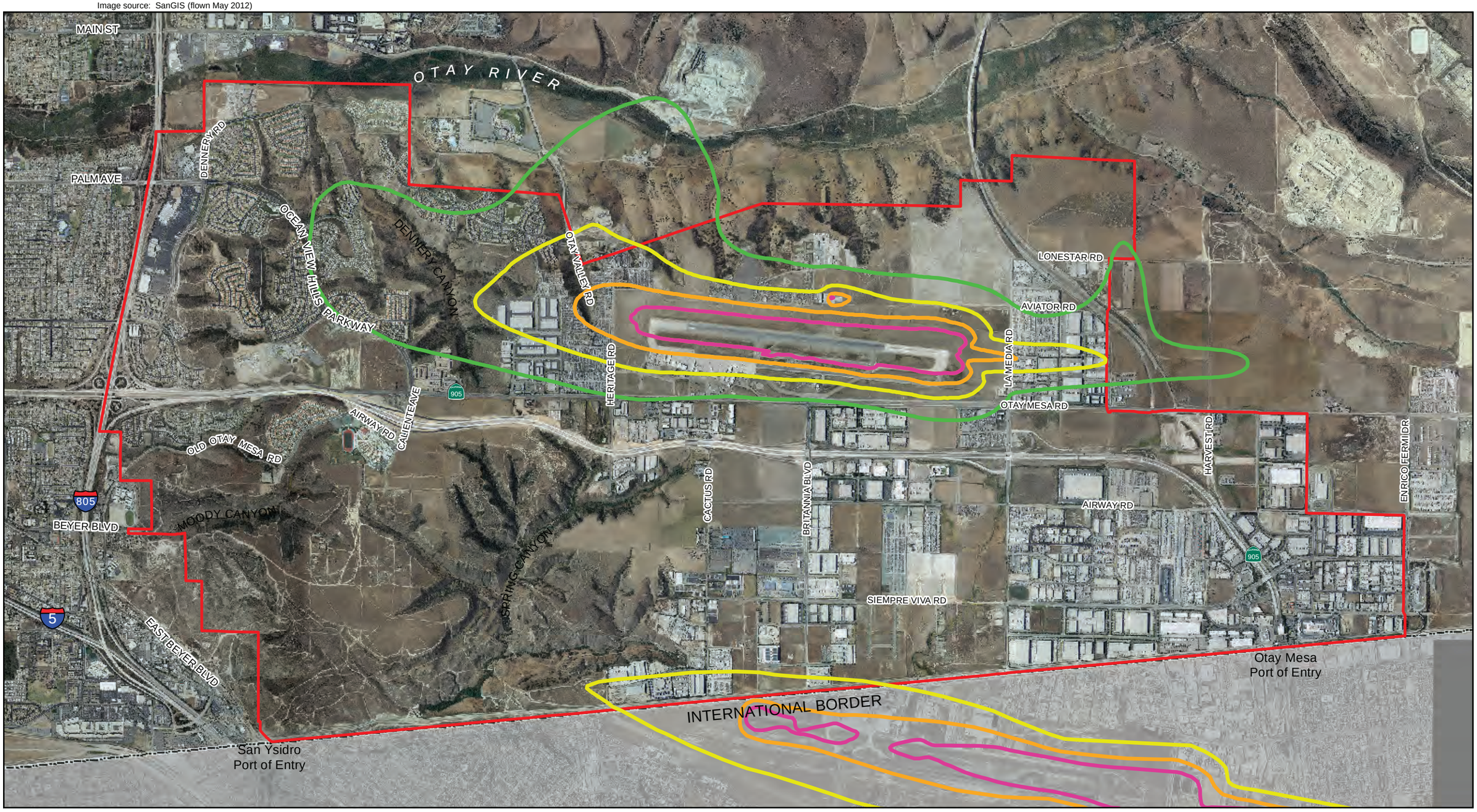
5.10.3 Issue 1: Traffic Generated Noise Impacts

Would the CPU result in a significant increase in the existing ambient noise level?

5.10.3.1 Impacts

Traffic-generated noise impacts for the CPU were estimated based on future traffic volumes for the CPU obtained from the traffic study (see Appendix J), posted speeds, proposed truck routes and estimated vehicle mix on various roads. (See Appendix I for a full description of input into the noise models). Modeling results are based on flat

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Airport Noise Contours

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

0 Feet 2,500

FIGURE 5.10-2
Airport Noise Contours and
Existing Land Uses

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topography with no intervening terrain between noise sensitive land uses and roadways. Because no obstructions were input in the noise model, the predicted noise levels in most instances are higher than would actually occur, since the existing topography and structures would serve to reduce noise impacts. According to the Federal Highways Administration (FHWA), first-row structures provide 3–5 dB(A) reduction from traffic noise, depending on the building-to-gap ratio, with additional rows providing 1.5 dB(A) of additional attenuation for each subsequent row (FHWA 2011). Therefore, the noise levels presented here represent a conservative assessment of noise propagation.

Future noise contours and the CPU land uses are shown in Figure 5.10-3. As previously discussed, buildings, walls, and other barriers would impede the direct line of sight between roadway and receptor and reduce actual noise levels.

As shown in Figure 5.10-3, traffic noise levels associated with the CPU would result in potentially significant impacts 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. As shown, traffic noise levels at existing and proposed residential land uses would exceed the City's compatibility thresholds for most residential land uses; however, noise levels would be within the conditionally compatible range for the majority of locations. While the City has a compatibility level of 60 CNEL or less for residential uses, noise levels of 61–65 CNEL are generally considered acceptable for residential uses since interior noise levels can be reduced to 45 CNEL through simple means, such as closing/sealing windows and providing mechanical ventilation which are addressed during building plan check review in accordance with Title 24. Additionally, passive mitigation such as noise walls can usually reduce exterior noise levels to comply with City standards. The majority of proposed residential land uses would be located within this noise compatibility zone.

The greatest concentration of residential uses within the 66–70 CNEL noise level range would be south of Airway Road, and west and east of Caliente Avenue. Noise levels of 66–70 CNEL are more difficult to reduce to compatible levels in single-family structures and these uses are typically precluded from these areas; however, multiple-family residential development would provide the required structural attenuation to reduce noise levels at interior locations in accordance with Title 24 requirements. Additionally, due to the provision of common exterior use areas, multi-family residential would provide greater shielding to these smaller areas, thus providing exterior use areas that comply with City standards. Additionally, the CPU includes specific policies for Otay Mesa as shown in Table 5.10-2 which identifies the requirement for a noise impact analysis, noise compatibility, truck traffic noise reduction methods, design measures to reduce impacts to sensitive receptors and regulatory compliance.

Noise levels of 71–75 CNEL are very difficult to reduce to compatible interior noise levels in most residential structures and noise sensitive land uses are typically precluded from these areas. Additionally, land uses in areas with noise levels this high or greater

would not be capable of providing sufficient shielding for exterior use areas. Existing and proposed residential land uses located southeast of Ocean View Hills Parkway and Del Sol Boulevard, and existing land uses east of I-805, north and south of SR-905, would be exposed to noise levels in excess of 70 CNEL.

Noise levels greater than 75 CNEL are typically limited to industrial uses or retail commercial uses. Based on the presented noise contours, existing residential uses within 1,000 feet of SR-905, and within 1,500 feet of I-805, in the western portion of the CPU area would be located within the 75 CNEL contours for I-805 and SR-905.

As described above, the CPU proposes land uses in areas where exterior noise levels exceed the City's noise and land use compatibility thresholds as defined in the General Plan, Table N-3. For future development of properties located in areas where exterior noise levels exceed 60 CNEL, site-specific noise studies would be required.

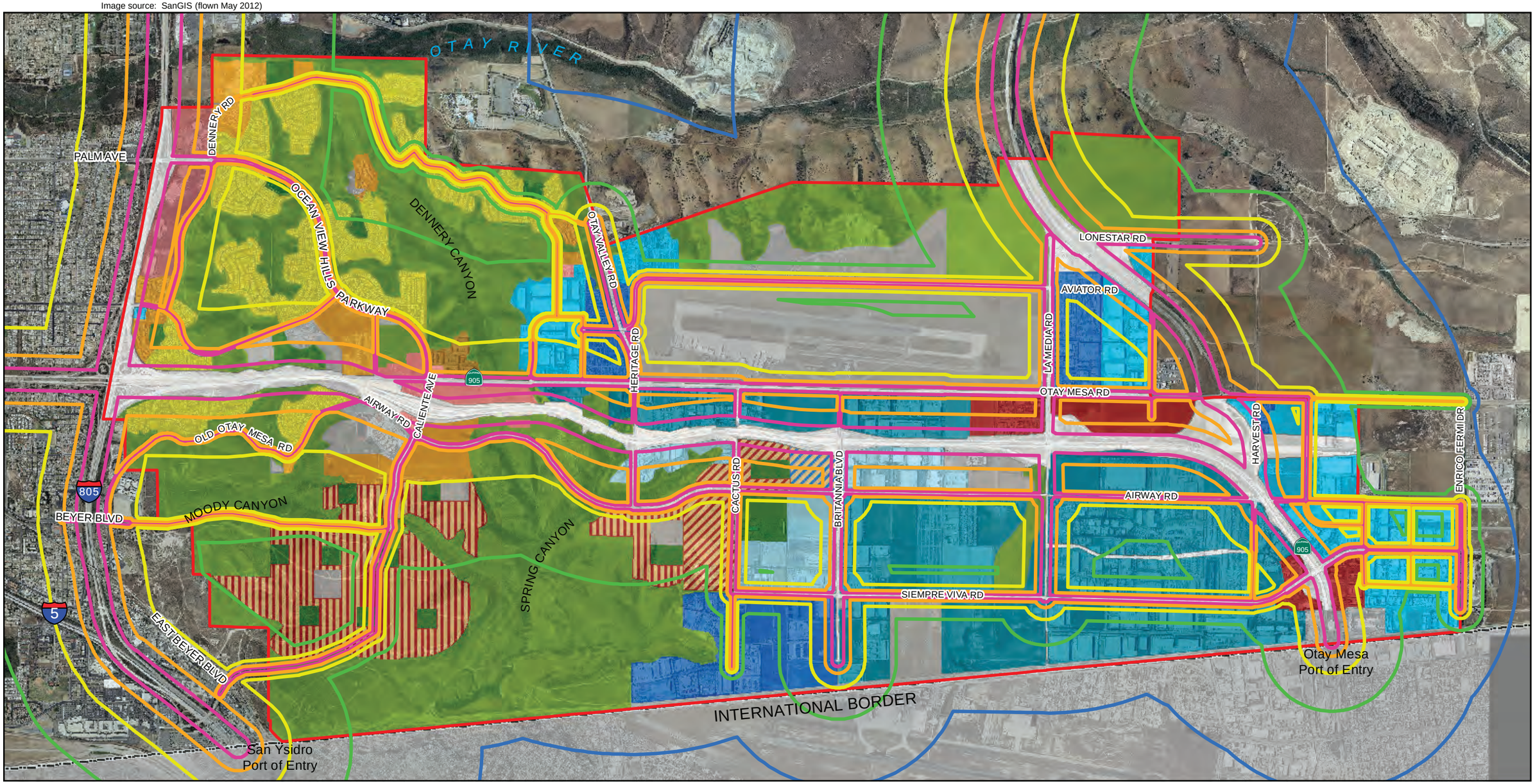
Additionally, traffic noise effects on existing residences from subsequent projects implemented in accordance with the CPU would be potentially significant, particularly in the western portion of the CPU along the I-805 and SR-905, where project traffic noise would exceed the exterior noise level threshold and would potentially result in interior noise levels in existing residences to exceed applicable standards. Many older residences would not be structurally sound enough to achieve current interior noise standards. There is the potential that CPU traffic would generate noise levels that exceed current standards at these existing residences resulting in a potentially significant impact.

5.10.3.2 Significance of Impacts

Based on the noise analysis, exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road (see Figure 5.10-3). While the regulatory framework would provide for the maximum practical noise abatement that would be implemented at the project-level, because of the variability of noise sources and the proximity to existing and potential noise sources in the CPU area, it cannot be guaranteed that future land uses would not expose existing uses to noise levels in excess of City standards. Therefore, impacts related to traffic noise impacts to new residences would be significant.

There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. As these may be older residences, which would not have been constructed to achieve current interior noise standards, there is the potential that project traffic may generate noise levels that exceed current standards at these existing residences. This is a potentially significant impact of the CPU.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Future Traffic Noise Contours
- 55 CNEL
- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

Proposed Land Use Plan

Open Space, Parks, Institutional
- Open Space
- Parks
- Institutional

Village Centers
- Neighborhood Village
- Community Village

Residential
- Low
- Low Medium
- Medium
- Medium High

Commercial - Residential Prohibited
- Community Commercial
- Regional Commercial
- Heavy Commercial

Indistrial
- Business Park - Office Permitted
- Business and International Trade
- Light Industrial
- Heavy Industrial
- Business Park - Residential Permitted

Other
- Right-of-Way

0 Feet 2,500

FIGURE 5.10-3
Future Traffic Noise Contours and Land Uses for the Proposed CPU

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5.10.3.3 Mitigation Framework

With implementation of the framework of regulations, standards, and policies, project-level noise protection measures for future subsequent development projects' noise impacts would be reduced. However, it is possible that for certain projects, adherence to the regulations would not adequately reduce noise levels, and therefore, these projects would require additional measures to avoid or reduce significant impacts. Implementation of Mitigation Framework measures NOI-1 and NOI-2 would reduce future development project-level impacts. The identified measures shall be updated, expanded and refined when applied to future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

NOI-1: Prior to the issuance of building permits, site-specific exterior noise analyses that demonstrate that the project would not place residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

NOI-2: Prior to the issuance of building permits, site specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings, placing HVAC in noise reducing enclosures, or designing buildings so that no windows face freeways or major roadways may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site specific exterior noise analyses.

5.10.3.4 Significance after Mitigation

Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road (see Figure 5.10-3).

Future development projects implemented in accordance with the CPU would be required to comply with the recommendations included in an acoustical report prepared

in accordance with City Acoustical Report Guidelines, the GP and CPU policies. Strict adherence to the Mitigation Framework detailed in NOI-1 and NOI-2 which requires regulatory compliance as noted above may ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, these impacts cannot be reduced to below a level of significance and therefore, the impacts remain significant and unavoidable.

Additionally, project traffic noise effects on existing residences would be significant. There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. Due to the fact that these would be older homes which would not have been constructed to achieve current interior noise standards, there is the potential that project traffic would generate noise levels that exceed current standards at these existing residences. No mitigation is available for traffic noise impacts to existing residences. Impacts would remain significant and unavoidable.

5.10.4 Issue 2: Stationary Source Noise (Collocation)

Could the proposed collocation of residential and commercial or industrial land uses result in the exposure of people to noise levels which exceed the City's Noise Abatement and Control Ordinance?

5.10.4.1 Impacts

The CPU strives to integrate land uses in accordance with the City of Villages concept. As such, noise sensitive land uses, such as residential, would be located in proximity to noise generating land uses, such as commercial and industrial land uses.

Stationary sources of noise include activities associated with a given land use. For example, noise sources in commercial uses would include car washes, fast food restaurants, auto repair facilities, parking lots, and a variety of other uses; sources of noise in industrial and manufacturing areas would include heavy machinery, truck loading/unloading, and other industrial activities. Mixed-use areas would also contain residential and commercial interfaces. As shown, there are areas where noise sensitive residential uses would be located adjacent to noise generating uses. These include the mixed-use villages where there is a residential–commercial interface and residential areas adjacent to commercial and industrial land uses.

To reduce the typical average commercial and industrial noise levels, which range from 60 to 80 dB(A) L_{eq} at 50 feet, to the daytime single-family residential noise level limit of 50 dB(A) L_{eq}, a buffer distance ranging from 50 to 500 feet would be required. Site-specific noise reduction measures such as noise barriers would allow for reduced buffer distances. However, without project-specific details, noise levels generated by these

activities associated with future development under the CPU cannot be anticipated at the program-level.

Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial and industrial uses, City policies in place are intended to control noise and reduce noise impacts between various land uses. The City's noise policies, as contained in the General Plan and Noise Abatement and Control Ordinance, include policies and regulations that require noise studies for land uses proposed for potentially incompatible locations, limits on hours of operation for various noise generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. In addition, the previously described federal, state, and local noise regulations preclude or reduce significant impacts. Moreover, the CPU includes policies to reduce noise impacts. Such policies include requiring site design considerations and other measures to reduce noise levels from these noise generating uses where an interface with noise sensitive land uses occurs. The CPU also defines acceptable methods for separating sensitive receptors within the CPU area, in the form of roads and parking to reduce noise levels to sensitive receptors. These criteria would be applied as future development is proposed to implement the CPU.

5.10.4.2 Significance of Impacts

As discussed above, the CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts. While the framework of federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance, no project-level site plans or implementation programs have been considered as part of this PEIR. Without detailed operational data it cannot be verified that compliance with existing regulations would reduce all impacts to below a level of significance. As the degree of success of regulations cannot be adequately known for each project at this program-level of analysis, the program-level impact related to noise from stationary sources would be significant.

5.10.4.3 Mitigation Framework

The framework of regulations, standards, and policies by the City combined with the federal state and local regulations described above provide a framework for developing project-level noise protection measures for future subsequent development projects implemented in accordance with the CPU. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the CPU.

Operational noise from various land uses could adversely impact adjacent properties, either individually or cumulatively. In general, implementation of the policies included in the CPU and General Plan shall preclude or reduce noise impacts relative to construction noise and collocation issues. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately reduce noise levels, and, as such, would require additional measures to avoid or reduce significant impacts.

For each future development projects requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures shall be identified that reduce significant project-level impacts to below a level of significance or the project-level impact shall remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures shall be included in a future MMRP for the project. Where mitigation is determined to be infeasible, a project shall not be approved unless all feasible measures have been incorporated into the project design.

The following mitigation measure shall be implemented to reduce project-level impacts and may ensure that on-site generated noise does not exceed the limits of Section 59.5.0101 et seq. of the City's Municipal Code, the Noise Abatement and Control Ordinance. This measure shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

NOI-3: Prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. 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 as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site specific noise analyses.

5.10.4.4 Significance after Mitigation

Future development projects implemented in accordance with the CPU would be required to comply with the recommendations included in an acoustical report prepared

in accordance with City Acoustical Report Guidelines, the GP and CPU policies. Strict adherence to the Mitigation Framework detailed in NOI-3 which requires preparation and submittal of a site-specific acoustical/noise analysis, along with regulatory compliance as noted above would ensure that impacts related to the generation of noise levels in excess of standards established in the City's Municipal Code are reduced; however, even with strict adherence to the Mitigation Framework, these impacts cannot be reduced to below a level of significance and therefore, the impact remains significant and unavoidable.

5.10.5 Issue 3: Airport Noise

Would the CPU result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan?

5.10.5.1 Impacts

The primary sources of aircraft noise in the vicinity of the CPU area are operations associated with Brown Field, located within the CPU area, and General Abelardo L. Rodriquez International Airport in Tijuana, just south of the U.S.-Mexico Border. Figure 5.10-2 shows the existing airport noise contours in the CPU area. As shown, existing residential uses located east of Ocean View Hills Parkway are located within the 60 CNEL contour line for Brown Field and two existing residential areas are located within the 65 CNEL contour. No residential currently exists within the 70 CNEL or greater contours, and none is proposed under the CPU. No new residential development is proposed within the Brown Field 60 or 65 CNEL contours. As shown in Table 5.10-2, these residential areas are conditionally compatible within 60 to 65 CNEL. Noise levels are acceptable between 60 and 65 CNEL, provided that interior noise levels for residential uses do not exceed 45 CNEL.

Several commercial and industrial uses are also located within the Brown Field AIA. These uses are compatible with noise levels up to 75 CNEL (see Table 5.10-2). However, noise levels at these areas do not exceed 70 CNEL due to operations at Brown Field.

As shown in Figure 5.10-2, the 65 CNEL contour line for General Abelardo L. Rodriguez International Airport crosses the southernmost boundary of the CPU area. Existing and proposed industrial uses are located within this 65 CNEL contour line. Typical commercial and industrial uses are conditionally compatible within 70 to 75 CNEL with an interior noise level of 50 CNEL for associated offices. However, public works yards, outdoor storage, extractive industry, and solid waste facilities are compatible up to 75 dB (A). Typical commercial and industrial construction provides 25–30 dB(A) attenuation from exterior noise sources. Therefore, noise levels of 70 CNEL would be reduced to

40–45 CNEL within structures located within this zone. Therefore, interior noise levels would comply with the applicable standards.

5.10.5.2 Significance of Impacts

Existing residential uses would be located within the 60 and 65 CNEL contours for Brown Field. Existing and future industrial uses would be located within the General Abelardo L. Rodriguez International Airport 70 CNEL contour. These uses would be considered conditionally compatible with these noise levels as long as the uses meet the interior noise level standards. Although these are existing uses, the structural attenuation of these structures cannot be adequately determined at this program-level analysis, therefore, potentially significant impacts would result at these residences. No new residential land uses are proposed within the Brown Field contours, thus no new impact on future residential uses are anticipated. Additionally, noise levels would not exceed 70 CNEL at any nearby industrial uses. Based on the standard attenuation associated with commercial and industrial, exterior noise levels of 70 CNEL would be reduced to 40-45 CNEL within structures located within this zone. Therefore, impacts to future land uses would be less than significant.

5.10.5.3 Mitigation Framework

Existing land uses are currently exposed to conditionally acceptable noise levels from operations at Brown Field and the General Abelardo L. Rodriguez International Airport. These noise levels exceed the thresholds, however, the CPU would not alter operations at either airport; this is not considered a project impact. No airport noise impacts are anticipated for proposed uses from either airport and no mitigation measures are required.

5.10.5.4 Significance After Mitigation

Impacts would be less than significant.

5.10.6 Issue 4: Construction Noise

Would temporary construction noise from the proposed neighborhood developments or permanent noise generators (including roads) adversely impact sensitive receptors or sensitive bird species (e.g., coastal California gnatcatcher) within the MHPA?

5.10.6.1 Impacts

Construction Noise Impacts

Construction activities related to implementation of the CPU would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Some construction activities have the potential to produce noise in excess of 75 dB(A) L_{eq}, and could therefore be potentially significant if their activity is heard by sensitive receptors. The City regulates noise associated with construction equipment and activities through enforcement of Noise Abatement and Control Ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits. Because the degree of success of these regulations and conditions cannot be adequately known for each project at this program-level of analysis, the program-level impact related to construction noise would be potentially significant.

Noise associated with the earthwork, construction, and surface preparation for future development projects within the CPU area would result in short-term, temporary noise impacts that could result in potentially significant impacts to coastal California gnatcatchers within the MHPA, as described in Sections 5.1 and 5.4.

A variety of noise-generating equipment would likely be used during construction of future development (i.e., scrapers, dump trucks, backhoes, front-end loaders, jackhammers, along with others). This equipment can individually generate noise levels that range between 77 and 91 dB(A) at 50 feet from the source. Construction-generated noise above 60 CNEL would result in significant impacts during the breeding and nesting period of March 1 to August 15 if coastal California gnatcatchers are breeding or nesting in adjacent MHPA lands. Potentially significant impacts to coastal California gnatcatchers (e.g., disruption of nesting activities) are discussed in more detail in the Sections 5.1 and 5.4 of this PEIR.

5.10.6.2 Significance of Impacts

As discussed above, implementation of the CPU at the project-level has the potential to exceed applicable construction thresholds at future residential properties adjacent to construction sites.

Additionally, there is the potential for construction noise to impact least Bell's vireo, coastal California gnatcatcher, raptors, and other sensitive species if they are breeding or nesting in adjacent MHPA lands. These impacts are significant at the program-level.

5.10.6.3 Mitigation Framework

The following mitigation measure shall be implemented to reduce project-level impacts. This measure shall be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

NOI-4: For projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location. Control measures shall include:

a. Minimizing simultaneous operation of multiple construction equipment units;

b. Locating stationary equipment as far as reasonable from sensitive receptors;

c. Requiring all internal combustion-engine-driven equipment to be equipped with mufflers that are in good operating condition and appropriate for the equipment; and

d. Construction of temporary noise barriers around construction sites that block the line-of-sight to surrounding receptors.

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

5.10.6.4 Significance After Mitigation

Future development projects implemented in accordance with the CPU would be required to comply with the recommendations included in an acoustical report prepared in accordance with City Acoustical Report Guidelines, the GP and CPU policies and other regulatory or guidance documents. Strict adherence to the Mitigation Framework detailed in NOI-4, which requires compliance with the City's Noise Abatement and Control Ordinance as noted above would reduce construction-related noise impacts, but not to below a level of significance. Even with strict adherence to the Mitigation Framework, these impacts cannot be reduced to below a level of significance and therefore, the impact remains significant and unavoidable.

5.11 Paleontological Resources

5.11.1 Existing Conditions

Paleontological resources (fossils) are the remains and/or traces of prehistoric animal and plant life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, leaves, and other fossils are found in the geologic deposits (rock formations) within which they were originally buried. Fossil remains are important as they provide indicators of the earth's chronology and history. They represent a limited, nonrenewable, and sensitive scientific and educational resource.

The following analysis is based on a review of available literature including the Geotechnical Report for the CPU (Geocon 2012), the City of San Diego Paleontological Guidelines (2002), and the County of San Diego Paleontological Resources by Walsh and Deméré (1994).

5.11.1.1 Paleontological Resource Potential

The potential for fossil remains at a given location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are entombed. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation. To evaluate paleontological resources in the CPU area, the presence and distribution of geologic formations and the respective potential for paleontological resources were reviewed.

Geologic formations are rated for paleontological resource potential according to the following scale (Deméré and Walsh 1994).

- High Sensitivity - These formations contain a large number of known fossil localities. Generally, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.

- Moderate Sensitivity - These formations have a moderate number of known fossil localities. Generally, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.

- Low and/or Unknown Sensitivity - These formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are presently no known paleontological resources but which have the potential for producing such remains based on their sedimentary origin.

- Very Low Sensitivity - Very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

According to the geotechnical evaluation prepared for the CPU (Geocon, Inc. 2012), geologic formations occurring in the CPU area include Very Old Paralic Deposits (Qvop) (formerly the Lindavista Formation), San Diego and Otay Formations, as well as undocumented fill, topsoil and slopewash, and alluvium.

The paleontological resource potential for each of these formations (Deméré and Walsh 1994) is shown on Figure 5.11-1 and discussed below. Other soils found in the CPU area (undocumented fills, topsoil, slopewash, and alluvium) are considered to have a low potential for paleontological resources.

a. Very Old Paralic Deposits (Qvop) (formerly the Lindavista Formation [Qln]) – Moderate Sensitivity

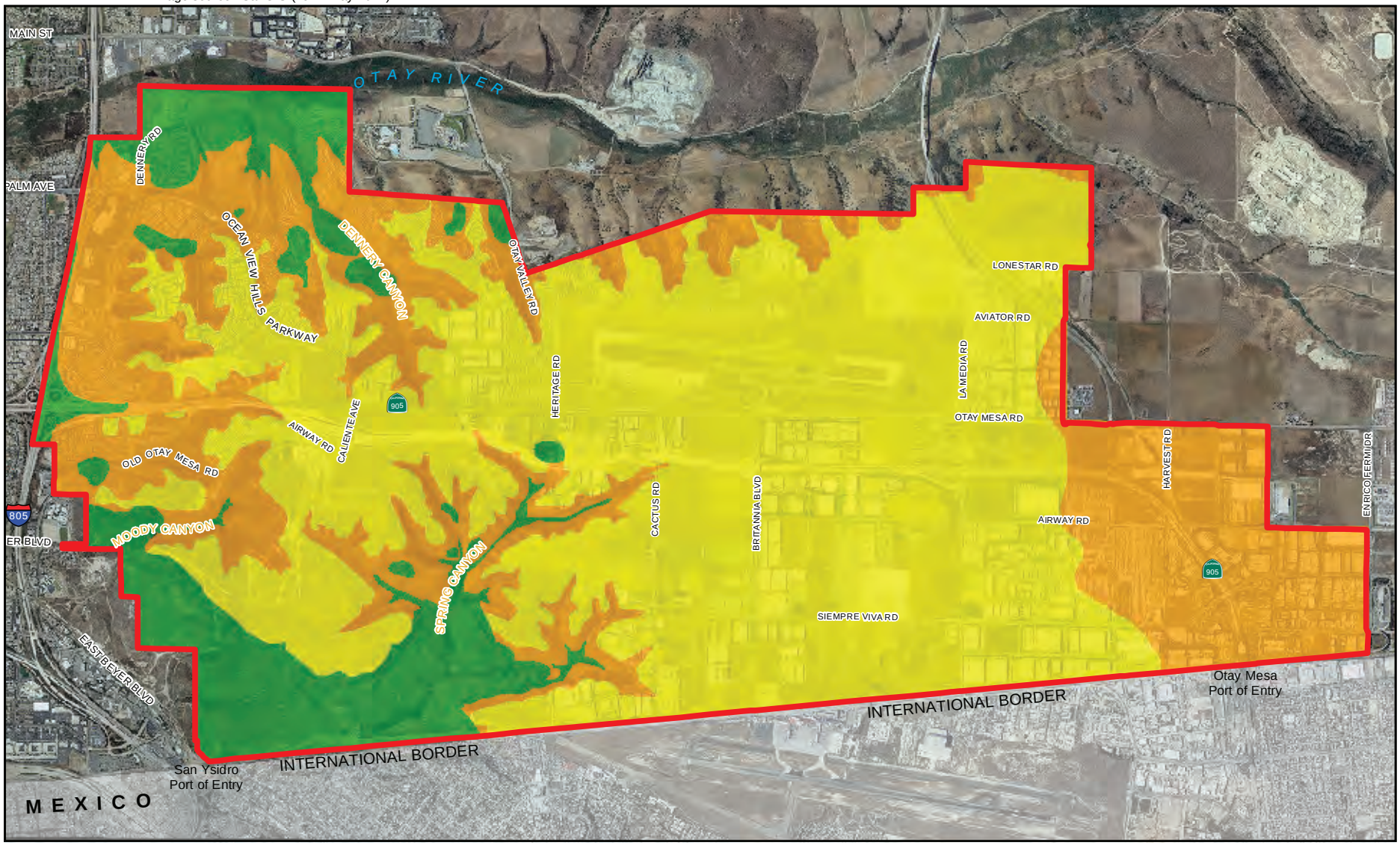
The Very Old Paralic Deposits (approximately one million years old) occur on areas of higher elevation (mesas, ridgelines) within the CPU area. Fossil localities are rare in this formation and have only been collected from a few areas. Fossils collected from these sites consist of remains of nearshore marine invertebrates including clams, scallops, snails, barnacles, and sand dollars. Based on the scarcity of fossils in the Very Old Paralic Deposits, this formation is assigned a “moderate” resource sensitivity.

b. San Diego Formation (Tsd) – High Sensitivity

The late Pliocene age (approximately 2.3 to 4 million years old) San Diego formation is exposed on the slopes of drainages, primarily in the western portion of the CPU area. The San Diego formation has rich fossil beds that have produced diverse assemblages of marine invertebrate and vertebrate fossils such as clams, scallops, snails, crabs, barnacles, sharks, rays, bony fishes, sea birds, dolphins, walrus, fur seal, and baleen whales. Rare remains of terrestrial mammals including cat, wolf, skunk, camel, antelope, deer, and horse have also been recovered from this formation. Also occurring in this formation is fossil wood and leaves including remains of pine, oak, laurel, cottonwood, and avocado.

Because of the extremely important remains of fossil marine mammals, sea birds, and mollusks recovered from the San Diego Formation, which are an important source of information on Pliocene marine organisms and environments, it is assigned “high” resource sensitivity.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Paleontological Sensitivity

- High (Tsd, To)
- Mod (Qvop)
- Low or Null (Qal, Qls, Qls?, Qt, Qya, Tmv, Qpf,)

0 Feet 4,000

FIGURE 5.11-1

Paleontological Resource Sensitivity

c. Otay Formation (To) – High Sensitivity

The Pliocene-age Otay Formation underlies the San Diego Formation in the CPU area. Numerous fossil localities have been discovered in the upper sandstone-mudstone unit and the middle grit stone unit, while no fossils have been recorded from the lower unit. Fossils from this formation include well-preserved remains of a diverse assemblage of terrestrial vertebrates such as tortoise, lizards, rabbit, dog, and fox. The upper sandstone portion of the Otay Formation has produced important vertebrate fossil remains and is assigned a "high" resource sensitivity. It is considered the richest source of late Oligocene terrestrial vertebrates in California. The lower portion of the Otay formation has produced vertebrate fossils from only a few localities; however, it is still assigned a "high" resource sensitivity in accordance with the City's Significance Determination Thresholds (City of San Diego 2011d).

5.11.1.2 Regulatory Framework

Pursuant to Section 15065 of the State CEQA Guidelines (California Code of Regulations Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment where the project has the potential to eliminate important examples of the major periods of California prehistory, which includes the destruction of significant paleontological resources.

According to City of San Diego Significance Determination Thresholds (2011), impacts to paleontological resources are considered potentially significant for areas with a high sensitivity if grading would exceed 1,000 cubic yards and extend over a depth of 10 feet, and for areas with moderate sensitivity if grading would exceed 2,000 cubic yards and extend over a depth of 10 feet. Additionally, impacts would be considered significant in areas of shallow grading where formational soils are exposed at the surface (i.e., as a result of previous grading) and where fossil localities have already been identified.

5.11.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, impacts related to paleontological resources would be significant if the CPU would:

1. Allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential.

5.11.3 Issue 1: Paleontological Resources

Would the CPU allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential?

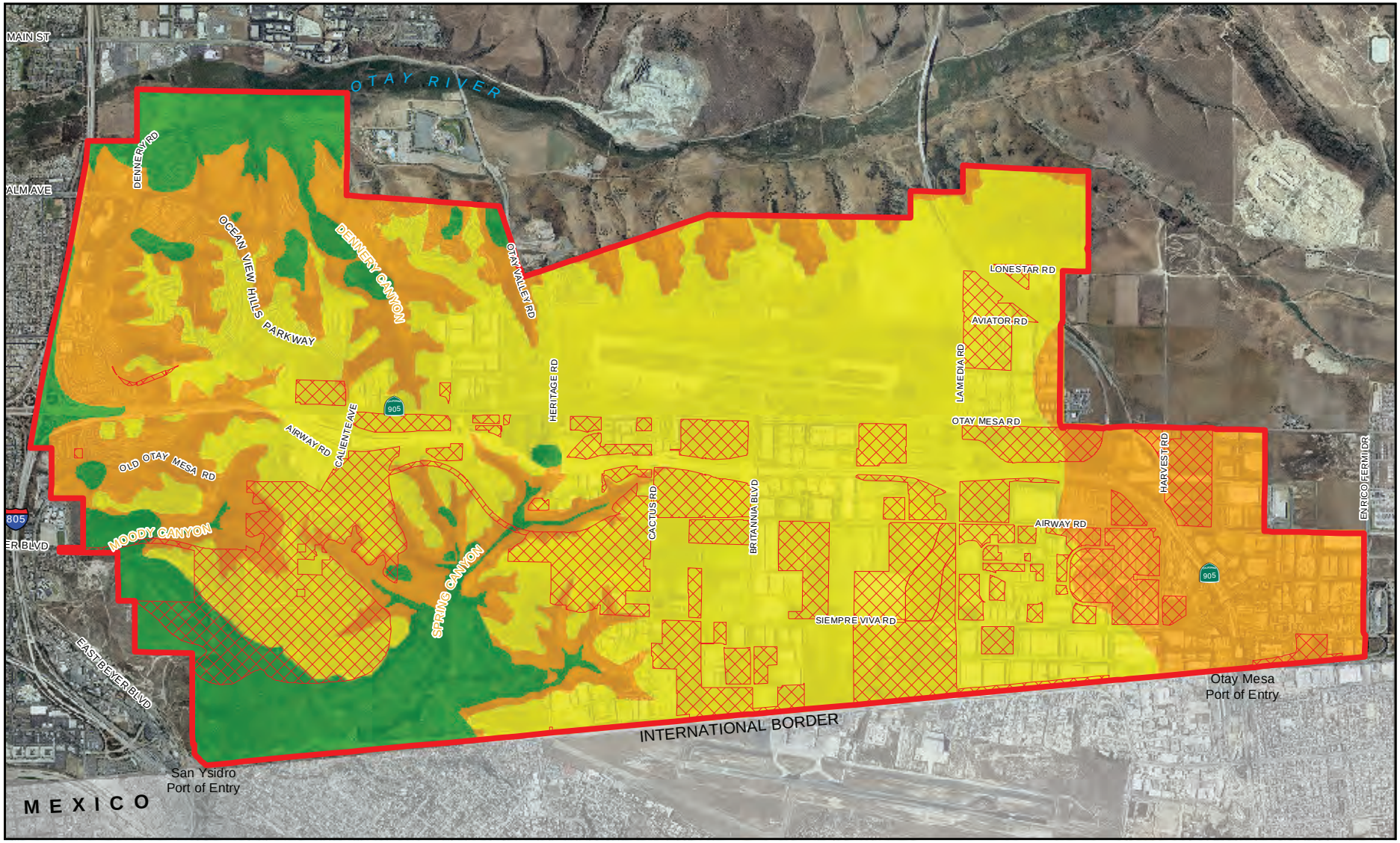
5.11.3.1 Impacts

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

Although grading information for future development within the CPU area cannot be determined at this time, a "worst case" scenario can be approximated. The "worst case" condition includes permanent disturbance (development and/or grading) of the entire CPU area with the exception of CPU open space preserve acreage. As shown in Figure 5.11-2, approximately 352 acres designated as high paleontological sensitivity, approximately 1,505 acres designated as moderate sensitivity, and less than 1 acre designated as low sensitivity would potentially be impacted by buildout of the CPU. Grading would exceed the depth and volume indicated in Table 5.11-1. As such, CPU implementation would result in grading that would impact fossil resources relevant to understanding earth's history, if the fossils are not recovered and salvaged.

Future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). This includes a requirement for submittal of a Paleontological Letter prepared by a qualified paleontologist in accordance with the City's Paleontological Guidelines that identifies the geologic formation information regarding fossil resource sensitivity and a determination that there are no paleontological resources present on the project site. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B. Both processes are further described in Section 3.0, Project Description.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Proposed CPU Impacts

Paleontological Sensitivity

High (Tsd, To)

Mod (Qvop)

Low or Null (Qal, Qls, Qls?, Qt, Qya, Tmv, Qpf,)

0 Feet 4,000

FIGURE 5.11-2

Paleontological Resource Impact Areas

5.11.3.2 Significance of Impacts

Implementation of the CPU has the potential to result in significant impacts to paleontological resources. Specifically, future projects implemented in accordance with the CPU that would involve substantial grading within the San Diego and Otay formations and Very Old Paralic Deposits would result in the loss of significant fossil remains. It should be noted however, that for future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.

TABLE 5.11-1
PALEONTOLOGICAL SIGNIFICANCE THRESHOLDS

Sensitivity Rating	Excavation Volume and Depth Thresholds
High	>1,000 cubic yards and >10 feet deep
Moderate	>2,000 cubic yards and >10 feet deep
Low-Zero	Mitigation not required

5.11.3.3 Mitigation Framework

For future development project types that are consistent with the OMCP, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources further detailed below.

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

I. Prior to Project Approval

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

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.

- Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.

- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

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

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

- Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).

- Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.

- Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological MMRP shall be implemented during construction grading activities.

5.11.3.4 Significance after Mitigation

Future development implemented in accordance with the CPU and the supplemental development regulations for CPIOZ Type A (ministerial) would not be required to incorporate the Mitigation Framework measures and alternatives adopted in conjunction with the certification of this PEIR. However, for future development subject to review under CPIOZ Type B (discretionary), implementation of the Mitigation Framework measures adopted in conjunction with the certification of this PEIR would be required. Therefore, the program-level impact related to paleontological resources would be reduced to below a level of significance.

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5.12 Transportation/Circulation

This section analyzes the potential transportation-related impacts associated with the adoption of the CPU. The study area boundaries for the purposes of the traffic analysis include the CPU area and extend to those areas outside the CPU area to roads that are common to other communities in the City of San Diego and other jurisdictions such as the City of Chula Vista and the County of San Diego. The analysis in this section is based on the Traffic Impact Analysis (TIA) prepared by Urban Systems Associates (USA), Inc. (June 14, 2012), which is contained in Appendix J.

Traffic analysis was conducted in support of the CPU in order to identify the recommended roadway classifications and other recommended transportation improvements to support buildout of the CPU land uses and proposed zoning, and to identify any significant traffic impacts that would remain unmitigated at the programmatic level.

Future traffic volumes were forecasted using SANDAG's Series 11 regional transportation model calibrated for the Otay Mesa area. Land uses within the CPU area were assumed to be built out within the traffic model. The CPU transportation model network included the future improvements from the Adopted Community Plan that were assumed to be completed at buildout of the CPU and included the Year 2030 Regional Transportation Plan "Reasonably Expected" projects in the region such as SR-11 and the SR-905/SR-125/SR-11 freeway interchange. Also, the model was modified to include a half-diamond interchange (instead of a full interchange) at SR-125/Lone Star Road and a portion of SR-125 was modeled as a toll facility.

Due to the undeveloped nature of much of the community, a majority of the circulation element roadways are not built, are only partially built, or are not operating near capacity. Therefore, for many facilities, an analysis of the CPU buildout traffic volumes on the existing transportation network was not possible or meaningful. So, although the existing condition is considered the baseline for identifying significant impacts, in order to identify the recommended roadway classifications and other transportation improvements, the proposed CPU land use buildout traffic volumes were initially analyzed on the CPU transportation network. Based on those level of service analysis results and other considerations, where possible, recommendations were made for the CPU roadway classifications, intersection lane configurations, and freeway and ramp improvements that would mitigate or reduce impacts by bringing the facilities to Level of Service D or better operation at buildout.

All but 24 potential roadway segment significant impacts would be mitigated at the programmatic level by incorporating the recommended roadway segment classifications (refer to Table 5.12-4 CPU Classification column) in the CPU Figure 3-2 Otay Mesa Roadway Classification Map and Public Facilities Financing Plan, and through future

development project review and implementation (ministerial and discretionary review through the CPIOZ). Further mitigation at the programmatic level is not recommended at the remaining 24 roadway segments due to various factors such as adjacency to environmentally sensitive land and/or steep slopes, existing development conflicts, and/or multi-modal and urban design context. At the project-level, partial mitigation may be possible in the form of transportation demand management (TDM) measures that encourage carpooling and alternate means of transportation. At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

All but 39 intersection significant impacts would be mitigated at the programmatic level by incorporating the intersection configurations (refer to Figures 5.12-4a. – 5.12-4g.) for the 53 intersections analyzed into the projects to be funded through the Public Facilities Financing Plan and through future development projects (ministerial and discretionary through the CPIOZ). Further mitigation at the programmatic level is not recommended at the 39 intersections that would continue to be significantly impacted after mitigation due to considerations such as adjacency to environmentally sensitive land, steep slopes, routes to schools, and multi-modal and urban design context, or because additional study would be required in order to make additional recommendations. At the project-level, partial mitigation may be possible in the form of TDM measures that encourage carpooling and alternate means of transportation. At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

Five freeway segments on SR- 905 would be significantly impacted by buildout of the CPU. Mitigation in the form of one HOV lane in each direction on SR- 905 would reduce impacts on all five segments, with three segments continuing to be significantly impacted. However, since funding for the HOV lanes is not programmed at this time and is not included in the PFFP, five freeway segment impacts would remain significant and unmitigated at the programmatic level. At the project- level, partial mitigation may be possible in the form of TDM measures that encourage carpooling and alternate means of transportation, or other improvements such as auxiliary lanes that would require further study. At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

Five ramp meters locations on SR- 905 would be significantly impacted by the CPU. At the project- level, partial mitigation may be possible in the form of TDM measures that encourage carpooling and alternate means of transportation or other improvements such as auxiliary lanes or adding a lane to the freeway onramp, that would require further study. At the time future discretionary development projects are proposed, project-specific traffic analyses would contain detailed recommendations.

5.12.1 Existing Conditions

The following section outlines traffic conditions and regulatory framework of the existing street network, including roadway segments, key intersections, freeway segments, mass transit routes, bikeways, and pedestrian facilities within the study area.

5.12.1.1 Regulatory Framework

Traffic conditions and transportation planning in San Diego County are guided by state, regional, and local agencies and their policies. Caltrans is responsible for enhancement and maintenance of state highways and interstate freeways. Any changes to state facilities or construction within state right-of-way require an encroachment permit from Caltrans. Regional transportation planning efforts are guided by the travel forecasting models run by SANDAG. Locally, each incorporated city, including the City of San Diego, along with the County of San Diego, has developed specific goals and policies for traffic conditions and roadways within their jurisdiction. Each agency is responsible for the implementation of its goals and policies.

a. City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems, (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

b. Otay Mesa Community Plan Transportation Element

The purpose of the adopted Otay Mesa Community Plan Transportation Element is to establish goals and policies to guide future street network and design, street classification, LOS, transit facilities and service, pedestrian and bicycle accommodations, and facility improvements needed to support future travel needs within the Community Plan area. This element would be replaced by the proposed Mobility Element of the CPU if adopted.

c. Regional Transportation Plan

SANDAG's 2050 RTP, adopted in October 2011, is the long-range mobility plan for the region. It includes short-term and long-term strategies for the development of an integrated multi-modal transportation system, and is required in order to be eligible for state and federal funding. The RTP identifies and prioritizes projects, and calls out

funding sources for their implementation. The 2050 RTP is developed around five primary components: a Sustainable Communities Strategy, Social Equity and Environmental Justice, Systems Development, Systems Management, and Demand Management. It addresses improvements to transit, rail, roadways, goods movement, bicycling, and walking, as well as other topics. The RTP Sustainable Communities Strategy (SCS), consistent with Senate Bill 375, shows how integrated land use, housing, and transportation planning can lead to lower greenhouse gas emissions from autos and light trucks. The RTP is intended to support a regional smart growth plan. This vision reflects a transportation system that supports a robust economy and a healthy and safe environment with climate change protection while providing a higher quality of life for San Diego County residents. This includes better activity centers with homes and jobs enabling more people to use transit and walk and bike; efficiently transporting goods; and providing effective transportation options for all people. It should be noted that the PEIR prepared for the RTP and SCS is the subject of ongoing litigation (as of printing of this PEIR).

d. Bicycle Master Plan

The City's Bicycle Master Plan (City of San Diego 2002) seeks to foster a bicycle-friendly environment to serve commuter and recreational riders. The plan is currently undergoing an update and identifies policies, routes, programs, and facility priorities to increase bicycle transportation, safety, access, and quality of life. Similar to improved pedestrian environments and routes, improved bicycle routes can increase ridership, which provides community and regional benefits (reduced traffic congestion, energy consumption, vehicle emissions, etc.). The development, maintenance, and support of a bicycle network addressed in the Bicycle Master Plan were considered in the Mobility Element of the General Plan (City of San Diego 2008).

e. Level of Service Criteria

The Level of Service (LOS) criteria used in this analysis is based on the City of San Diego Traffic Impact Study Manual (1998). LOS provides a quantitative measure of certain traffic criteria (speed, travel time, comfort, etc.) that represent a transportation facility quality of service from a traveler's perspective. A vehicle level of service definition generally describes these conditions in terms of such factors as speed, travel time, freedom to maneuver, comfort, convenience, and safety. LOS A represents the best operating conditions from a driver's perspective (primarily free-flow operation), while LOS F represents the worst case where traffic flow is at extremely low speed. Per the City criteria, intersections and roadway segments operating at a LOS D or better are considered acceptable under both direct and cumulative conditions. LOS criteria for roadway segments, intersection, and freeways are discussed below.

Roadway Segments

The roadway level of service standards and thresholds that the City of San Diego uses provide the basis for analyzing arterial roadway segment performance. The analysis of roadway segment level of service is based on the functional classification of the roadway, the maximum desirable capacity, roadway geometrics, and existing or forecasted average daily traffic (ADT) volumes. The actual capacity of roadway facilities can vary due to a number of actual characteristics including, but not limited to, pavement width, frequency of cross streets and driveways, intersection signal timing, geometry, and on-street parking. The actual functional capacity is typically based on the ability of arterial intersections to accommodate peak hour volumes. LOS D is considered acceptable for roadway segments.

Intersections

Intersection analysis, per the Highway Capacity Manual (HCM; Transportation Research Board 2010), varies for signalized intersections and unsignalized intersections. The intersection analysis considers lane width, on-street parking, conflicting pedestrian flow, traffic composition (i.e., percent of trucks) and shared lane movements (e.g., through and right-turn movements from the same lane). LOS for signalized intersections is based on the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay. The LOS for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. At an all-way stop controlled intersection, the delay reported is the average control delay of the intersection. At a one-way or two-way stop controlled intersection, the delay reported represents the worst movement, typically the left runs from the minor street approach. The threshold of LOS D, a delay of 55 seconds per vehicle is considered acceptable for signalized intersections and a delay of 35 seconds per vehicle at LOS D is considered acceptable for unsignalized intersections.

Freeway Segments

Freeway segments are analyzed using standard Caltrans methodologies. The procedures for determining freeway LOS involve calculating a peak hour volume to capacity ratio (V/C). Peak hour volumes are estimated from the application of design hour (“K”), directional (“D”) and truck (“T”) factors to ADT volumes. The truck factors (percent trucks) are obtained from historic Caltrans data, local truck counts, and projections of future volumes at the border crossings. The resulting V/C ratio is then compared with accepted ranges of V/C values corresponding to the various LOS. The corresponding LOS represents an approximation of existing or forecasted freeway operating conditions during the peak hour. Caltrans has developed four levels of freeway congestion within LOS F, ranging from F(0) (considered congestion) to F(3) (gridlock).

Any facility operating at LOS E (0.93 to 1.00 V/C) or F (over 1.01 V/C) is considered an unacceptable LOS.

Freeway Ramp Metering

Freeway ramp meters are considered to operate acceptably if the vehicle delay is less than 15 minutes. If the vehicle delay exceeds 15 minutes at a freeway on-ramp meter and the downstream freeway is operating at LOS E or F, the delay is considered unacceptable.

5.12.1.2 Existing Circulation System

Much of the land in the CPU area is undeveloped. Only the developed residential areas on the western side of the CPU area have consistently improved roads created through a comprehensive funding and phasing system. Roads in the rest of the CPU area have been improved incrementally as property frontages have developed. Therefore, much of the street system is unconnected and incomplete.

I-805 and SR-125 provide regional north-south access to Otay Mesa. SR-125, known as the South Bay Expressway, provides an extension of SR-125 from SR-54 in Spring Valley to SR-905. The South Bay Expressway is operated as a toll road by SANDAG.

SR-905, Otay Mesa Road, and Palm Avenue provide east-west connections from the CPU area to I-805. SR-905 provides connection from the Otay Mesa POE and CPU area surface streets with regional freeway I-805. At the time of the existing conditions analysis, a 4.5-mile portion of SR-905 was a conventional highway (Otay Mesa Road). The SR-905 freeway was recently completed within the CPU area and was opened to traffic in July 2012. The existing conditions analysis is based on data collected before the SR-905 freeway was opened to traffic from Britannia Boulevard to the international border.

a. Key Freeways and Roadways

The following are general descriptions of key roadways within the community divided into three categories: roads that provide access to and from the community, roads within residential areas, and roads within industrial areas. Also, the major truck routes utilized to transport goods are listed below.

Community Access Freeways and Roads[1]

I-805 – is a north-south freeway that starts from approximately three-quarters of a mile north of the U.S.-Mexico border, extends through San Diego, Chula Vista, National City, and connects to I-5 in Sorrento Valley. This freeway is located to the west of the CPU area and contains ramps to SR-905. Near the CPU area, this freeway is four lanes at its southern origination point to eight lanes further north.

SR-905 – a six-lane freeway that extends into Otay Mesa for a mile from its interchange with I-805 and transitions into Otay Mesa Road, a six-lane Primary Arterial for approximately 4.5 miles where it connects to another one-mile freeway portion that ends at the Port of Entry.

SR-125 – is a north-south freeway located to the east of the CPU area extending from Otay Mesa Road at approximately 1.25 miles north of the U.S.-Mexico border north to SR-52. It provides a connection between Otay Mesa, Chula Vista, Spring Valley, Lemon Grove, La Mesa, San Diego, and Santee. The southern segment between Otay Mesa Road and SR-54 is a four-lane toll road called the South Bay Expressway.

Old Otay Mesa Road – a two-lane Collector (without left-turn lane) connecting Otay Mesa with San Ysidro. It extends along the rim of a canyon and intersects with SR-905/Otay Mesa Road.

Del Sol Boulevard – a four-lane Collector (with left-turn lane) as it crosses under I-805 from Otay Mesa-Nestor. It intersects Dennery Road and then continues for approximately a quarter-mile as a two-lane Collector (with left-turn lane).

Palm Avenue – crosses over I-805 from Otay Mesa-Nestor on a four-lane bridge with double left-turn-lanes at the interchange of Palm Avenue and I-805. Palm Avenue transitions to a six-lane Primary Arterial, and intersects with Dennery Road.

Otay Valley Road – a six-lane major road, Main Street, at I-805 in the City of Chula Vista. Otay Valley Road crosses the Otay River on a two-lane bridge with a center turn lane and continues as a two-lane Collector (without left-turn lane) into the City of San Diego.

Otay Mesa Road – from the terminus of SR-905, Otay Mesa Road is constructed as a six-lane Primary Arterial to Otay Center Road. It is constructed as a seven-lane Major

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[1]Note that this section describes the existing conditions assumed in the traffic impact analysis (Appendix J). Additional improvements may currently be in place, such as the SR-905 freeway improvements.

Arterial between Otay Center Road and La Media Road. It transitions to a four-lane Major Arterial east of La Media Road and intersects with the SR-125 southbound off-ramp and northbound on-ramp, and continues east into County of San Diego lands.

Otay Mesa Border Crossing and Port of Entry – a second border crossing between the U.S. and Mexico located at the southeast corner of Otay Mesa. This POE allows automobiles but is primarily used for truck traffic, which is predominant throughout the community of Otay Mesa.

Roads within Residential Areas

Dennery Road – is constructed as a four-lane Major Arterial between Del Sol Boulevard and Palm Avenue. North of Palm Avenue, the road transitions to a four-lane Collector (with left-turn lane) and eventually transitions to a two-lane Collector (without fronting property).

Ocean View Hills Parkway – is a four-lane Major Arterial road extending from Dennery Road to Del Sol Boulevard. South of Del Sol Boulevard this roadway is constructed as a six-lane Major Arterial and intersects with conventional highway SR-905/Otay Mesa Road.

Avenida de las Vistas – is a two-lane Collector (without fronting property) extending west of Otay Valley Road. The residential development along Avenida de las Vistas can be accessed via Otay Valley Road to the north or Otay Mesa Road from the south.

Caliente Avenue – is a partially built four-lane Major Arterial extending south from Otay Mesa Road, intersecting with Airway Road. This segment will be constructed as six lanes as part of the SR-905 interchange currently under construction at this location.

Beyer Boulevard – is a four-lane Major Arterial extending from Old Otay Mesa Road westerly into the San Ysidro Community Plan area, and provides access to the nearby Beyer Boulevard transit station.

Roads Within Industrial Areas

Airway Road – is an east-west, partially built roadway varying in width that runs parallel with Otay Mesa Road from Britannia Boulevard to the County boundary. The western segment of Airway Road is a three-lane Collector (2 lanes eastbound, 1 lane westbound) between Old Otay Mesa Road and Caliente Avenue, and provides access to San Ysidro High School.

Siempre Viva Road – is an east-west, partially built roadway varying in width between Cactus Road and La Media Road. East of La Media Road, Siempre Viva Road is a six-lane Primary Arterial with an interchange at SR-905 and then transitions to a four-lane Major Arterial from Paseo de las Americas to the County boundary.

Heritage Road – is a north-south, partially built roadway varying in width from Otay Valley Road to its terminus south of Gateway Park Drive.

Cactus Road – is a north-south, four-lane Collector (with left-turn lane) south of Otay Mesa Road, ending at the SR-905 right-of-way. South of SR-905 it is partially constructed with two lanes.

Britannia Boulevard – is a north-south, partially built Major Arterial roadway extending between Otay Mesa Road and Siempre Viva Road. The SR-905 interchange is under construction between Otay Mesa Road and Airway Road. South of Airway Road, portions are built as a four-lane Major Arterial, while some segments are only constructed to half-width.

La Media Road – is a north-south, partially built Major Arterial extending from north of Otay Mesa Road to Siempre Viva Road. The SR-905 interchange is under construction between Otay Mesa Road and Airway Road. South of Airway Road only two lanes are built, extending to a truck only road extending to the east Otay Mesa inspection facility. This road is currently the designated southbound truck route for laden (carrying cargo) trucks from conventional highway SR-905/Otay Mesa Road to the east Otay Mesa inspection facility.

Truck Routes

Truck routes within the CPU area are an important component of the circulation system. The Otay Mesa POE provides a major commercial truck transport point between the U.S. and Mexico. From the POE, trucks travel to the warehouses/distribution facilities within the CPU area and to major freeways for further distribution. Currently, the major truck routes utilized to transport goods include SR-905, SR-125, La Media Road, Siempre Viva Road, Britannia Boulevard, and Otay Mesa Road. These roads are described above. Drucker Lane is a minor roadway utilized as a truck route connection between Siempre Viva Road and La Media Road. This roadway is five lanes at the intersection of Siempre Viva Road, and four lanes from just south of that intersection to Kern Street, and is reduced down to one southbound lane between Kern Street and La Media Road. Truck traffic heading to Mexico through the Otay Mesa POE typically queue on Drucker Lane and La Media Road.

b. Key Intersections

There are 15 key intersections within the study area under the existing conditions, which are as follows:

1. Palm Avenue/I-805 SB Ramps
2. Palm Avenue/I-805 NB Ramps
3. Palm Avenue/Dennery Road

4. Otay Mesa Road/Caliente Avenue
5. Otay Mesa Road/Corporate Center Drive
6. Otay Mesa Road/Heritage Road
7. Otay Mesa Road/Cactus Road
8. Otay Mesa Road/Britannia Boulevard
9. Otay Mesa Road/La Media Road
10. Otay Mesa Road/Piper Ranch Road
11. Otay Mesa Road/SR-125 SB Off-ramp
12. Otay Mesa Road/SR-125 NB On-ramp

13A. Siempre Viva Road/SR-905 SB Ramps
13B. SR-905 SB Off-ramp to WB Siempre Viva Road (unsignalized)
14. Siempre Viva Road /SR-905 NB Ramps

All of these intersections are currently signalized with the exception of 13B.

5.12.1.3 Existing Traffic Volumes

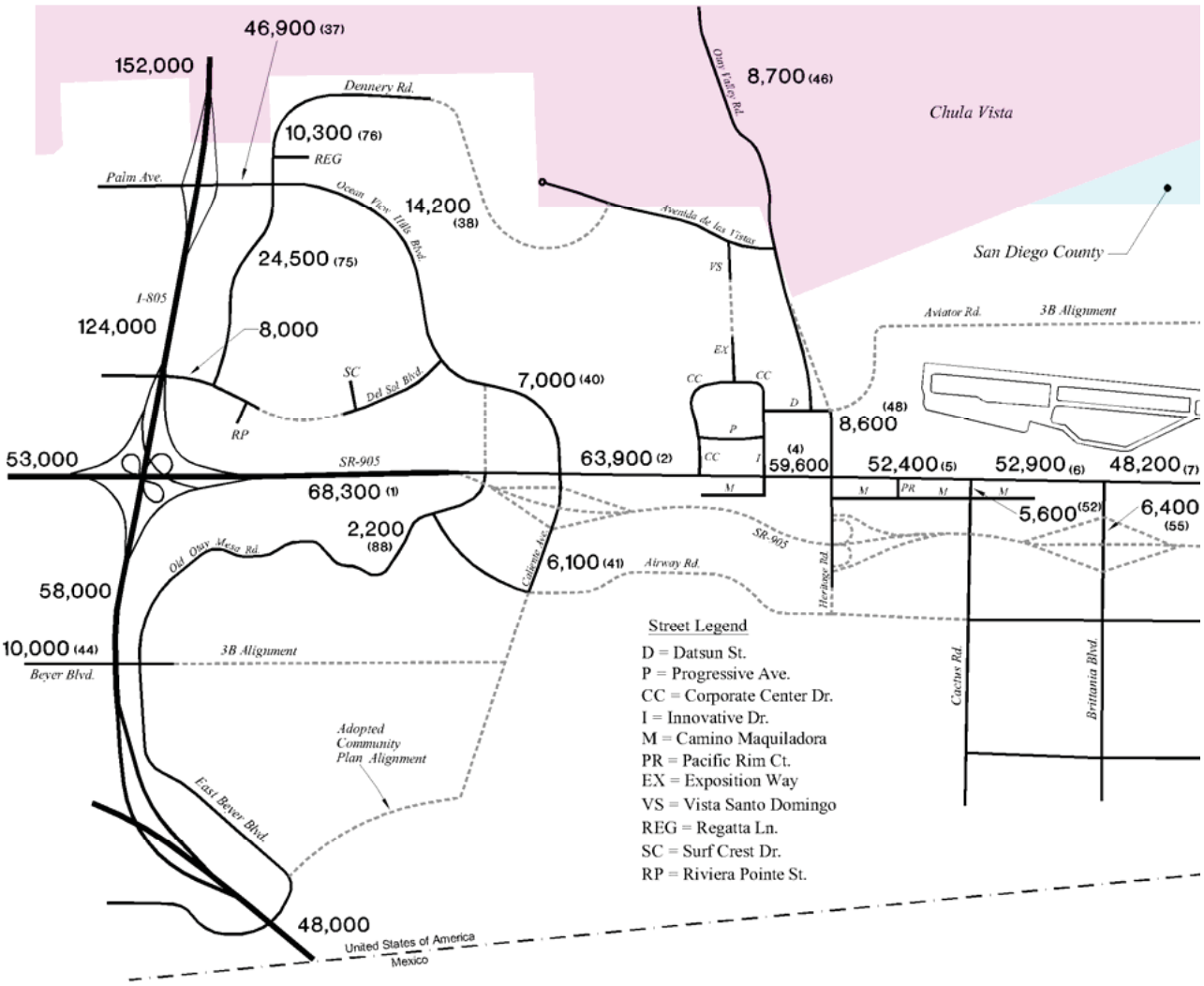
Existing traffic volumes are based on recent traffic counts (2005 to 2010) conducted by Caltrans, the City of San Diego, or recently counted for other project study purposes. It is noted that traffic volumes were obtained before the opening of SR-905 Phase 1-A improvements from the partial Britannia Boulevard interchange to east of the La Media Road partial interchange. Due to the high number of trucks utilizing CPU area roadways compared to typical San Diego communities, the truck percentage of vehicular traffic assumed in the analysis summarized below was increased from the typical 2 percent to 10 percent.

a. Roadway Segments

The existing ADT volumes for road segments within the CPU area are shown in Figures 5.12-1a and 5.12-1b. Table 5.12-1 shows existing street segment LOS based on the City of San Diego Traffic Impact Manual. As shown, all roadway segments except the following seven operate at an acceptable LOS D or better:

1. Otay Mesa Road from SR-905 to Caliente Avenue (LOS F)
2. Otay Mesa Road from Caliente Avenue to Corporate Center Drive (LOS F)
3. Otay Mesa Road from Corporate Center Drive to Heritage Road (LOS E
4. Otay Mesa Road from Otay Mesa Center Road to La Media Road (LOS E)
5. Heritage Road/Otay Valley Road from Main Street to Avenida de las Vistas (LOS F)
6. Heritage Road/Otay Valley Road from Avenida de las Vistas to Otay Mesa Road (LOS F)
7. La Media Road from Airway Road to Siempre Viva Road (LOS F)

Map Source: Urban Systems Associates, Inc. 2012



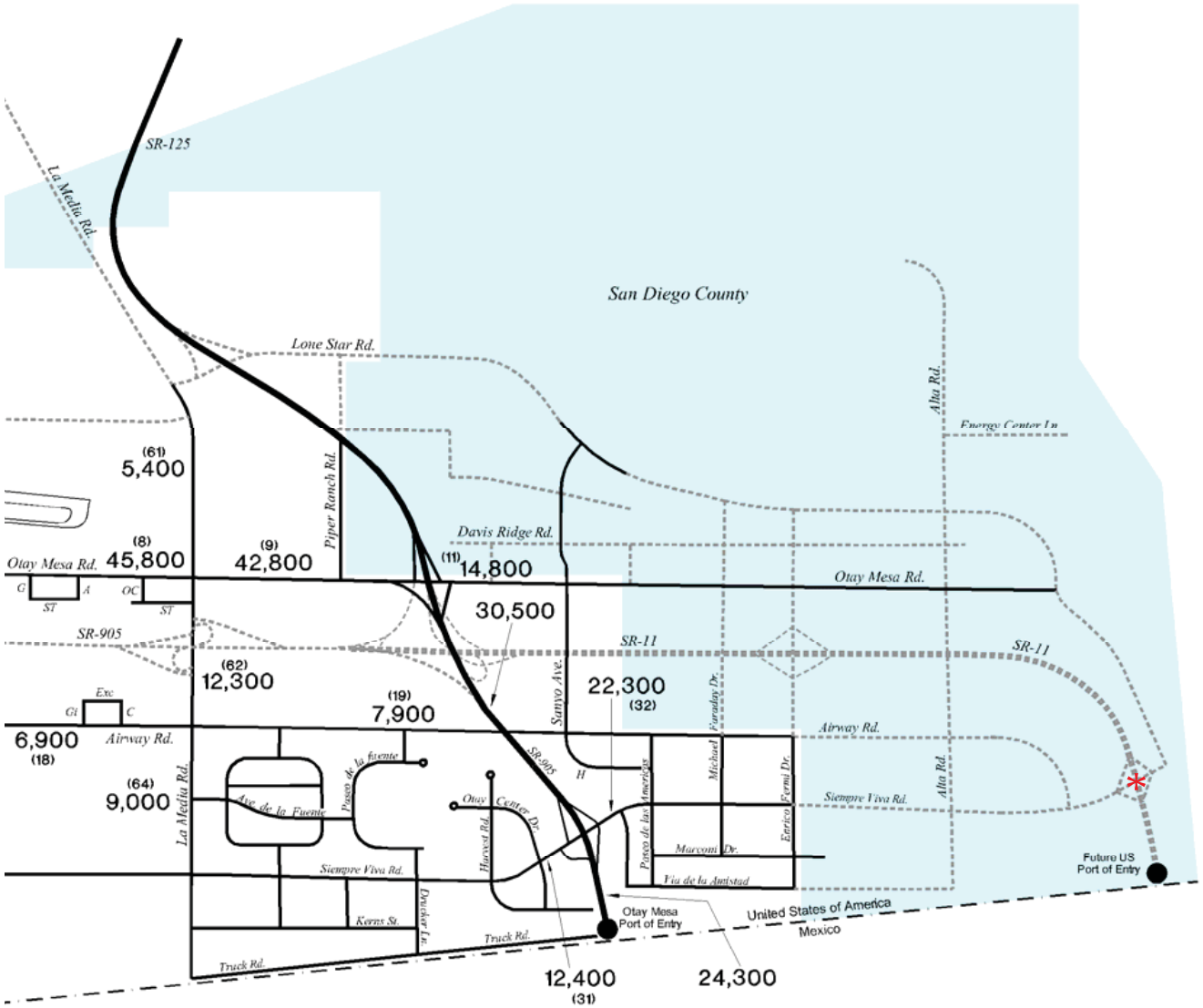
(XX) = Segment number, coincides with Buildout segment numbers.

Not to Scale

FIGURE 5.12-1a

Existing Condition Roadway Segment Volumes (West)

Map Source: Urban Systems Associates, Inc. 2012



Street Legend

OC = Otay Mesa Ctr. Rd.
G = Gailes Blvd.
A = Ailsa Ct.
ST = St. Andrews Ave.
H = Heinrich Hertz Dr.
C = Centurion St.
Gi = Gigantic St.
Exc = Excellante St.

(XX) = Segment number, coincides with Buildout segment numbers.

* - Refer to the Caltrans SR-11 and Otay Mesa POE Final Tier II EIR/EIS, March 2012 for the preferred alternative.

Not to Scale

FIGURE 5.12-1b

Existing Condition Roadway Segment Volumes (East)

TABLE 5.12-1
EXISTING SEGMENT OPERATIONS

Street Segment	Class	LOS E ADT	Existing ADT	V/C	LOS
Otay Mesa Road					
SR-905 to Caliente Ave.	6-PA	60,000	68,300	1.14	**F**
Caliente Ave. to Corporate Center Dr.	6-PA	60,000	63,900	1.07	**F**
Corporate Center Dr. to Heritage Rd.	6-PA	60,000	59,600	0.99	**E**
Heritage Rd. to Cactus Rd.	6-PA	60,000	52,400	0.87	D
Cactus Rd. to Britannia Blvd.	6-PA	60,000	52,900	0.88	D
Britannia Blvd. to Otay Mesa Center Rd.	6-PA	60,000	48,200	0.80	C
Otay Mesa Center Rd. to La Media Rd.	7-M	55,000	45,800	0.84	**E**
La Media Road to SR-125 SB Ramps	5-PA	55,000	42,800	0.78	C
SR-125 NB Ramps to Sanyo Ave.	4-M	40,000	14,800	0.37	A
Airway Road					
Britannia Blvd. to La Media Rd.	2-CL	15,000	6,900	0.46	B
La Media Rd. to Sanyo Ave.	2-CL	15,000	7,900	0.53	C
Siempre Viva Road					
Harvest Rd. to SR-905 SB Ramps	6-PA	60,000	12,400	0.21	A
SR-905 NB Ramps to Paseo de las Americas	6-PA	60,000	22,300	0.37	A
Palm Avenue					
I-805 NB Ramps to Dennery Rd.	6-PA	60,000	46,900	0.78	C
Ocean View Hills Parkway					
Dennery Rd. to Del Sol Blvd.	4-M	40,000	14,200	0.36	A
Del Sol Blvd. to Otay Mesa Rd.	6-M	50,000	7,000	0.14	A
Caliente Avenue					
Otay Mesa Rd. to Airway Rd.	4-M	40,000	6,100	0.15	A
Old Otay Mesa Road					
Otay Mesa Rd. to Airway Rd.	2-C	8,000	2,200	0.28	A
Beyer Boulevard					
Smythe Ave. to Old Otay Mesa Rd.	4-M	40,000	10,000	0.24	A
Heritage Road/Otay Valley Road					
Main St. to Avenida De Las Vistas	2-C	8,000	8,700	1.09	**F**
Avenida De Las Vistas to Otay Mesa Rd.	2-C	8,000	8,600	1.08	**F**
Cactus Road					
Otay Mesa Rd. to SR-905	4-CL	30,000	5,600	0.19	A
Britannia Boulevard					
Otay Mesa Rd. to Airway Rd.	4-M	40,000	6,400	0.16	A
La Media Road					
North of to Otay Mesa Rd.	2-CL	15,000	5,400	0.36	B
Otay Mesa Rd. to Airway Rd.	2-CL	15,000	12,300	0.82	D
Airway Rd. to Siempre Viva Rd.	2-C	8,000	9,000	1.13	**F**
Dennery Road					
Palm Ave. to Regatta Ln.	4-M	40,000	10,300	0.26	A
Palm Ave. to Walmart Dr.	4-M	40,000	24,500	0.61	C
Del Sol Boulevard					
West of Dennery Rd.	4-C	15,000	8,000	0.53	C

SOURCE: Appendix J (Urban Systems Associates, Inc.)

Shade/Bold = Unacceptable LOS; 7-M = 7-Lane Major Arterial; 6-PA = 6-Lane Primary Arterial; 6-M = 6-Lane Major; 4-M = 4-Lane Major; 5-PA = Lane Primary Arterial; 4-CL = 4-Lane Collector (With Left-Lane Turn Lane); 4-C = 4-Lane Collector (Without Left-Turn Lane); 2-CL = 2-Lane Collector (With Left-Turn Lane); and 2-C = 2-Lane Collector (Without Left-Turn Lane, Industrial Fronting).

b. Intersections

Existing intersection LOS is shown in Table 5.12-2 and Figures 5.12-2a and 5.12-2b. All intersections currently operate at LOS D or better during the AM and PM peak hour periods except at the one following location:

1. Otay Mesa Road/Heritage Road (LOS E in the AM peak hour)

TABLE 5.12-2
EXISTING INTERSECTION LEVELS OF SERVICE

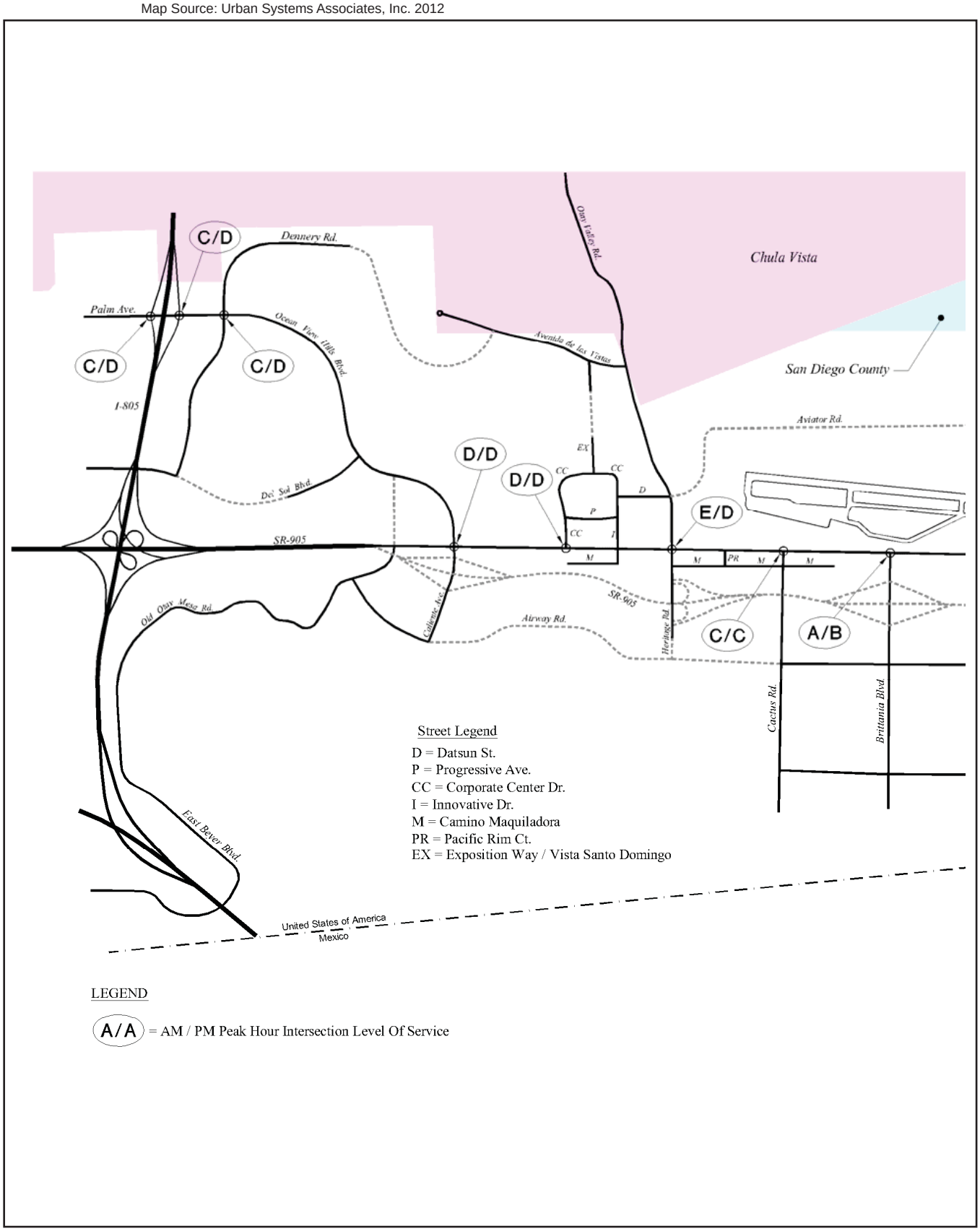
	Intersection	AM Peak Hour		PM Peak Hour	
		Delay	LOS	Delay	LOS
1	Palm Ave./I-805 SB Ramps	27.5	C	45.4	D
2	Palm Ave./I-805 NB Ramps	33.4	C	51.0	D
3	Palm Ave./Dennery Rd.	34.9	C	37.9	D
4	Otay Mesa Rd./Caliente Ave.	44.4	D	40.2	D
5	Otay Mesa Rd./Corporate Center Dr.	35.7	D	35.0	D
6	Otay Mesa Rd./Heritage Rd.	60.5	**E**	42.6	D
7	Otay Mesa Rd./Cactus Rd.	33.4	C	31.6	C
8	Otay Mesa Rd./Britannia Blvd.	7.3	A	11.4	B
9	Otay Mesa Rd./La Media Rd.	15.8	B	43.2	D
10	Otay Mesa Rd./Piper Ranch Rd.	8.3	A	9.4	A
11	Otay Mesa Rd./SR-125 SB Off-Ramp.	7.6	A	3.7	A
12	Otay Mesa Rd./SR-125 NB On-Ramp	0.8	A	3.2	A
13A	Siempre Viva Rd./SR-905 SB Ramps	16.1	B	11.6	B
13B	SR-905 SB Off Ramp to WB Siempre Viva Rd.	14.3	B	14.4	B
14	Siempre Viva Rd./SR-905 NB Ramps	14.5	B	14.6	B

SOURCE: Appendix J (Urban Systems Associates, Inc. 2012).
Delay = Control Delay in seconds
LOS = Level of Service
Shade/Bold = Unacceptable LOS

c. Freeway Segments

Existing ADT and LOS for freeway segments within the CPU area are shown in Table 5.12-3. As shown, all freeway segments currently operate at an acceptable LOS D or better.

Map Source: Urban Systems Associates, Inc. 2012

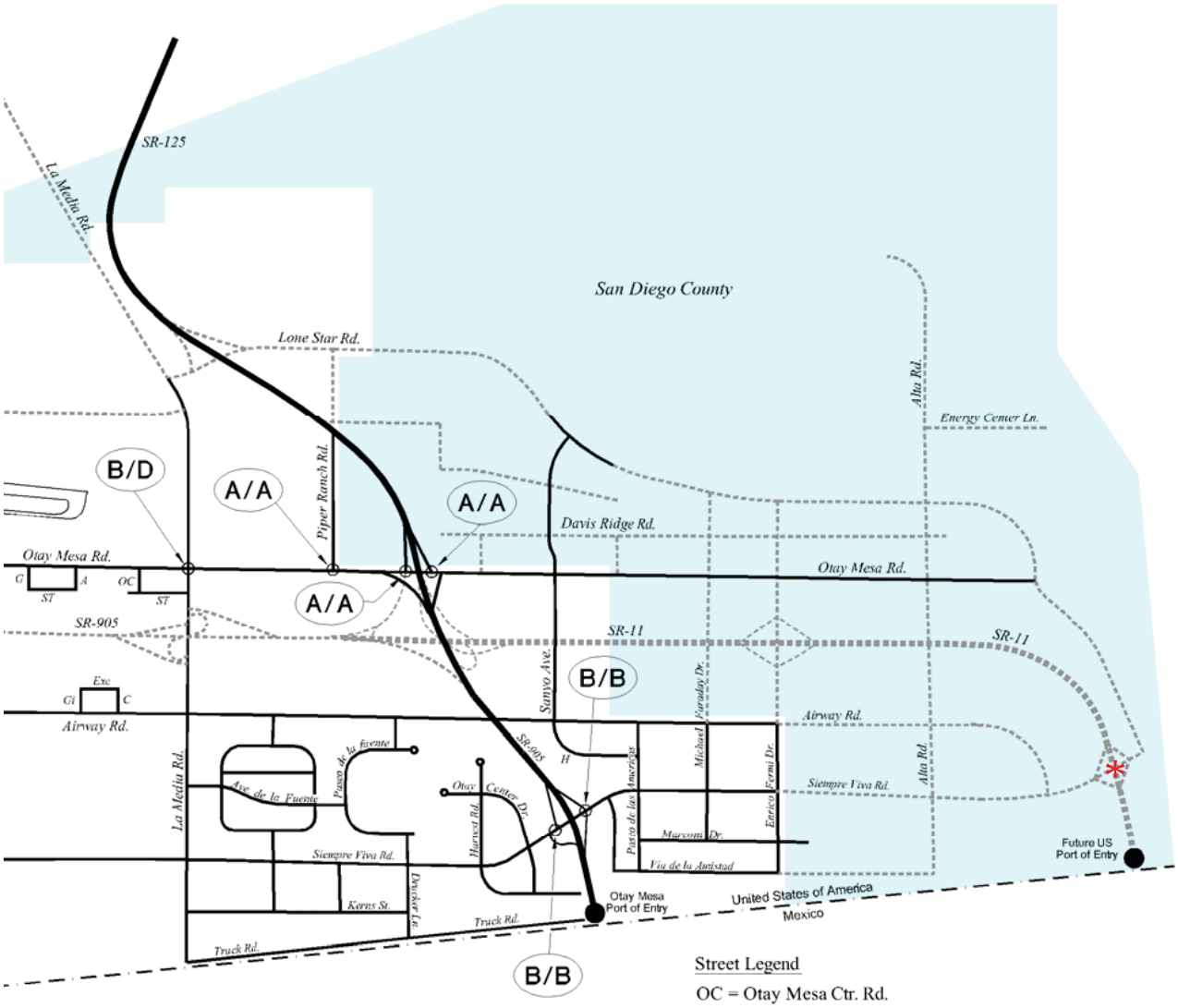


Not to Scale

FIGURE 5.12-2a

Existing Condition Intersection LOS (West)

Map Source: Urban Systems Associates, Inc. 2012



Street Legend

OC = Otay Mesa Ctr. Rd.
G = Gailes Blvd.
A = Ailsa Ct.
ST = St. Andrews Ave.
H = Heinrich Hertz Dr.
C = Centurion St.
Gi = Gigantic St.
Exc = Excellante St.

LEGEND

A/A = AM / PM Peak Hour Intersection Level Of Service

* - Refer to the Caltrans SR-11 and Otay Mesa POE Final Tier II EIR/EIS, March 2012 for the preferred alternative.

Not to Scale

FIGURE 5.12-2b

Existing Condition Intersection LOS (East)

TABLE 5.12-3
EXISTING FREEWAY SEGMENT LEVELS OF SERVICE

Freeway Segment	Lanes (1-Way)	Capacity	ADT	Peak Volume	V/C	LOS
Interstate 805						
Otay Valley Rd. - Palm Ave.	4+AUX	11,200	152,000	8,107	0.72	C
Palm Ave. - SR-905	4	9,400	124,000	6,613	0.70	C
SR-905 - San Ysidro Blvd.	4	9,400	58,000	3,093	0.33	A
SR-905						
Picador Blvd. - I-805	2	4,700	53,000	2,827	0.60	B
I-805 – Caliente Ave.	2	4,700	58,300	3,109	0.66	C
Otay Mesa Rd. - Siempre Viva Rd.	2	4,700	30,500	1,600	0.34	A
Siempre Viva Rd. – Border	3	4,700	24,300	1,296	0.28	A

SOURCE: Appendix J (Urban Systems Associates, Inc. 2012).
ADT = average daily traffic; V/C = volume-to-capacity ratio; LOS = level of service

5.12.1.4 Alternative Transportation

a. Transit

Within the CPU area, transit services are provided by the MTS. The northwestern part of the CPU area is served by bus routes 933/934 (MTS 2011). The routes travel to and from Del Sol Boulevard to Dennery Road to Palm Avenue into and out of the community. These routes serve the shopping centers along Dennery Road, the medical offices on Palm Avenue and Dennery Road, and the residences within this area. The eastern portion of the community is served by bus routes 905 and 905A. Bus route 905 provides regular service through the CPU area along Otay Mesa Road and SR-905. Bus route 905A provides limited service from Otay Mesa Road to SR-905 via Britannia Boulevard, Airway Road, La Media Road, and Siempre Viva Road with stops at Airway Road and Britannia Boulevard and Siempre Viva Road and Drucker Lane.

The Blue Line Trolley, which is outside of the CPU boundary, travels along the east side of I-5 within the neighboring community of San Ysidro and terminates at the San Ysidro Transit Center located at the U.S.-Mexico International Border.

b. Bikeways

The American Association of Highway and Transportation (AASHTO) and Caltrans have developed design standards for bikeways. The Caltrans Highway Design Manual, Chapter 1000: Bikeway Planning and Design, serves as the official standard for all bicycle facilities in California. While all roadways are open to bicycle travel unless it is specifically prohibited, the California Highway Design Manual establishes three classifications of facilities specifically for bicycle traffic. Based on the Otay Mesa Existing Conditions Report (City of San Diego 2004), there are Class II bikeways along Old Otay Mesa Road, portions of SR-905, Dennery Road, Ocean View Hills Parkway, Del Sol Boulevard, portions of Siempre Viva Road, Heinrick Hertz, Paseo de las

Americas, a portion of Enrico Fermi Drive, and Roll Drive within the CPU area. Per the City Street Design Manual, a Class II bikeway should be between 5 and 6 feet in width, and may be 4 feet in width when abutting a mandatory right-turn lane, with signs and pavement markings (City of San Diego 2002). Informal trails exist throughout the CPU area and are used by recreational bicyclists as well. These informal bikeways are not designated trails and often travel through private property.

c. Pedestrian Facilities

Sidewalk requirements for the City of San Diego are established through the Street Design Manual (City of San Diego 2002). The design requirements include a minimum 5-foot sidewalk, curb ramps at intersections, and compliance with the Americans with Disabilities Act (ADA). Sidewalks are generally required on both sides of streets. Sidewalks exist within the residential developments in the western CPU area. The majority of the commercial and industrial developments completed within the last 10 years provided sidewalks along their frontage roadways. However, sidewalks do not exist on many of the streets fronted by older developments and vacant properties. Informal trails exist throughout the CPU area, which are used by pedestrians but, as mentioned above, these trails are not designated and often are on private property.

5.12.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, impacts related to traffic and circulation would be significant if the CPU would:

1. Result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system;

2. Result in an increase in traffic hazards for motor vehicles, bicyclists, or pedestrians;

3. Create alterations to present circulation movements in the area including effects on existing public access points; or

4. Conflict with the adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.).

For this programmatic analysis, the CPU would result in a significant impact if a roadway segment, intersection, freeway segment, or freeway ramp meter would operate unacceptably in the Horizon Year Plus CPU condition (assumed buildout year of 2062). Since much of the community is undeveloped, a majority of the Circulation Element roadways are not built, are only partially built, or are not operating near capacity. The result of this is that for many facilities, an analysis of the CPU land uses on the existing

transportation network was not possible or meaningful for purposes of identifying significant impacts or recommended mitigations. Therefore, ~~the proposed CPU land uses were analyzed on the draft CPU transportation network.~~ in order to provide a meaningful analysis and identify ultimate recommendations, the traffic study analyzed roadways based on the Adopted Community Plan Classifications and the CPU transportation network instead of the existing functional classifications. The TIA (see Appendix J) analysis identifies recommended CPU classifications, which were incorporated into the CPU (Mobility Element). As stated previously, roadway segments, intersections, and freeway segments are considered to operate acceptably from LOS A to LOS D, and unacceptably at LOS E or F. Metered freeway ramps are considered to operate unacceptably if the delay exceeds 15 minutes and the downstream freeway segment operates at an unacceptable LOS E or F.

5.12.3 Issue 1: Capacity

Would the CPU result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system?

5.12.3.1 Impacts

a. Horizon Year plus CPU Assumptions

SANDAG's 2050 RTP indicates that substantial improvements would be made to the regional transportation system through Year 2050. Regional changes that would affect transportation/circulation include transit, managed/high-occupancy vehicle (HOV) lanes, highway, local roads, transportation demand management, land use, bicycle/pedestrian, and other related efforts. It should be noted that the RTP was updated several times during the development of the CPU. During its development, the TIS analysis was updated to reflect the current RTP. The travel forecast model used to develop future traffic volumes in the TIS was based on the Series 11 Regional Transportation Model which incorporates land use, population, and employment data then estimated for the year 2030. Land uses within the Otay Mesa Community Planning area were assumed to be built out within the traffic model using reasonable maximum development assumptions. The model network included the future transportation improvements that were assumed to be completed, and included Year 2030 Regional Transportation Plan "Reasonably Expected" projects in the region. The Otay Mesa model was modified to include a half-diamond interchange at SR-125 / Lone Star Road. Also, a portion of SR-125 was assumed as a toll facility and modeled to approximate toll conditions.

The differences in the vehicular circulation network between the existing conditions and the Horizon Year plus CPU primarily result from: (1) improvements completed or expected to be completed as a part of future subsequent development projects, consistent with the CPU Mobility Element; (2) funded and scheduled Otay Mesa Public

Facilities Financing Plan transportation projects; and (3) planned Caltrans improvements.

At the Horizon Year, the following improvements are assumed to be completed through buildout of the CPU Mobility Element roadway network (see Figure 3-6). Roadway improvements necessary to implement the CPU Mobility Element roadway network are included in the PFFP for Otay Mesa and would be implemented in conjunction with future projects, as conditions of approval or through payment of Facilities Benefit Assessment (FBA) fees.

- Otay Mesa Road as a 6-lane Primary Arterial from Caliente Avenue to the City limits.

- Airway Road as a 4-lane Collector street west of Caliente Avenue; as a 4-lane Major street from Caliente Avenue to west of Heritage Road; as a 6-lane Primary Arterial from Heritage Road to Cactus Road; as a 6-lane Major Street from Cactus Road to Britannia Boulevard; and as a 4-lane Major Street from Britannia Boulevard to Enrico Fermi Drive (City limits).

- Siempre Viva Road as a 6-lane Primary Arterial from Cactus Road to Paseo de las Americas; and as a 2-lane Collector with two-way left turn lane from Caliente to the west (not connecting to the community of San Ysidro).

- Sanyo Avenue as a four-lane Collector with two-way left turn lane, between Otay Mesa Road and Airway Road.

- Heinrich Hertz as a two-lane Collector with two-way left turn lane between Airway Road and Paseo de las Americas.

- Harvest Road as a 2-lane Collector from Otay Mesa Road to SR 905; and as a 4-lane Collector with two-way left turn lane from Airway to Siempre Viva Road.

- Otay Center Drive as a four-lane Collector with left-turn lane from Harvest Road to Siempre Viva Road.

- Piper Ranch Road as a 4-lane Collector with two-way left turn lane from Lone Star Road to Otay Mesa Road including a freeway underpass at SR 125.

- La Media Road as a 4-lane Major street from Lone Star Road to Otay Mesa Road; as a 6-lane Primary Arterial from Otay Mesa Road to Airway Road; and as a 5-lane Major Street from Airway Road to Siempre Viva Road.

- Lone Star Road as a 6-lane Primary Arterial from La Media Road to the City limits.

- Off-ramp from SR 125 Southbound to Lone Star Road and On-ramp from Lonestar Road to SR 125 Northbound.

- Britannia Boulevard as a 6-lane Primary Arterial from Otay Mesa Road to Airway Road; as a 6-lane Major street from Airway Road to Siempre Viva Road; and as a 4-lane Collector with two-way left turn lane from Siempre Viva Road to Britannia Court.

- Cactus Road as a 4-lane Major street from Otay Mesa Road to Siempre Viva Road, including a freeway overpass at SR 905.

- Heritage Road and Otay Valley Road as a 6-lane Primary Arterial from Main Street in Chula Vista to the proposed extension of Airway Road.

- Caliente Avenue as a 6-lane Primary Arterial from Otay Mesa Road to Airway Road; as a 6-lane Major street from Airway to the proposed Beyer Boulevard; and as a 4-lane Major street from Beyer Boulevard to the proposed Siempre Viva Road.

- Beyer Boulevard as a 4-lane Major Street from Enright Drive to the proposed extension of Caliente Avenue.

- Street A/Old Otay Mesa Road as a 4-lane Major Road from Ocean View Hills Drive to Airway Road including a freeway overpass at SR 905.

- Datsun Street as a 4-lane Collector with two-way left turn lane from Innovative Drive to Heritage Road.

- Aviator Road as a 4-lane Collector with two-way left turn lane from Heritage Road to La Media Road.

- Dennery Road as a 2-lane Collector from Topsail Drive to Avenida de las Vistas.

- Del Sol Boulevard as a 2-lane Collector from Riviera Pointe Street to Surf Crest Drive.

- Vista Santo Domingo/Exposition Way as a 2-lane Collector from Avenida de las Vistas to Corporate Center Drive.

- Emerald Crest Drive as a 4-lane Collector with two way left turn lane from Otay Mesa Road to SR 905.

- Corporate Center Drive as a 4-lane Collector with two way left turn lane from Otay Mesa Road to SR 905.

- Innovative Drive as a 2-lane Collector with two way left turn lane from Otay Mesa Road to SR 905.
- Continental Street as a 2-lane Collector from Otay Mesa Road to Camino Maquiladora; and as a 2-lane Collector with two-way left turn lane from Airway to the north.
- Otay Mesa Center Road as a 4-lane Collector with two-way left turn lane from Otay Mesa Road to Saint Andrews Avenue.
- Saint Andrews Avenue as a 4-lane Collector with two-way left turn lane from Otay Mesa Center Road to La Media Road.
- Paseo de las Americas as a 4-lane Collector with two-way left turn lane from Airway Road to Marconi Drive.
- Marconi Drive as a 2-lane Collector with two-way left turn lane from Paseo de las Americas to Enrico Fermi Drive.
- Avenida Costa Azul as a 4-lane Collector with two-way left turn lane from Otay Mesa Road to the south.

The SANDAG 2050 RTP includes the addition of two managed HOV lanes to the I-805 and a northbound auxiliary lane. As these projects were funded and planned by Caltrans, the analysis included these improvements. SR-905 was designed to allow for future HOV lanes as well; however, the funding for these improvements has not been secured. Therefore, the SR-905 HOV lanes are not included in the traffic analysis. The 2050 RTP also includes SR-11 which will continue east-west from SR-905 to the County to a future additional Port of Entry; a full interchange between SR-125 (toll), SR-905, and the future SR-11 (toll).

As the City of Chula Vista has recently approved a General Plan Amendment (GPA) with the elimination of the La Media Road bridge crossing the Otay River Valley, two 2050 Horizon Year scenarios were analyzed in the TIA (see Appendix J). The Horizon Year without the La Media Road Connection Scenario is utilized to determine the environmental impacts in this section of the PEIR because La Media Road is not reasonably expected to be completed.

As indicated in Section 5.12.2, in order to provide a meaningful analysis and identify ultimate recommendations, the traffic study analyzed roadways based on the Adopted Community Plan Classifications and CPU network instead of the existing functional classifications. The TIA (see Appendix J) analysis identifies recommended CPU classifications, which were incorporated into the CPU (Mobility Element). The proposed classifications incorporated into the CPU are shown in Table 5.12-4 below.

TABLE 5.12-4
PROPOSED CPU ROADWAY CLASSIFICATIONS

Street	Segment	Existing CP Class	CPU Class
Otay Mesa Road	Street A to Caliente Ave.	6-PA	6-M
	Alisa Ct. to La Media Rd.	6-PA	6-PA
	La Media Rd. to Piper Ranch Rd.	7-M	6-PA
	Piper Ranch Rd. to SR-125	8-M	6-PA
	SR-125 to Harvest Rd.	4-P	6-PA
	Harvest Rd. to Sanyo Ave.	4-M	6-PA
	Sanyo Ave. to Enrico Fermi Dr.	4-M	6-PA
Airway Road	Heritage Rd. to Cactus Rd.	4-M	6-PA
	Cactus Rd. to Britannia Blvd.	4-M	6-M
Siempre Viva Road	Caliente Ave. to West Terminus	4-M	2-CL
Caliente Avenue	Otay Mesa Rd. to SR-905	6-M	6-PA
	SR-905 to Airway Rd.	6-M	6-PA
	Airway Rd. to Beyer Blvd.	4-M	6-M
Heritage Road/Otay Valley Road	Avenida De Las Vistas to Datsun St.	6-M	6-PA
	Datsun St. to Otay Mesa Rd.	6-M	6-PA
	Otay Mesa Rd. to SR-905	6-M	6-PA
	SR-905 to Airway Rd.	6-M	6-PA
Cactus Road	Otay Mesa Rd. to Airway Rd.	4-CL	4-M
	Airway Rd. to Siempre Viva Rd.	4-CL	4-M
Britannia Boulevard	Otay Mesa Rd. to SR-905	4-M	6-PA
	SR-905 to Airway Rd.	4-M	6-PA
	Airway Rd. to Siempre Viva Rd.	4-M	6-M
	Siempre Viva Rd. to South End	2-C	4-CL
La Media Road	Birch Rd. to Lone Star Rd.	6-PA	N/A
	Lone Star Rd. to Aviator Rd.	6-PA	4-M
	Aviator Rd. to Otay Mesa Rd.	6-PA	4-M
	Airway Rd. to Siempre Viva Rd.	4-M	5-M
Harvest Road	South of Otay Mesa Rd.	4-M	2-CL
	Airway Rd. to Otay Center Dr.	4-M	4-CL
	Otay Center Dr. to Siempre Viva Rd.	4-M	4-CL
Enrico Fermi Drive	Airway Rd. to Siempre Viva Rd.	4-M	4-CL
	Siempre Viva Rd. to Via de la Amistad	4-M	4-CL
Lone Star Road	SR-125 to Piper Ranch Rd.	4-M	6-PA
	Piper Ranch Rd. to City/County Boundary	4-M	6-PA
Aviator Road	Heritage Rd. to La Media Rd. [1]	2-C	4-CL
Corporate Center Drive	Progressive Ave. to Innovative Dr.	2-C	2-CL
Sanyo Avenue	Otay Mesa Rd. to Airway Rd. [2]	4-C	4-CL
Paseo de las Americas	Airway Rd. to Siempre Viva Rd.	2-C	4-CL
	Siempre Viva Rd. to Marconi Dr.	2-C	4-CL
Marconi Drive	Paseo de las Americas to Enrico Fermi Dr.	2-C	2-CL
Otay Center Drive	Harvest Rd. to Siempre Viva Rd.[2]	4-C	4-CL
St. Andrews Avenue	Otay Mesa Center Rd. to La Media Rd.	2-C	4-CL
Gailes Boulevard	Otay Mesa Rd. to St. Andrews Ave.	2-C	4-C
Otay Mesa Center Road	Otay Mesa Rd. to St. Andrews Ave.	2-C	4-CL
Datsun Street	Innovative Dr. to Heritage Rd. [1]	2-C	4-CL
Avenida Costa Azul	Otay Mesa Rd. to St. Andrews Ave. [1]	2-CL	4-CL
Excellante Street	Airway Rd. to Gigantic St.	4-C	2-C
Gigantic Street	Excellante St. to Centurion St.	4-C	2-C
Centurion Street	Airway Rd. to Gigantic St.	4-C	2-C

1A new roadway added to Circulation Plan by the CPU.
[2]Functional classification is identified in the table, as this roadway is not currently classified.

8-M = 8-lane Major Arterial
7-PA = 7-lane Primary Arterial
7-M = 7-lane Major Arterial
6-PA = 6-lane Primary Arterial
6-M = 6-lane Major Arterial
5-M = 5-lane Major Arterial (3SB /2NB)
4-P = 4-lane Primary Arterial
4-M = 4-lane Major Arterial
4-CL = 4-lane Collector (with continuous left-turn lane)
4-C = 4-lane Collector (without continuous left-turn lane)
2-CL = 2-lane Collector (with continuous left-turn lane)
2-CN = 2-lane Collector (no fronting property)
2-C = 2-lane Collector (without continuous left-turn lane)

b. Horizon Year Plus CPU Condition

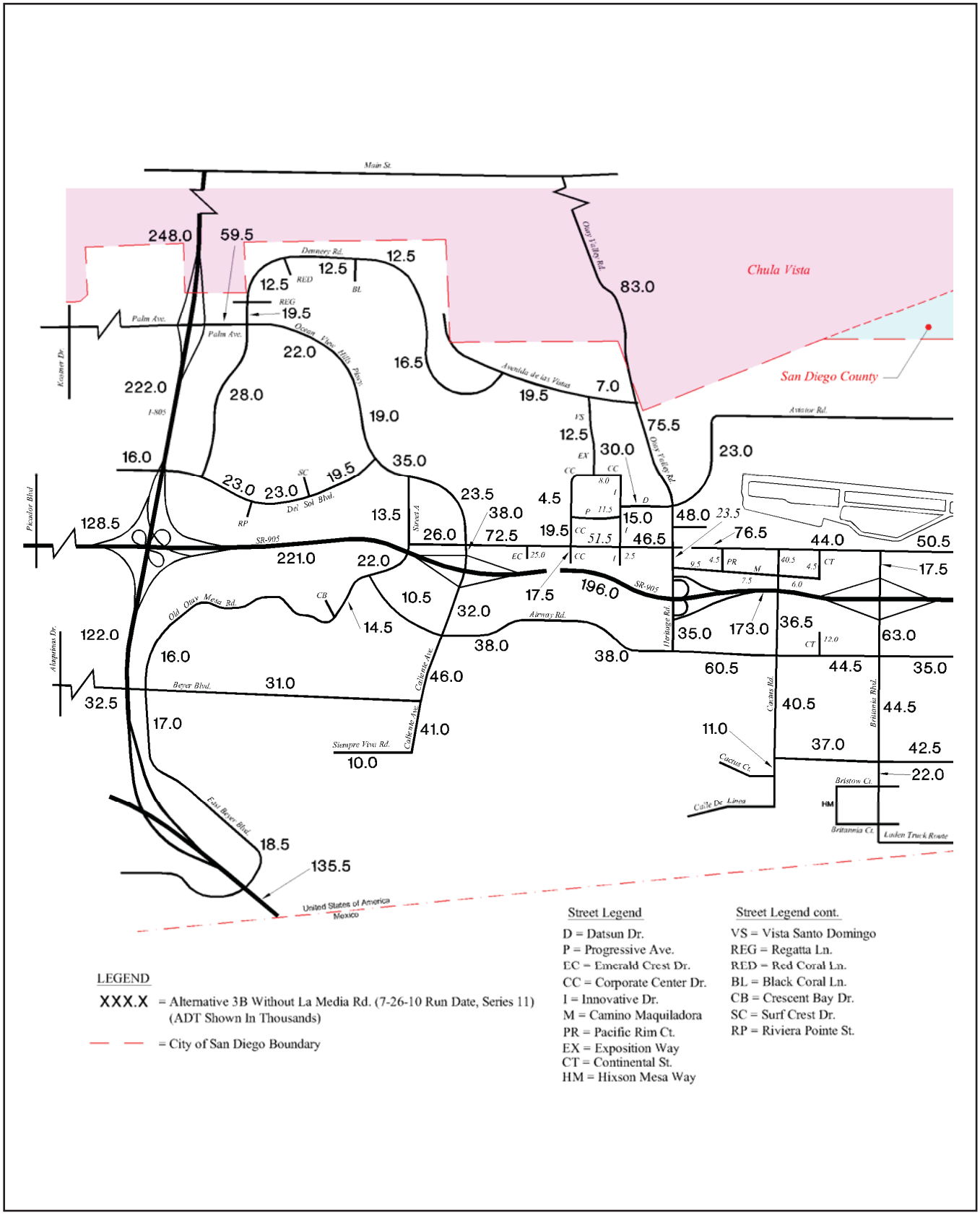
Roadway Segments

The volumes under the Horizon Year Plus CPU conditions are shown on Figures 5.12-3a and 5.12-3b. With the specified proposed classifications, the following roadway segments would be expected to operate at unacceptable levels of service in the Horizon Year Plus CPU condition (Table 5.12-5).

1. Otay Mesa Road, Caliente Ave. to Corporate Center Dr. (LOS F)
2. Otay Mesa Road, Heritage Rd. to Cactus Rd. (LOS F)
3. Airway Road, Caliente Ave. to Heritage Rd. (LOS E)
4. Airway Road, Heritage Rd. to Cactus Rd. (LOS F)
5. Siempre Viva Road, Otay Center Dr. to SR-905 (LOS E)
6. Siempre Viva Road, SR-905 to Paseo de las Americas (LOS F)
7. Caliente Avenue, Airway Rd. to Beyer Blvd. (LOS E)
8. Caliente Avenue, Beyer Blvd. to Siempre Viva Rd. (LOS F)
9. Heritage Road/ Otay Valley Road, Main St. to Avenida de Las Vistas (LOS F)
10. Heritage Road/ Otay Valley Road, Avenida De Las Vistas to Datsun St. (LOS F)
11. Cactus Road, Otay Mesa Rd. to Airway Rd. (LOS F)
12. Cactus Road, Airway Rd. to Siempre Viva Rd. (LOS F)
13. Britannia Boulevard, SR-905 to Airway Rd. (LOS F)
14. La Media Road, SR-905 to Airway Rd. (LOS F)
15. Dennery Road, Black Coral Ln. to East End (LOS F)
16. Avenida De Las Vistas, Vista Santo Domingo to Dennery Rd. (LOS F)
17. Del Sol Boulevard, Surf Crest Dr. to Riviera Pointe (LOS F)
18. Del Sol Boulevard, Riviera Pointe to Dennery Rd. (LOS F)
19. Old Otay Mesa Road, Crescent Bay Dr. to Beyer Blvd. (LOS F)
20. Camino Maquiladora, Heritage Rd. to Pacific Rim Ct. (LOS F)
21. Camino Maquiladora, Pacific Rim Ct. to Cactus Rd. (LOS E)
22. Progressive Avenue, Corporate Center Dr. to Innovative Dr. (LOS F)
23. Datsun Street, Innovative Dr. to Heritage Rd. (LOS F)
24. Exposition Way/Vista Santo Domingo, Avenida de las Vistas to Corporate Dr. (LOS F)

The CPU impacts to the above 24 roadway segments would be significant.

Map Source: Urban Systems Associates, Inc. 2012



LEGEND

XXX.X = Alternative 3B Without La Media Rd. (7-26-10 Run Date, Series 11) (ADT Shown In Thousands)

— — = City of San Diego Boundary

Street Legend

D = Datsun Dr.
P = Progressive Ave.
EC = Emerald Crest Dr.
CC = Corporate Center Dr.
I = Innovative Dr.
M = Camino Maquiladora
PR = Pacific Rim Ct.
EX = Exposition Way
CT = Continental St.
HM = Hixson Mesa Way

Street Legend cont.

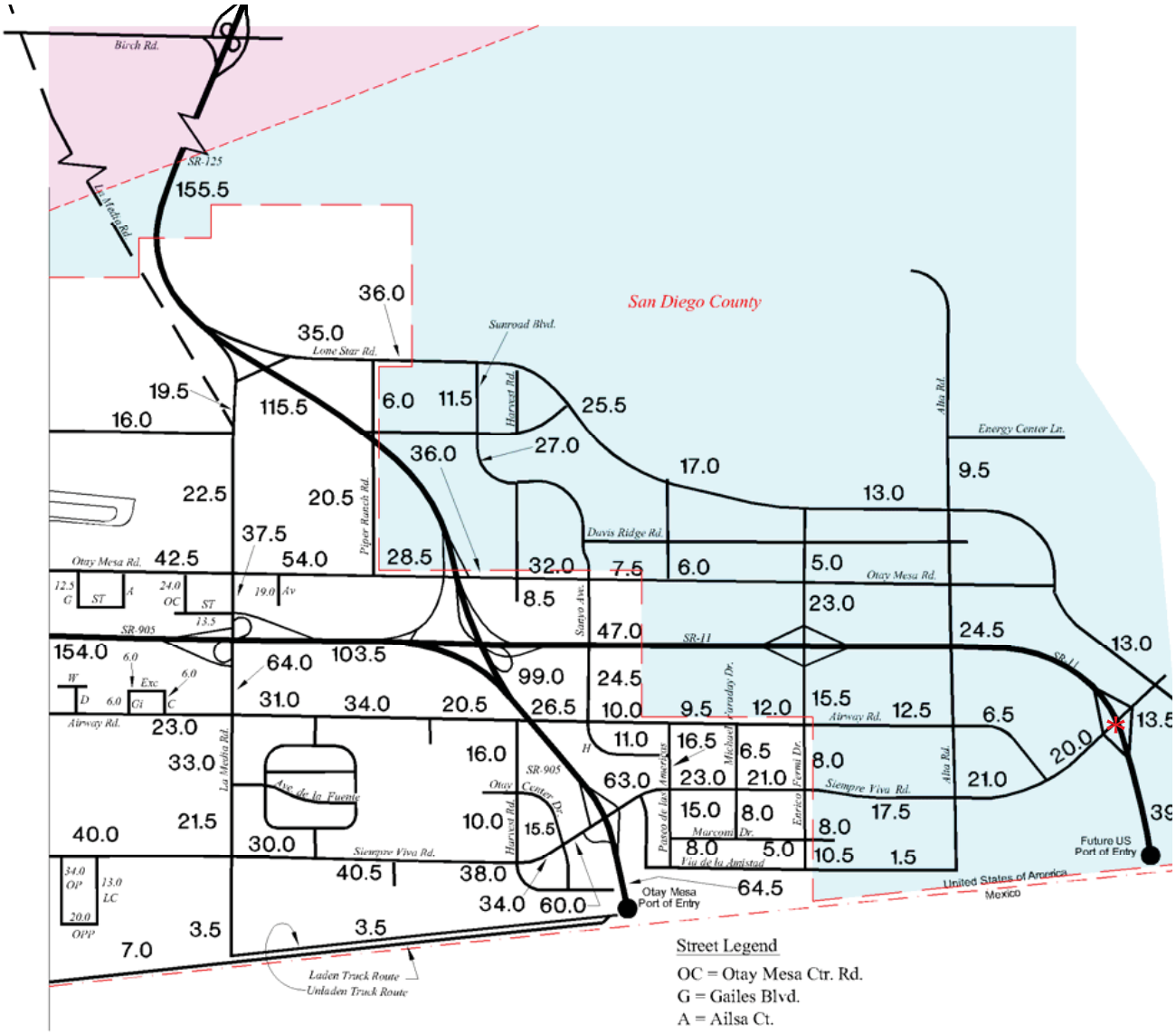
VS = Vista Santo Domingo
REG = Regatta Ln.
RED = Red Coral Ln.
BL = Black Coral Ln.
CB = Crescent Bay Dr.
SC = Surf Crest Dr.
RP = Riviera Pointe St.

Not to Scale

FIGURE 5.12-3a

Horizon Year Plus CPU Condition Roadway Segment Volumes (West)

Map Source: Urban Systems Associates, Inc. 2012



Street Legend

OC = Otay Mesa Ctr. Rd.
G = Gailes Blvd.
A = Ailsa Ct.
ST = St. Andrews Ave.
H = Heinrich Hertz Dr.
C = Centurion St.
Gi = Gigantic St.
Exc = Excellante St.
Av = Avenida Costa Azul
W = Waterville Rd.
D = Dublin Dr.
OP = Otay Pacific Dr.
OPP = Otay Pacific Pl.
LC = Las Californias Dr.

LEGEND

XXX.X = Alternative 3B Without La Media Rd. (7-26-10 Run Date, Series 11) (ADT Shown In Thousands)

— — = City of San Diego Boundary

* - Refer to the Caltrans SR-11 and Otay Mesa POE Final Tier II EIR/EIS, March 2012 for the preferred alternative.

Not to Scale

FIGURE 5.12-3b

Horizon Year Plus CPU Condition Roadway Segment Volumes (East)

TABLE 5.12-5
CPU HORIZON YEAR ROADWAY SEGMENT LEVEL OF SERVICE

Street	Segment	Horizon Year					Horizon Year with CPU			Sig?
		Class[1]	LOS E ADT[2]	Segment ADT	V/C	LOS	New Class	New V/C	New LOS	
Otay Mesa Road	Street A to Caliente Ave.	6-PA	60,000	26,000	0.43	B	6-M	0.52	B	N
	Caliente Ave. to Corporate Center Dr.	6-PA	60,000	72,500	1.21	**F**	-	-	-	**Y**
	Corporate Center Dr. to Innovative Dr.	6-PA	60,000	51,500	0.86	D	-	-	-	N
	Innovative Dr. to Heritage Rd.	6-PA	60,000	46,500	0.78	C	-	-	-	N
	Heritage Rd. to Cactus Rd.	6-PA	60,000	76,500	1.28	**F**	-	-	-	**Y**
	Cactus Rd. to Britannia Blvd.	6-PA	60,000	44,000	0.73	C	-	-	-	N
	Britannia Blvd. to Ailsa Ct.	6-PA	60,000	50,500	0.84	D	-	-	-	N
	Alisa Ct. to La Media Rd.	7-M	55,000	42,500	0.77	C	6-PA	0.71	C	N
	La Media Rd. to Piper Ranch Rd.	8-M	70,000	54,000	0.77	C	6-PA	0.90	D	N
	Piper Ranch Rd. to SR-125	4-P	45,000	28,500	0.63	C	6-PA	0.48	B	N
	SR-125 to Harvest Rd.	4-M	40,000	36,000	0.90	**E**	6-PA	0.60	C	N
	Harvest Rd. to Sanyo Ave.	4-M	40,000	32,000	0.80	D	6-PA	0.53	B	N
	Sanyo Ave. to Enrico Fermi Dr.	4-M	40,000	7,500	0.19	A	6-PA	0.13	A	N
Airway Road	Old Otay Mesa Rd. to Caliente Ave.	4-CL	30,000	10,500	0.35	A	-	-	-	N
	Caliente Ave. to Heritage Rd.	4-M	40,000	38,000	0.95	**E**	-	-	-	**Y**
	Heritage Rd. to Cactus Rd.	4-M	40,000	60,500	1.52	**F**	6-PA	1.01	F	**Y**
	Cactus Rd. to Britannia Blvd.	4-M	40,000	44,500	1.11	**F**	6-M	0.89	D	N
	Britannia Blvd. to La Media Rd.	4-M	40,000	35,000	0.88	D	-	-	-	N
	La Media Rd. to Harvest Rd.	4-M	40,000	34,000	0.85	D	-	-	-	N
	Harvest Rd. to Sanyo Ave.	4-M	40,000	26,500	0.66	C	-	-	-	N
	Sanyo Ave. to Paseo de las Americas	4-M	40,000	10,000	0.25	A	-	-	-	N
	Paseo de las Americas to Michael Faraday Dr.	4-M	40,000	9,500	0.24	A	-	-	-	N
	Michael Faraday Dr. to Enrico Fermi Dr.	4-M	40,000	12,000	0.30	A	-	-	-	N
	Enrico Fermi Dr. to Siempre Viva Rd.*	4-M	40,000	12,500	0.31	A	-	-	-	N
Siempre Viva Road	Caliente Ave. to West Terminus	4-M	40,000	10,000	0.25	A	2-CL	0.67	C	N
	Cactus Rd. to Britannia Blvd.	6-PA	60,000	37,000	0.62	C	-	-	-	N
	Britannia Blvd. to La Media Rd.	6-PA	60,000	42,500	0.71	C	-	-	-	N
	La Media Rd. to Harvest Rd.	6-PA	60,000	40,500	0.68	C	-	-	-	N
	Harvest Rd. to Otay Center Dr.	6-PA	60,000	34,000	0.57	B	-	-	-	N
	Otay Center Dr. to SR-905	6-PA	60,000	60,000	1.00	**E**	-	-	-	**Y**
	SR-905 to Paseo de las Americas	6-PA	60,000	63,000	1.05	**F**	-	-	-	**Y**
	Paseo de las Americas to Michael Faraday Dr.	4-M	40,000	23,000	0.58	C	-	-	-	N
	Michael Faraday Dr. to Enrico Fermi Dr.	4-M	40,000	21,000	0.53	B	-	-	-	N
	Enrico Fermi Dr. to SR-11*	4-M	40,000	17,500	0.44	B	-	-	-	N

TABLE 5.12-5
CPU HORIZON YEAR ROADWAY SEGMENT LEVEL OF SERVICE
(continued)

Street	Segment	Horizon Year					Horizon Year with CPU			
		Class[1]	LOS E ADT[2]	Segment ADT	V/C	LOS	New Class	New V/C	New LOS	Sig?
Palm Ave.	I-805 to Dennery Rd.	7-PA	65,000	59,500	0.92	D	-	-	-	N
Ocean View Hills Parkway	Dennery Rd. to Del Sol Blvd.	4-M	40,000	22,000	0.55	C	-	-	-	N
	Del Sol Blvd. to Street "A"	6-M	50,000	35,000	0.70	C	-	-	-	N
	Street "A" to Otay Mesa Rd.	6-M	50,000	23,500	0.42	B	-	-	-	N
Caliente Avenue	Otay Mesa Rd. to SR-905	6-M	50,000	38,000	0.76	C	6-PA	0.63	C	N
	SR-905 to Airway Rd.	6-M	50,000	32,000	0.64	C	6-PA	0.53	B	N
	Airway Rd. to Beyer Blvd.	4-M	40,000	46,000	1.15	**F**	6-M	0.92	**E**	**Y**
	Beyer Blvd. to Siempre Viva Rd.	4-M	40,000	41,000	1.03	**F**	-	-	-	**Y**
Beyer Boulevard	Alaquinas Dr. to Old Otay Mesa Rd. Old Otay Mesa Rd. to Caliente Ave.[3]	4-M	40,000	32,500	0.81	D	-	-	-	N
		4-M	40,000	31,000	0.78	D	-	-	-	N
Heritage Road/ Otay Valley Road	Main St. to Avenida de Las Vistas**	6-PA	60,000	83,000	1.38	**F**	-	-	-	**Y**
	Avenida De Las Vistas to Datsun St.	6-M	50,000	75,500	1.51	**F**	6-PA	1.26	**F**	**Y**
	Datsun St. to Otay Mesa Rd.	6-M	50,000	48,000	0.96	**E**	6-PA	0.80	C	N
	Otay Mesa Rd. to SR-905	6-M	50,000	23,500	0.47	B	6-PA	0.39	A	N
	SR-905 to Airway Rd.	6-M	50,000	35,000	0.70	C	6-PA	0.58	B	N
Cactus Road	Otay Mesa Rd. to Airway Rd.	4-CL	30,000	40,500	1.35	**F**	4-M	1.01	**F**	**Y**
	Airway Rd. to Siempre Viva Rd.	4-CL	30,000	40,500	1.35	**F**	4-M	1.01	**F**	**Y**
	Siempre Viva Rd. to South End	2-CL	15,000	11,000	0.73	D	-	-	-	N
Britannia Boulevard	Otay Mesa Rd. to SR-905	4-M	40,000	17,500	0.44	B	6-PA	0.29	A	N
	SR-905 to Airway Rd.	4-M	40,000	63,000	1.58	**F**	6-PA	1.05	**F**	**Y**
	Airway Rd. to Siempre Viva Rd.	4-M	40,000	44,500	1.11	**F**	6-M	0.89	D	N
	Siempre Viva Rd. to South End	2-C	8,000	22,000	2.75	**F**	4-CL	0.73	D	N
La Media Road	Birch Rd. to Lone Star Rd.**	6-PA	60,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Lone Star Rd. to Aviator Rd.	6-PA	60,000	19,500	0.33	A	4-M	0.49	B	N
	Aviator Rd. to Otay Mesa Rd.	6-PA	60,000	22,500	0.38	A	4-M	0.56	C	N
	Otay Mesa Rd. to SR-905	6-PA	60,000	37,500	0.63	C	-	-	-	N
	SR-905 to Airway Rd.	6-PA	60,000	64,000	1.06	**F**	-	-	-	**Y**
	Airway Rd. to Siempre Viva Rd.	4-M	40,000	33,000	0.83	D	5-M	0.73	C	N
Harvest Road	South of Otay Mesa Rd.	4-M	40,000	8,500	0.21	A	2-CL	0.57	C	N
	Airway Rd. to Otay Center Dr.	4-M	40,000	16,000	0.40	B	4-CL	0.53	C	N
	Otay Center Dr. to Siempre Viva Rd.	4-M	40,000	10,000	0.25	A	4-CL	0.33	A	N
Enrico Fermi Drive	SR-11 to Airway Rd.*	4-M	40,000	15,500	0.62	B	-	-	-	N
	Airway Rd. to Siempre Viva Rd.	4-M	40,000	8,000	0.20	A	4-CL	0.27	A	N
	Siempre Viva Rd. to Via de la Amistad	4-M	40,000	10,500	0.26	A	4-CL	0.35	B	N

TABLE 5.12-5
CPU HORIZON YEAR ROADWAY SEGMENT LEVEL OF SERVICE
(continued)

Street	Segment	Horizon Year					Horizon Year with CPU			
		Class[1]	LOS E ADT[2]	Segment ADT	V/C	LOS	New Class	New V/C	New LOS	Sig?
Lone Star Road	SR-125 to Piper Ranch Rd.	4-M	40,000	35,000	0.88	D	6-PA	0.58	B	N
	Piper Ranch Rd. to City/County Boundary	4-M	40,000	36,000	0.90	**E**	6-PA	0.60	C	N
Aviator Road	Heritage Rd. to La Media Rd. [3]	2-C	8,000	23,000	2.88	F	4-CL	0.77	D	N
Dennery Road	Palm Ave. to Del Sol Blvd.	4-M	40,000	28,000	0.70	C	-	-	-	N
	Palm Ave. to Regatta Ln.	4-M	40,000	19,500	0.49	B	-	-	-	N
	Regatta Ln. to Red Coral Ln.	4-CL	30,000	12,500	0.42	B	-	-	-	N
	Red Coral Ln. to Black Coral Ln.	2-CL	15,000	12,500	0.83	D	-	-	-	N
	Black Coral Ln. to East End	2-CN	10,000	16,500	1.65	**F**	-	-	-	**Y**
Avenida De Las Vistas	Otay Valley Rd. to Vista Santo Domingo	2-CN	10,000	7,000	0.70	C	-	-	-	N
	Vis ta Santo Domingo to Dennery Rd.	2-CN	10,000	19,500	1.95	**F**	-	-	-	**Y**
Del Sol Boulevard	Ocean View Hills Pkwy. to Surf Crest Dr.	4-CL	30,000	19,500	0.65	C	-	-	-	N
	Surf Crest Dr. to Riviera Pointe	2-CN	10,000	23,000	2.30	**F**	-	-	-	**Y**
	Riviera Pointe to Dennery Rd.	2-CL	15,000	23,000	1.53	**F**	-	-	-	**Y**
	Dennery Rd. to I-805	4-CL	30,000	16,000	0.53	C	-	-	-	N
Street A	Ocean View Hills Pkwy. to Otay Mesa Rd.	4-M	40,000	13,500	0.34	A	-	-	-	N
Old Otay Mesa Road	Otay Mesa Rd. to Airway Rd.	4-CL	30,000	22,000	0.73	D	-	-	-	N
	Airway Rd. to Crescent Bay Dr.	4-CL	30,000	14,500	0.48	C	-	-	-	N
	Crescent Bay Dr. to Beyer Blvd.	2-C	8,000	16,000	2.00	**F**	-	-	-	**Y**
Emerald Crest Dr.	Otay Mesa Rd. to South End [3]	4-CL	30,000	25,000	0.83	D	-	-	-	N
Corporate Center Drive	South End to Otay Mesa Rd. [3]	4-CL	30,000	17,500	0.58	C	-	-	-	N
	Otay Mesa Rd. to Progressive Ave.	4-CL	30,000	19,500	0.65	C	-	-	-	N
	Progressive Ave. to Innovative Dr.	2-C	8,000	8,000	1.00	**E**	2-CL	0.53	C	N
Innovative Drive	Otay Mesa Rd. to Corporate Center Dr.	4-CL	30,000	15,000	0.50	C	-	-	-	N
Piper Ranch Road	Lone Star Rd. to Otay Mesa Rd.	4-CL	30,000	20,500	0.68	D	-	-	-	N
Sanyo Avenue	Otay Mesa Rd. to Airway Rd. [4]	4-C	15,000	24,500	1.63	**F**	4-CL	0.82	D	N
Heinrich Hertz Drive	Airway Rd. to Paseo de las Americas[4]	2-CL	15,000	12,000	0.80	D	-	-	-	N
Paseo de las Americas	Airway Rd. to Siempre Viva Rd.	2-C	8,000	16,500	2.06	**F**	4-CL	0.55	C	N
	Siempre Viva Rd. to Marconi Dr.	2-C	8,000	15,000	1.88	**F**	4-CL	0.50	C	N
Marconi Drive	Paseo de las Americas to Enrico Fermi Dr.	2-C	8,000	8,000	1.00	**E**	2-CL	0.53	C	N
Otay Center Drive	Harvest Rd. to Siempre Viva Rd.[4]	4-C	15,000	15,500	1.03	**F**	4-CL	0.52	C	N
Michael Faraday Drive	Airway Rd. to Siempre Viva Rd. [4]	2-CL	15,000	6,500	0.43	B	-	-	-	N
	Siempre Viva Rd. to Marconi Dr. [4]	2-CL	15,000	8,000	0.53	C	-	-	-	N
St. Andrews Avenue	Otay Mesa Center Rd. to La Media Rd.	2-C	8,000	13,500	1.69	**F**	4-CL	0.45	C	N

TABLE 5.12-5
CPU HORIZON YEAR ROADWAY SEGMENT LEVEL OF SERVICE
(continued)

Street	Segment	Horizon Year					Horizon Year with CPU			Sig?
		Class[1]	LOS E ADT[2]	Segment ADT	V/C	LOS	New Class	New V/C	New LOS	
Gailes Boulevard	Otay Mesa Rd. to St. Andrews Ave.	2-C	8,000	12,500	1.56	**F**	4-C	0.83	D	N
Camino Maquiladora	Heritage Rd. to Pacific Rim Ct.	2-C	8,000	9,500	1.19	**F**	-	-	-	**Y**
	Pacific Rim Ct. to Cactus Rd.	2-C	8,000	7,500	0.94	**E**	-	-	-	**Y**
	Cactus Rd. to Continental St.	2-C	8,000	6,000	0.75	D	-	-	-	N
Pacific Rim Court	Otay Mesa Rd. to Camino Maquiladora	2-C	8,000	4,500	0.56	C	-	-	-	N
Progressive Avenue	Corporate Center Dr. to Innovative Dr.	2-C	8,000	11,500	1.44	**F**	-	-	-	**Y**
Otay Mesa Center Road	Otay Mesa Rd. to St. Andrews Ave.	2-C	8,000	24,000	1.60	**F**	4-CL	0.80	D	N
Datsun Street	Innovative Dr. to Heritage Rd. [3]	2-C	8,000	30,000	3.75	**F**	4-CL	1.00	**E**	**Y**
Avenida Costa Azul	Otay Mesa Rd. to St. Andrews Ave. [3]	2-CL	15,000	19,000	1.27	**F**	4-CL	0.63	B	N
Excellante Street	Airway Rd. to Gigantic St.	4-C	15,000	6,000	0.40	B	2-C	0.75	D	N
Gigantic Street	Excellante St. to Centurion St.	4-C	15,000	6,000	0.40	B	2-C	0.75	D	N
Centurion Street	Airway Rd. to Gigantic St.	4-C	15,000	6,000	0.40	B	2-C	0.75	D	N
Exposition Way/ Vista Santo Domingo	Avenida De Las Vistas to Corporate Dr. [4]	2-CN	10,000	12,500	1.25	**F**	-	-	-	**Y**
Continental Street	South of Otay Mesa Rd.	2-C	8,000	4,500	0.56	C	-	-	-	N
	North of Airway Rd.	2-CL	15,000	12,000	0.80	D	-	-	-	N

NOTE:
*Segment in County of San Diego
**Segment in City of Chula Vista
[1]Current Community Plan Classification, unless footnotes [3] or [4] apply.
[2]Source: City of San Diego Traffic Impact Study Manual, Table 2.
[3]Add to Circulation Plan.
[4]Functional classification shown, not currently classified.
Sig? = Significant impact, Yes (Y) or No (N).
New LOS = LOS after change in classification.
- = No reclassification is proposed by the CPU.
N/A = Not applicable, as this analysis assumes the segment of La Media Road between Birch Road and Lone Star Road is not completed since the City of Chula Vista has removed it from their facilities financing plan.

Legend

8-M	=	8-lane Major Arterial
7-PA	=	7-lane Primary Arterial
7-M	=	7-lane Major Arterial
6-PA	=	6-lane Primary Arterial
6-M	=	6-lane Major Arterial
5-M	=	5-lane Major Arterial (3SB /2NB)
4-P	=	4-lane Primary Arterial
4-M	=	4-lane Major Arterial
4-CL	=	4-lane Collector (with continuous left-turn lane)
4-C	=	4-lane Collector (without continuous left-turn lane)
2-CL	=	2-lane Collector (with continuous left-turn lane)
2-CN	=	2-lane Collector (no fronting property)
2-C	=	2-lane Collector (without continuous left-turn lane)

Intersections

With the specified proposed classifications the following intersections would be expected to operate at unacceptable levels of service in the Horizon Year Plus CPU condition (Table 5.12-6):

1. Palm Ave./I-805 NB Ramps (LOS F in the AM and PM peak hours)
2. Palm Ave./Dennery Rd. (LOS E in the PM peak hour)
3. Otay Mesa Rd./Caliente Ave. (LOS F in the AM and PM peak hours)
4. Caliente Ave./SR-905 WB Ramps (LOS F in the AM peak hour and LOS D with excessive queues blocking the intersection in the PM peak hour)
5. Caliente Ave./SR-905 EB Ramps (LOS F in the AM and PM peak hours)
6. Caliente Ave./Airway Rd. (LOS F in the AM and PM peak hours)
7. Caliente Ave./Beyer Blvd. (LOS F in the AM and PM peak hours)
8. Otay Mesa Rd./Heritage Rd. (LOS F in the AM and PM peak hours)
9. Heritage Rd./SR-905 WB Ramps (LOS E in the AM peak hour and LOS F in the PM peak hour)
10. Heritage Rd./SR-905 EB Ramps (LOS F in the AM and PM peak hours)
11. Heritage Rd./Airway Rd. (LOS F in the AM and PM peak hours)
12. Otay Mesa Rd./Cactus Rd. (LOS F in the AM and PM peak hours)
13. Airway Rd./Cactus Rd. (LOS F in the AM and PM peak hours)
14. Siempre Viva Rd./Cactus Rd. (LOS F in the PM peak hour)
15. Otay Mesa Rd./Britannia Blvd. (LOS F in the AM and PM peak hours)
16. Britannia Blvd./SR-905 WB Ramps (LOS F in the AM and PM peak hours)
17. Britannia Blvd./SR-905 EB Ramps (LOS F in the AM and PM peak hours)
18. Britannia Blvd./Airway Rd. (LOS F in the AM and PM peak hours)
19. Siempre Viva Rd./Britannia Blvd. (LOS F in the AM and PM peak hours)
20. Otay Mesa Rd./La Media Rd. (LOS F in the AM and PM peak hours)
21. La Media Rd./SR-905 WB Ramps (LOS F in the AM and PM peak hours)
22. La Media Rd./SR-905 EB Ramps (LOS F in the AM and PM peak hours)
23. La Media Rd./Airway Rd. (LOS F in the AM and PM peak hours)
24. La Media Rd./Siempre Viva Rd. (LOS F in the AM and PM peak hours)
25. Lone Star Rd./SR-125 SB Off Ramp (LOS E in the AM peak hour and LOS F in the PM peak hours)
26. Lone Star Rd./SR-125 NB On Ramp (LOS A with excessive queues blocking the intersection in the AM peak hour and LOS F in the PM peak hour)
27. Lone Star Rd./Piper Ranch Rd. (LOS A with excessive queues blocking the intersection in the PM peak hour)
28. Otay Mesa Rd./Piper Ranch Rd. (LOS F in the AM and PM peak hours)
29. Otay Mesa Rd./SR-125 SB Off Ramp (LOS F in the AM peak hour and LOS B with excessive queues blocking the intersection in the PM peak hour)
30. Otay Mesa Rd./Harvest Rd. (LOS F in the PM peak hour)
31. Siempre Viva Rd./Otay Center Dr. (LOS F in the AM and PM peak hours)

32. Siempre Viva Rd./SR-905 SB to EB Ramp (LOS C with excessive queues blocking the intersection in the AM peak hour and LOS F in the PM peak hour)
33. Siempre Viva Rd./SR-905 SB to WB Ramp (LOS F in the AM and PM peak hours)
34. Siempre Viva Rd./SR-905 NB Ramps (LOS D with excessive queues blocking the intersection in the AM peak hour and LOS F in the PM peak hour)
35. Siempre Viva Rd./Paseo de las Americas (LOS F in the AM and PM peak hours)
36. Ocean View Hills Pkwy./Del Sol Blvd. (LOS E in the AM and PM peak hours)
37. Ocean View Hills Pkwy./Street A (LOS E in the PM peak hour)
38. Old Otay Mesa Rd./Beyer Blvd. (LOS F in the AM and PM peak hours)
39. Otay Mesa Rd./Corporate Center Dr. (LOS F in the AM and PM peak hours)
40. Otay Mesa Rd./Innovative Dr. (LOS F in the AM and PM peak hours)
41. Harvest Rd./Airway Rd. (LOS F in the AM peak hour)
42. Harvest Rd./Siempre Viva Rd. (LOS E in the AM and PM peak hours)
43. Otay Mesa Rd./Sanyo Ave. (LOS F in the AM and PM peak hours)
44. Airway Rd./Sanyo Ave. (LOS F in the AM and PM peak hours)
45. Paseo de las Americas/Heinrich Hertz Dr. (LOS F in the AM and PM peak hours)
46. Paseo de las Americas/Marconi Dr. (LOS F in the AM and PM peak hours)
47. Heritage Rd./Otay Valley Rd. (LOS F in the AM and PM peak hours)
48. Aviator Rd./La Media Rd. (LOS F in the AM peak hour)
49. Otay Valley Rd./Avenida de las Vistas (LOS F in the AM and PM peak hours)

The CPU impacts at these 49 intersections would be significant.

Freeway Segments

Under the Horizon Year Plus CPU conditions, the following five segments of SR-905 would be expected to operate at unacceptable levels (Table 5.12-7):

1. SR-905, between Picador Boulevard and I-805 (LOS F0)
2. SR-905, between I-805 and Caliente Avenue (LOS F2)
3. SR-905, between Caliente Avenue and Heritage Drive (LOS F3)
4. SR-905, between Heritage Drive and Britannia Boulevard (LOS F1)
5. SR-905, between Britannia Boulevard and La Media Road (LOS F0)

While the SR-905 has been planned to allow future HOV lanes, such a project has not been funded and, therefore, is not included in the analysis. The CPU impacts to these five SR-905 segments would be significant.

TABLE 5.12-6
CPU HORIZON YEAR INTERSECTION LEVELS OF SERVICE

		Horizon Year Plus CPU					Horizon Year Plus CPU With Mitigation				
		AM Peak Hour		PM Peak Hour			AM Peak Hour		PM Peak Hour		Significant After
	Intersection	CD	LOS	CD	LOS	Mitigation	CD	LOS	CD	LOS	Mitigation?
1	Palm Ave./I-805 SB Ramps	48.9	D	51.3	D	Revise SB-LTR to LT; +1 SB-R*	24.8	C	35.7	D	-
2	Palm Ave./I-805 NB Ramps	116.1	**F**	122.6	**F**	+1 dedicated NB-L; +1EB-T; +1EB-R; +1WB-T; +1WB-R	4.6	A	5.5	A	No
3	Palm Ave./Dennery Rd.	33.5	C	67.2	**E**	-	-	-	-	-	**Yes**
4	Otay Mesa Rd./Caliente Ave.	263.5	**F**	146.0	**F**	+1 dedicated NB-R	205.9	**F**	87.2	**F**	**Yes**
5	Caliente Ave./SR-905 WB Ramps	83.1	**F**	43.2	**D**[1]	+1 NB-L; +1 dedicated SB-R	34.0	**C**[1]	34.0	**C**[1]	**Yes**
6	Caliente Ave./SR-905 EB Ramps	165.7	**F**	150.5	**F**	+1 dedicated NB-R; +1SB-L; +1 dedicated EB-R	55.0	**E**	70.2	**E**	**Yes**
7	Caliente Ave./Airway Rd.	228.5	**F**	223.0	**F**	+1 dedicated NB-L; +1 dedicated EB-R	143.0	**F**	200.5	**F**	**Yes**
8	Caliente Ave./Beyer Blvd.	252.0	**F**	429.8	**F**	+2 dedicated SB-R; +1 dedicated EB-R	212.7	**F**	122.4	**F**	**Yes**
9	Otay Mesa Rd./Heritage Rd.	367.5	**F**	257.4	**F**	+1 dedicated NB-R; +1 dedicated SB-R; +1WB-R	272.0	**F**	161.2	**F**	**Yes**
10	Heritage Rd./SR-905 WB Ramps	69.9	**E**	81.1	**F**	+2 dedicated NB-R	15.9	**B**[1]	28.4	**C**[1]	**Yes**
11	Heritage Rd./SR-905 EB Ramps	113.0	**F**	86.4	**F**	+1 dedicated NB-L; +1 dedicated WB-R	39.5	**D**[1]	25.5	**C**[1]	**Yes**
12	Heritage Rd./Airway Rd.	162.7	**F**	402.8	**F**	+2 dedicated WB-R	144.5	**F**	88.3	**F**	**Yes**
13	Heritage Rd./Siempre Viva Rd.	N/A	N/A	N/A	N/A	-	N/A	N/A	N/A	N/A	-
14	Otay Mesa Rd./Cactus Rd.	437.9	**F**	290.5	**F**	+2 dedicated EB-R; +1 dedicated WB-R	139.6	**F**	199.7	**F**	**Yes**
15	Airway Rd./Cactus Rd.	361.5	**F**	437.7	**F**	+1 dedicated NB-R; +1 dedicated SB-R; +1 dedicated EB-R; +2 dedicated WB-R	188.6	**F**	306.2	**F**	**Yes**
16	Siempre Viva Rd./Cactus Rd.	48.7	**D**	127.7	**F**	+1 dedicated NB-R	47.6	D	117.3	**F**	**Yes**
17	Otay Mesa Rd./Britannia Blvd.	108.5	**F**	117.2	**F**	+1 dedicated EB-R; +1 dedicated WB-R	63.1	**E**	47.5	D	**Yes**
18	Britannia Blvd./SR-905 WB Ramps	240.5	**F**	577.4	**F**	Restripe 3rd SB-T to SB-TR; +1 dedicated SB-R; Restripe WB-T to LTR	65.0	**E**	547.1	**F**	**Yes**
19	Britannia Blvd./SR-905 EB Ramps	353.3	**F**	235.1	**F**	+2 dedicated NB-R	305.9	**F**	67.1	**E**	**Yes**
20	Britannia Blvd./Airway Rd.	618.2	**F**	615.8	**F**	+1 dedicated NB-R; +2 dedicated SB-R; +1 dedicated EB-R; +2 dedicated WB-R	184.9	**F**	241.1	**F**	**Yes**
21	Siempre Viva Rd./Britannia Blvd.	363.3	**F**	362.8	**F**	+1 dedicated NB-R; +2 dedicated SB-R; +1 dedicated EB-R; +2 dedicated WB-R	177.5	**F**	143.2	**F**	**Yes**

TABLE 5.12-6
CPU HORIZON YEAR INTERSECTION LEVELS OF SERVICE
(continued)

		Horizon Year Plus CPU					Horizon Year Plus CPU With Mitigation				Significant After Mitigation?
		AM Peak Hour		PM Peak Hour			AM Peak Hour		PM Peak Hour		
	Intersection	CD	LOS	CD	LOS	Mitigation	CD	LOS	CD	LOS	
22	Otay Mesa Rd./La Media Rd.	457.1	**F**	443.8	**F**	+2 dedicated NB-R; +2 dedicated SB-R; +2 dedicated EB-R; +2 dedicated WB-R	131.9	**F**	126.2	**F**	**Yes**
23	La Media Rd./SR-905 WB Ramps	266.1	**F**	227.2	**F**	+1 NB-T; +1 dedicated SB-L	129.8	**F**	112.7	**F**	**Yes**
24	La Media Rd./SR-905 EB Ramps	234.7	**F**	84.7	**F**	+1 SB-T	162.2	**F**	48.5	**D**[1]	**Yes**
25	La Media Rd./Airway Rd.	496.6	**F**	507.9	**F**	+1 dedicated NB-R; +2 dedicated SB-R; +1 dedicated EB-R; +2 dedicated WB-R	182.5	**F**	212.5	**F**	**Yes**
26	La Media Rd./Siempre Viva Rd.	244.0	**F**	112.1	**F**	Restripe SB to 1T and 2SB-R; +2 dedicated WB-R	81.6	**F**	37.1	D	**Yes**
27	La Media Rd./Lone Star Rd.	N/A	N/A	N/A	N/A	-	N/A	N/A	N/A	N/A	**-**
28	Lone Star Rd./SR-125 SB Off Ramp	63.6	**E**	96.8	**F**	-	-	-	-	-	**Yes**
29	Lone Star Rd./SR-125 NB On Ramp	2.1	A[1]	147.8	**F**	-	-	-	-	-	**Yes**
30	Lone Star Rd./Piper Ranch Rd.	8.1	A	9.3	**A**[1]	-	-	-	-	-	**Yes**
31	Otay Mesa Rd./Piper Ranch Rd.	129.2	**F**	166.2	**F**	+1 dedicated NB-R; +2 dedicated SB-R; +1 dedicated EB-R; +1 dedicated WB-R	44.6	D	47.5	D	No
32	Otay Mesa Rd./SR-125 SB Off Ramp	82.9	**F**	13.0	**B**[1]	Restripe SB to SB-L, SB-T/L, SB-R	30.4	C	11.0	**B**[1]	**Yes**
33	Otay Mesa Rd./SR-125 NB On Ramp	4.8	A	22.0	C	-	-	-	-	-	**-**
34	Otay Mesa Rd./Harvest Rd.	37.9	D	133.7	**F**	+1 NB-L; +1 dedicated EB-R	11.8	B	38.9	**D**[1]	**Yes**
35	Siempre Viva Rd./Otay Center Dr.	276.0	**F**	213.0	**F**	+1 dedicated NB-R; +1 SB-L; +1 dedicated SB-R; +1 EB-L; +1 dedicated EB-R; +1 WB-L; +1 dedicated WB-R	83.0	**F**	85.4	**F**	**Yes**
36	Siempre Viva Rd./SR-905 SB to EB Ramp	29.0	**C**[1]	146.2	**F**	-	-	-	-	-	**Yes**
36A	Siempre Viva Rd./SR-905 SB to WB Ramp	2,641[2]	**F**[1]	205.7[2]	**F**	Signalize; +1 SB-R	382.0	**F**	16.3	**B**[1]	**Yes**
37	Siempre Viva Rd./SR-905 NB Ramps	47.2	**D**[1]	262.7	**F**	+1 WB-R	39.3	**D**[1]	250.4	**F**	**Yes**
38	Siempre Viva Rd./Paseo de las Americas	188.8	**F**	367.1	**F**	NB restriped to L, LT, R; SB restriped to L, T, 2R; +1 dedicated WB-R	78.8	**E**	159.5	**F**	**Yes**
39	Dennery Rd./Del Sol Blvd.	49.3	D	49.4	D	-	-	-	-	-	**-**

TABLE 5.12-6
CPU HORIZON YEAR INTERSECTION LEVELS OF SERVICE
(continued)

		Horizon Year Plus CPU					Horizon Year Plus CPU With Mitigation				Significant After Mitigation?
		AM Peak Hour		PM Peak Hour			AM Peak Hour		PM Peak Hour		
	Intersection	CD	LOS	CD	LOS	Mitigation	CD	LOS	CD	LOS	
40	Ocean View Hills Pkwy./Del Sol Blvd.	67.8	**E**	67.3	**E**	+1 dedicated SB-R; restripe EB to L-LT-R	50.5	D	53.3	D	No
41	Ocean View Hills Pkwy./Street A	48.2	D	57.9	**E**	+1 NB-L; +1 dedicated EB-R	35.5	D	34.6	C	No
42	Old Otay Mesa Rd./Beyer Blvd.	381.2	**F**	396.5	**F**	+1 dedicated NB-R; +1 dedicated SB-R	194.3	**F**	181.8	**F**	**Yes**
43	Otay Mesa Rd./Corporate Center Dr.	119.3	**F**	184.3	**F**	Restripe SB to 2L-TRF-R; +1 dedicated EB-R	78.6	**E**	140.6	**F**	**Yes**
44	Otay Mesa Rd./Innovative Dr.	114.4	**F**	108.9	**F**	Restripe SB to 2L-TRF-R	113.7	**F**	89.8	**F**	**Yes**
45	Harvest Rd./Airway Rd.	116.7	**F**	13.8	B	+1 dedicated EB-R	42.5	D	13.5	B	No
46	Harvest Rd./Siempre Viva Rd.	76.6	**E**	69.2	**E**	+1 SB-L; +1 dedicated SB-R; +1 dedicated WB-R	28.7	C	51.5	D	No
47	Otay Mesa Rd./Sanyo Ave.	263.3	**F**	276.6	**F**	+1 NB-L; +1 dedicated NB-R; +2 dedicated EB-R; +1 dedicated WB-R	106.7	**F**	89.0	**F**	**Yes**
48	Airway Rd./Sanyo Ave.	225.6	**F**	229.8	**F**	+1 NB-L; +1 dedicated NB-R; +1 SB-L; +2 dedicated SB-R; +2 dedicated EB-R; +1 dedicated WB-R	49.7	D	38.6	D	No
49	Paseo de las Americas/Heinrich Hertz Dr.	988.3[3]	**F**	244.6[3]	**F**	Signalize; +1 NB-L	8.9	A	13.0	B	No
50	Paseo de las Americas/Marconi Dr.	869.6[4]	**F**	108.0[4]	**F**	Signalize; +1 SB-L	11.5	B	13.4	B	No
51	Heritage Rd./Otay Valley Rd.	516.4	**F**	837.9	**F**	+1 dedicated NB-R; +2 dedicated SB-R; +1 EB-L; +1 dedicated EB-R; +1 WB-L; +1 dedicated WB-R	178.7	**F**	382.7	**F**	**Yes**

TABLE 5.12-6
CPU HORIZON YEAR INTERSECTION LEVELS OF SERVICE
(continued)

		Horizon Year Plus CPU					Horizon Year Plus CPU With Mitigation				
		AM Peak Hour		PM Peak Hour			AM Peak Hour		PM Peak Hour		Significant After
	Intersection	CD	LOS	CD	LOS	Mitigation	CD	LOS	CD	LOS	Mitigation?
52	Aviator Rd./La Media Rd.	105.1	**F**	38.0	D	+1 dedicated SB-R	27.7	C	18.3	B	No
53	Otay Valley Rd./Avenida de las Vistas	764.4	**F**	298.6	**F**	-	-	-	-	-	**Yes**

SOURCE: Appendix J (Urban Systems Associates, Inc. 2012).
NOTE: Control delay results should be considered unreliable at delay volumes higher than two times the LOS E delay of 80.0 seconds.
*This is a suggested improvement and is not mitigation for a CPU impact.
[1]Vehicles queues may extend through this intersection from a downstream intersection, resulting in degraded LOS from vehicles blocking this intersection.
[2]Unsignalized: SB to WB right turn at LOS F (AM and PM peak hours)
[3]Unsignalized: eastbound left turn at LOS F (AM Peak Hour); eastbound left and right turns at LOS F (PM Peak Hour).
[4]Unsignalized: westbound left turn at LOS F (AM and PM Peak Hours); westbound right turn at LOS F (PM Peak Hour).
Bold indicates a significant impact.

Legend
CD = Control Delay
LOS = Level of Service
SB=Southbound
NB=Northbound
EB=Eastbound
WB=Westbound
L = left turn lane
T = through lane
R = right turn lane
S = shared lane
Dedicated= change from a shared lane to an exclusive dedicated lane

TABLE 5.12-7
CPU HORIZON YEAR FREEWAY SEGMENT LEVELS OF SERVICE

Segment		Lanes (1-Way)	Capacity	Horizon Year ADT	Peak Volume	V/C	LOS	Mitigation (with HOV lane)[1] V/C	Mitigation (with HOV lane)[1] LOS
SR-905	Picador Blvd. to I-805	2 + AUX	6,500	128,500	6,853	1.05	**F0**	0.83	D
	I-805 to Caliente Ave.	3 + CL	8,550	221,000	11,787	1.38	**F2**	1.13	**F0**
	Caliente Ave. to Heritage Rd.	3	7,050	196,000	10,453	1.48	**F3**	1.18	**F0**
	Heritage Rd. to Britannia Blvd.	3	7,050	173,000	9,227	1.31	**F1**	1.04	**F0**
	Britannia Blvd. to La Media Rd.	3	7,050	154,000	8,213	1.16	**F0**	0.92	D
	La Media Rd. to SR-125	3	7,050	103,500	5,520	0.78	C	-	-
	SR-125 to Siempre Viva Rd.	3	7,050	99,000	5,280	0.75	C	-	-
	Siempre Viva Rd. to Border	3	7,050	64,500	3,440	0.49	B	-	-
I-805	Main St. to Palm Ave.	4+AUX+2HOV	14,400	248,000	13,227	0.92	D	-	-
	Palm Ave. to SR-905	4+AUX+2HOV	14,400	222,000	11,840	0.82	D	-	-
	SR-905 to I-5	4	9,400	122,000	6,507	0.69	C	-	-
	I-5 to Border	6	14,100	135,500	7,227	0.51	B	-	-
SR-125	Birch Rd. to Lone Star Rd.	4 (Toll)	9,400	155,500	8,293	0.88	D	-	-
	Lone Star Rd. to SR-905	4 (Toll)	9,400	115,500	6,160	0.66	C	-	-
SR–11	SR-905 to Enrico Fermi Dr.	2	4,700	47,000	2,507	0.53	B	-	-
	Enrico Fermi Dr. to Siempre Viva Rd	2	4,700	24,500	1,307	0.28	A	-	-
	Siempre Viva Rd. to Border	2	4,700	39,500	2,107	0.45	B	-	-

SOURCE: Appendix J (Urban Systems Associates, Inc. 2012)
[1]SR-905 would include one HOV lane in each direction. Note that the addition of 1 HOV lane in each direction to SR-905 is not in the RTP and is not funded. The addition of 2 HOV lanes to I-805 is in the RTP and is funded, and is included in the Horizon Year baseline conditions.

ADT = average daily traffic
V/C = volume-to-capacity ratio
LOS = Level of service
Bold indicates a significant impact.

Freeway Ramp Metering

As shown in Table 5.12-8, 11 of the freeway ramp metering locations would be expected to experience delays in excess of 15 minutes in the Horizon Year Plus CPU condition. Out of these locations, the following five ramp meter locations would also experience a downstream freeway operation of unacceptable LOS E or F in the Horizon Year Plus CPU condition:

1. SR-905/Caliente Avenue WB on-ramp (AM and PM peak hours)
2. SR-905/Heritage Road WB on-ramp (PM peak hour)
3. SR-905/Britannia Boulevard WB on-ramp (AM and PM peak hours)
4. SR-905/Britannia Boulevard EB on-ramp (PM peak hour)
5. SR-905/La Media Road WB on-ramp (AM and PM peak hours)

The CPU impacts at these five ramp meter locations would be significant.

5.12.3.2 Significance of Impacts

a. Roadway Segments

A total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impact at all of these 24 roadway segment locations.

b. Intersections

A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition. Therefore, the CPU would have a significant impact at all 49 of these intersections.

c. Freeway Segments

With the planned and funded I-805 improvements, all I-805 freeway segments would be expected to operate at an acceptable LOS in the Horizon Year Plus CPU condition and therefore impacts would be less than significant. Five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition. Thus, the CPU impact at these five SR-905 freeway segments would be significant.

d. Freeway Ramp Metering

Five SR-905 freeway ramps would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition. The CPU impact at these five freeway ramps would be significant.

TABLE 5.12-8
CPU HORIZON YEAR RAMP METER OPERATIONS

Peak Hour	Location	Demand[1] (Veh/Hr)	Meter Rate[2] (Veh/Hr)	Excess Demand	Queue (Feet)	Delay[3] (Min)	Exceeds 15-Minute Delay?	Significant? (Exceeds 15 minutes and downstream freeway is LOS E or F)
AM	I-805/Palm Avenue NB (from WB)	1,280	960	320	8,000	20.0	Yes	No[4]
PM	I-805/Palm Avenue NB (from WB)	1,380	960	420	10,500	26.3	Yes	No[4]
AM	I-805/Palm Avenue NB (from EB)	655	960	None	None	None	No	No
PM	I-805/Palm Avenue NB (from EB)	540	960	None	None	None	No	No
AM	I-805/Palm Avenue SB	455	960	None	None	None	No	No
PM	I-805/Palm Avenue SB	645	960	None	None	None	No	No
AM	SR-905/Caliente Avenue WB	1,860	960	900	22,500	56.3	Yes	**Yes**
PM	SR-905/Caliente Avenue WB	1,550	960	590	14,750	36.9	Yes	**Yes**
AM	SR-905/Caliente Avenue EB	400	960	None	None	None	No	No
PM	SR-905/Caliente Avenue EB	400	960	None	None	None	No	No
AM	SR-905/Heritage Road WB	1,135	960	175	4,375	10.9	Yes	No
PM	SR-905/Heritage Road WB	2,550	960	1,590	39,750	99.4	Yes	**Yes**
AM	SR-905/Heritage Road EB	360	960	None	None	None	No	No
PM	SR-905/Heritage Road EB	800	960	None	None	None	No	No
AM	SR-905/Britannia Blvd. WB	1,350	960	390	9,750	24.4	Yes	**Yes**
PM	SR-905/Britannia Blvd. WB	3,355	960	2,395	59,875	149.1	Yes	**Yes**
AM	SR-905/Britannia Blvd. EB	710	960	None	None	None	No	No
PM	SR-905/Britannia Blvd. EB	1,400	960	440	11,000	27.5	Yes	**Yes**
AM	SR-905/La Media Road WB	2,050	960	1,090	27,250	68.1	Yes	**Yes**
PM	SR-905/La Media Road WB	3,025	960	2,065	51,625	129.0	Yes	**Yes**
AM	SR-905/La Media Road EB	1,000	960	40	1,000	2.5	No	No
PM	SR-905/La Media Road EB	1,950	960	990	24,750	61.8	Yes	No[4]
AM	SR-905/Siempre Viva Rd. NB	1,185	960	225	5,625	14.1	No	No
PM	SR-905/Siempre Viva Rd. NB	3,510	960	2,550	63,750	159.4	Yes	No[4]
AM	SR-905/Siempre Viva Rd. SB	750	960	None	None	None	No	No
PM	SR-905/Siempre Viva Rd. SB	1,670	960	710	17,750	44.4	Yes	No[4]
AM	SR-125/Otay Mesa Rd. NB	1,680	960	720	24,000	45.0	Yes	No[4]
PM	SR-125/Otay Mesa Rd. NB	2,455	960	1,495	37,375	93.4	Yes	No[4]
AM	SR-125/Lone Star Rd. NB	850	960	None	None	None	No	No
PM	SR-125/Lone Star Rd. NB	3,615	960	2,655	66,375	166.0	Yes	No[4]

SOURCE: Appendix J (Urban Systems Associates, Inc. 2012).
Bold indicates a significant impact.
[1]Total hourly volume entering from both directions.
[2]Most restrictive meter rate used, per Caltrans. This Veh/Hr assumes 2 lanes and 2 cars per green light on a 15-second cycle.
[3]$Delay = \frac{Excess\ Demand\ (vehicles)}{Meter\ Rate\ (vehicles\ per\ hour)}\ x\ 60\ min.per\ hour$
[4]While the delay exceeds 15 minutes, the downstream freeway operates at acceptable LOS. Thus, this impact is considered less than significant.

5.12.3.3 Mitigation Framework

At the program-level, impacts shall be reduced through the proposed classifications of roadways and identification of necessary roadway, intersection and freeway improvements. Mitigation or construction of these improvements shall be carried out at the project-level via the Public Facilities Financing Plan and future development projects. Funding shall be through construction by individual development projects, collection of FBA fees, fair share contributions to be determined at the project-level, and potentially other sources.

The following standards apply to the area designated for commercial and industrial uses as shown in Figure 3-9 (Project Description) within OM-CPIOZ. Future commercial and industrial development applications for properties identified on Figure 3-9 that are consistent with the CPU, the based zone regulations, and these supplemental regulations will be processed ministerially (CPIOZ A) in accordance with the procedures of the CPIOZ (Municipal Code Chapter 13, Article 2, Division 14). Development that complies with all of the following shall be processed as CPIOZ A: Development that includes construction of the abutting street(s) to the street classification identified in the Mobility Element of the Otay Mesa Community Plan and intersection configurations identified in Figures 5.12-4a-g; and development projects that can provide documentation from a California Registered Traffic Engineer, confirmed and accepted by the City Engineer, stating that the proposed project's traffic volumes are based on the City's trip generation rates and are less than 1,000 ADTs.

Development proposals that do not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone shall apply for a Process 3 CPIOZ Type B permit. Applications for a Process 3 CPIOZ Type B permit shall meet the purpose and intent of the regulations of the underlying zone and the supplemental regulations. Deviations from these regulations may be granted by the City Manager in accordance with the procedures of the CPIOZ (Municipal Code Section 132.1403).

a. Roadway Segments

Even with incorporation of the recommended street classifications in Table 5.12-4 in the CPU, Public Facilities Financing Plan, and future project development review and (ministerial) and discretionary review through the CPIOZ~~the proposed classifications~~, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition. The TIA identified additional potential improvement measures that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements ~~are detailed in the Findings and the Statement of Overriding Considerations~~include various factors such as adjacency to environmentally sensitive land and/or steep hillsides, existing development conflicts, and/or multi-modal and ~~urdan~~urban design context. The impacts are considered significant and ~~unavoidable~~unmitigated. At the project-level, partial mitigation may be possible in the

form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. 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.

The 24 roadway segments that would operate unacceptably in the Horizon Year plus CPU Condition are listed below.

1. Otay Mesa Road, Caliente Ave. to Corporate Center Dr.
2. Otay Mesa Road, Heritage Rd. to Cactus Rd.
3. Airway Road, Caliente Ave. to Heritage Rd.
4. Airway Road, Heritage Rd. to Cactus Rd.
5. Siempre Viva Road, Otay Center Dr. to SR-905
6. Siempre Viva Road, SR-905 to Paseo de las Americas
7. Caliente Avenue, Airway Rd. to Beyer Blvd.
8. Caliente Avenue, Beyer Blvd. to Siempre Viva Rd.
9. Heritage Road/Otay Valley Road, Main St. to Avenida de Las Vistas
10. Heritage Road/Otay Valley Road, Avenida de las Vistas to Datsun St.
11. Cactus Road, Otay Mesa Rd. to Airway Rd.
12. Cactus Road, Airway Rd. to Siempre Viva Rd.
13. Britannia Boulevard, SR-905 to Airway Rd.
14. La Media Road, SR-905 to Airway Rd.
15. Dennery Road, Black Coral Ln. to East End
16. Avenida de las Vistas, Vista Santo Domingo to Dennery Rd.
17. Del Sol Boulevard, Surf Crest Dr. to Riviera Pointe
18. Del Sol Boulevard, Riviera Pointe to Dennery Rd.
19. Old Otay Mesa Road, Crescent Bay Dr. to Beyer Blvd.
20. Camino Maquiladora, Heritage Rd. to Pacific Rim Ct.
21. Camino Maquiladora, Pacific Rim Ct. to Cactus Rd.
22. Progressive Avenue, Corporate Center Dr. to Innovative Dr.
23. Datsun Street, Innovative Dr. to Heritage Rd.
24. Exposition Way/Vista Santo Domingo, Avenida de las Vistas to Corporate Center Dr.

b. Intersections

A total of 49 intersections would be significantly impacted by the CPU. Even with incorporation of the recommended land configurations shown in Figure 5.12-4a-4g for the 53 intersections analyzed into the projects to be funded through the Public Facilities Financing Plan, and through future development projects (ministerial and discretionary through the CPIOZ~~With mitigation measures~~, a total of 39 intersections would continue

to be significantly impacted. The TIA identified further potential improvement measures such as additional intersection turning movement lanes that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements include considerations such as adjacency to environmentally sensitive land, steep hillsides, routes to schools, and multi-modal and urban design context, or because additional study would be required in order to make additional recommendationsare detailed in the Findings and Statement of Overriding Considerations. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future discretionary subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

The impacts are considered significant and unavoidableunmitigated. To reduce impacts the following mitigation shall be provided:

TRF-1: Intersections shall be improved per the intersection lane designations identified in Figures 5.12-4a-g.

c. Freeway Segments

While providing one HOV lane in each direction on the SR-905 would reduce impacts associated with buildout of the CPU, the additional lanes are not funded; therefore, impacts would remain significant and unavoidable unmitigated at the programmatic level. At the project-level, partial mitigation may be possible in the form of auxiliary lanes and/or transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future discretionary subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

d. Freeway Ramp Metering

Mitigation that would reduce freeway ramp metering impacts at the five significantly impacted SR-905 locations consists of adding a lane to the freeway on-ramp, auxiliary lanes, and/or implementation of transportation demand management (TDM) measures that encourage carpooling and other alternate means of transportation. At the time future discretionarysubsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

Map Source: Urban Systems Associates, Inc. 2012

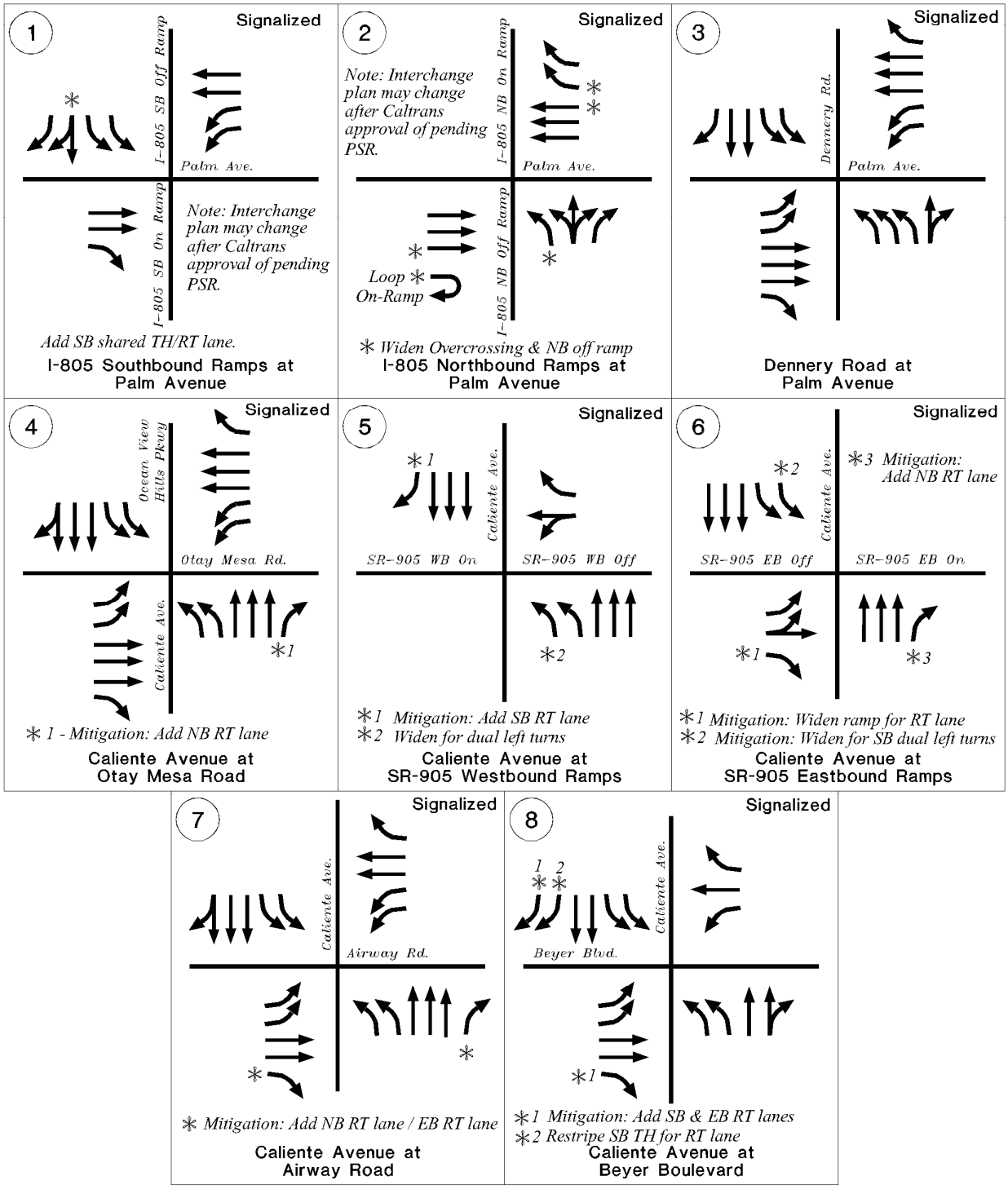


FIGURE 5.12-4a

Buildout Lane Configurations 1-8

Map Source: Urban Systems Associates, Inc. 2012

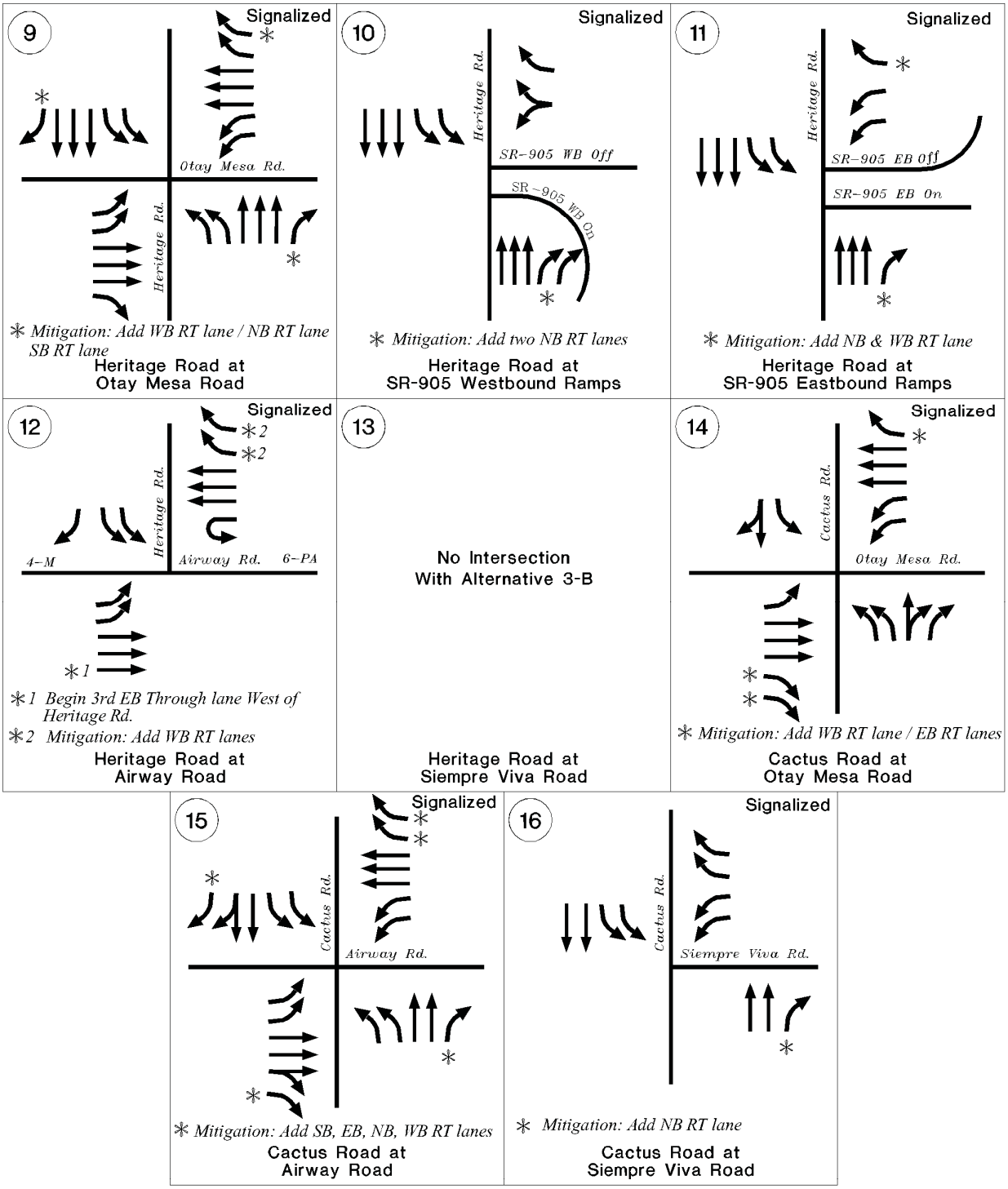


FIGURE 5.12-4b

Buildout Lane Configurations 9-16

Map Source: Urban Systems Associates, Inc. 2012

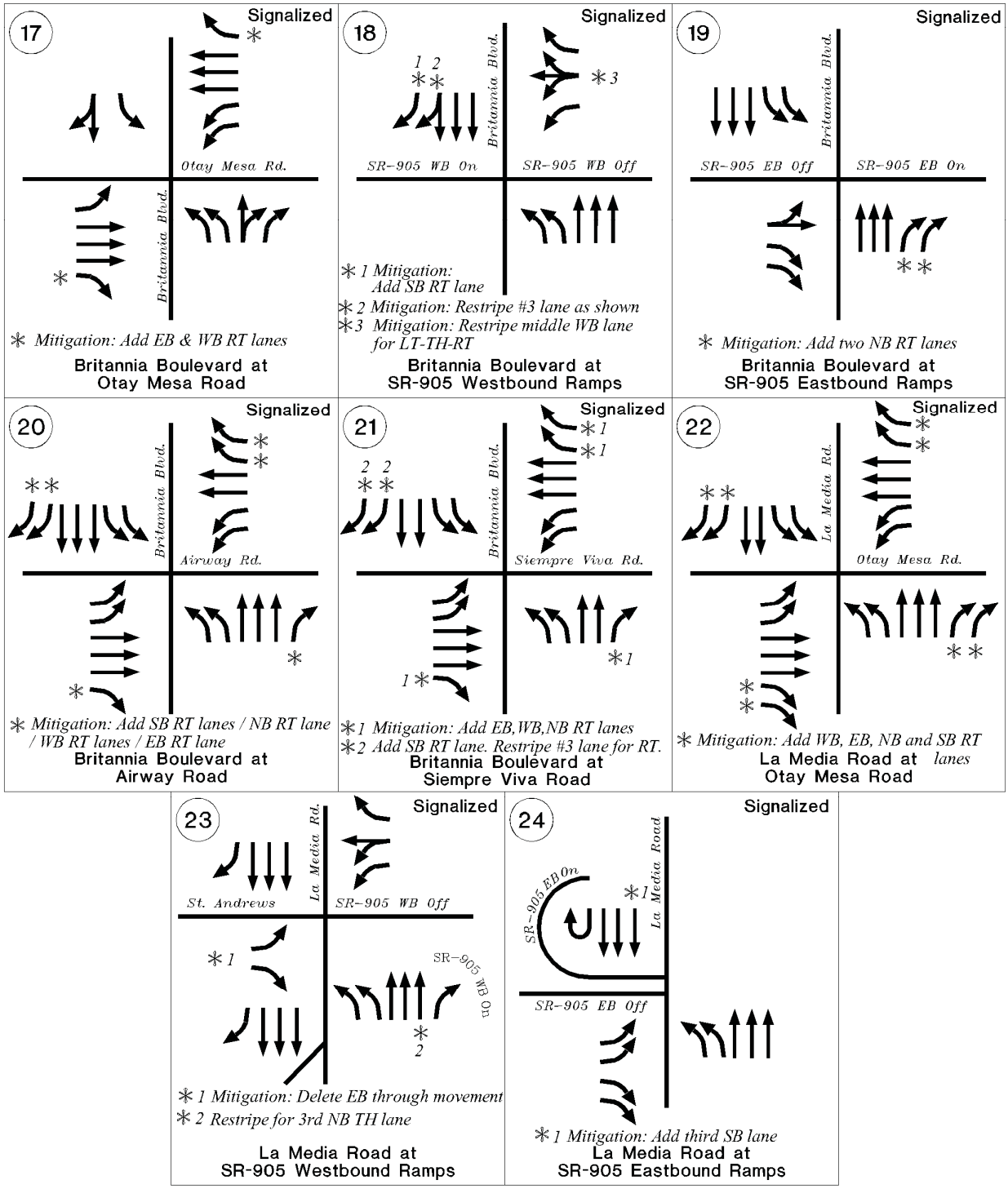


FIGURE 5.12-4c

Buildout Lane Configurations 17-24

Map Source: Urban Systems Associates, Inc. 2012

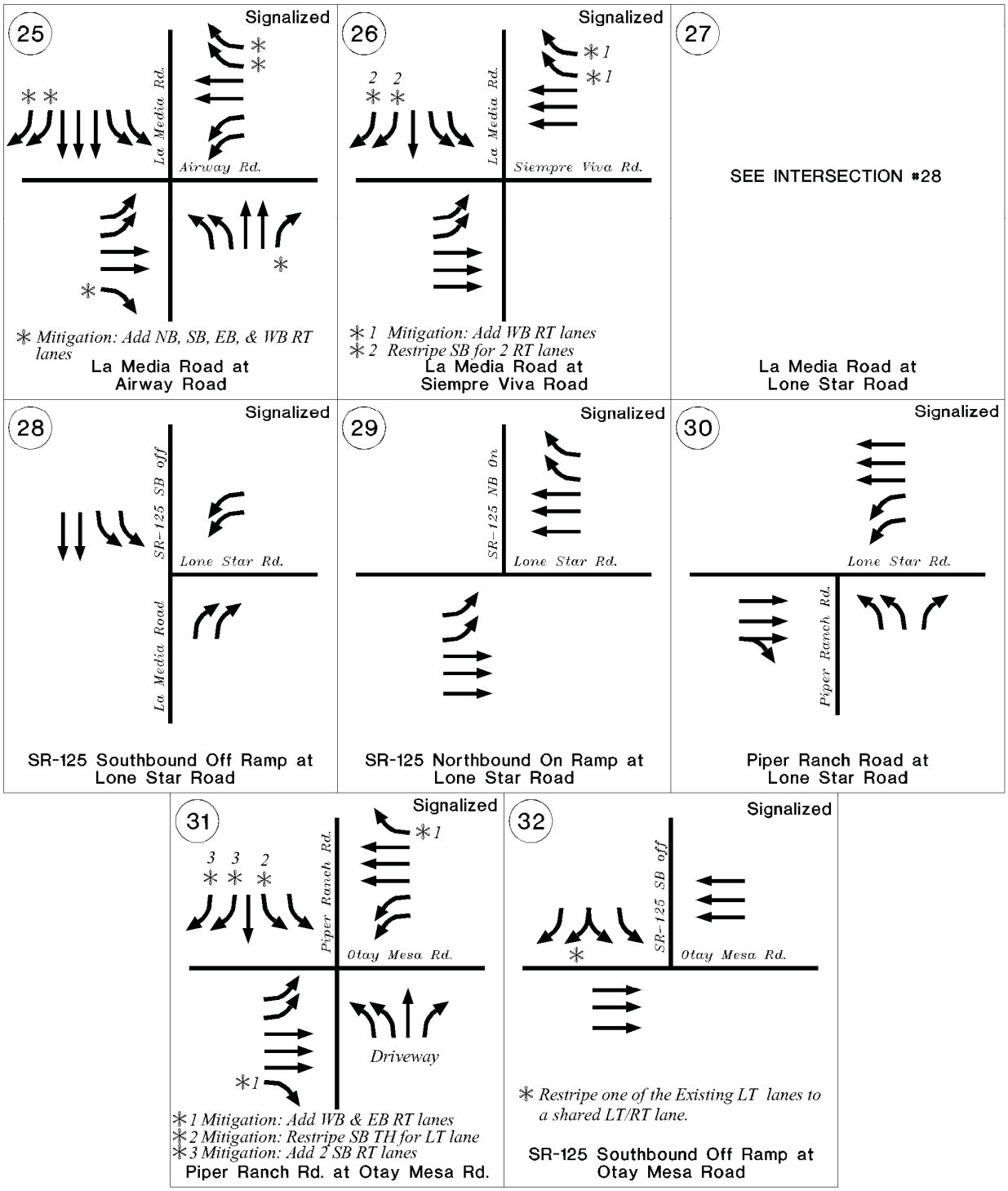


FIGURE 5.12-4d

Buildout Lane Configurations 25-32

Map Source: Urban Systems Associates, Inc. 2012

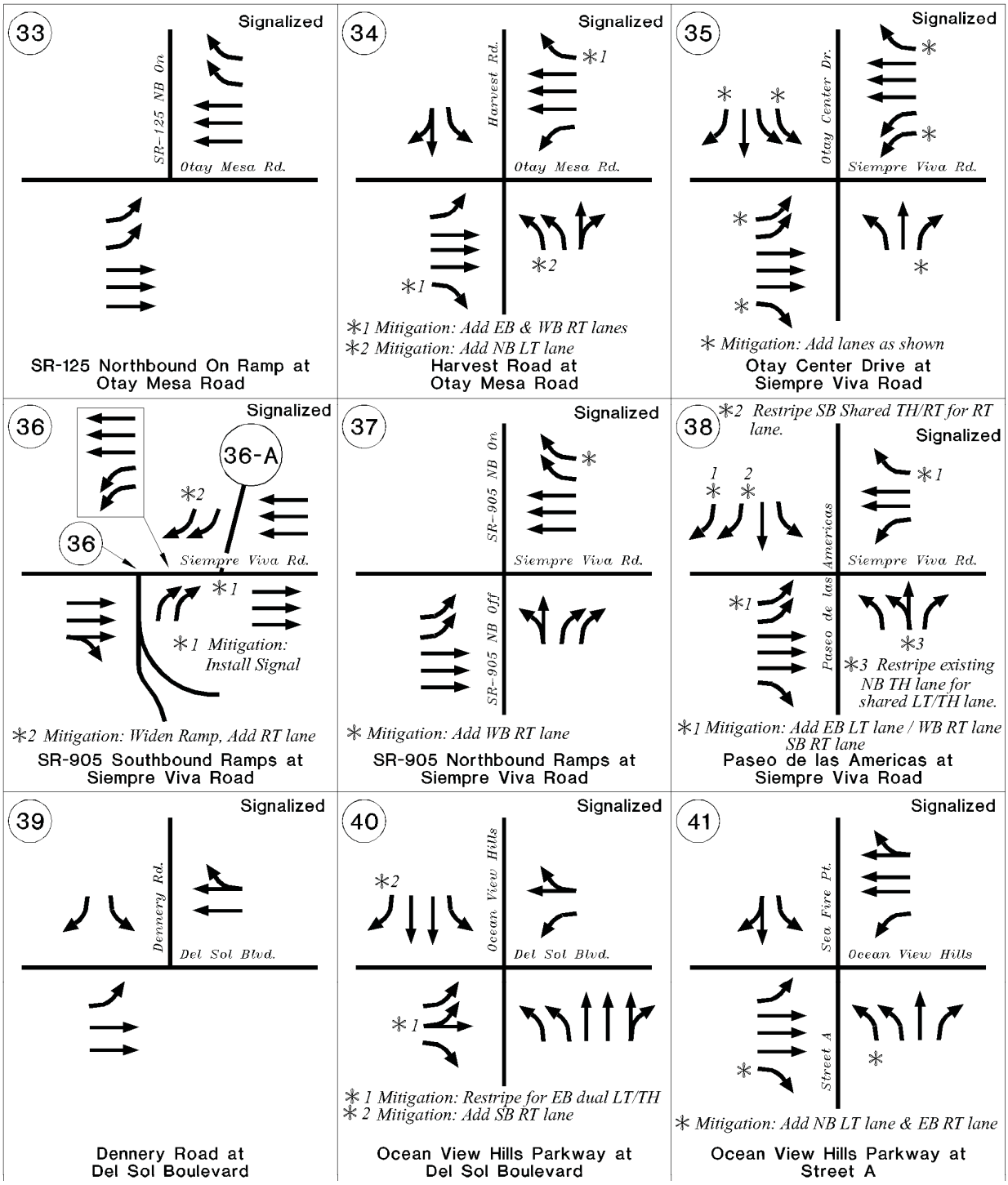


FIGURE 5.12-4e

Buildout Lane Configurations 33-41

Map Source: Urban Systems Associates, Inc. 2012

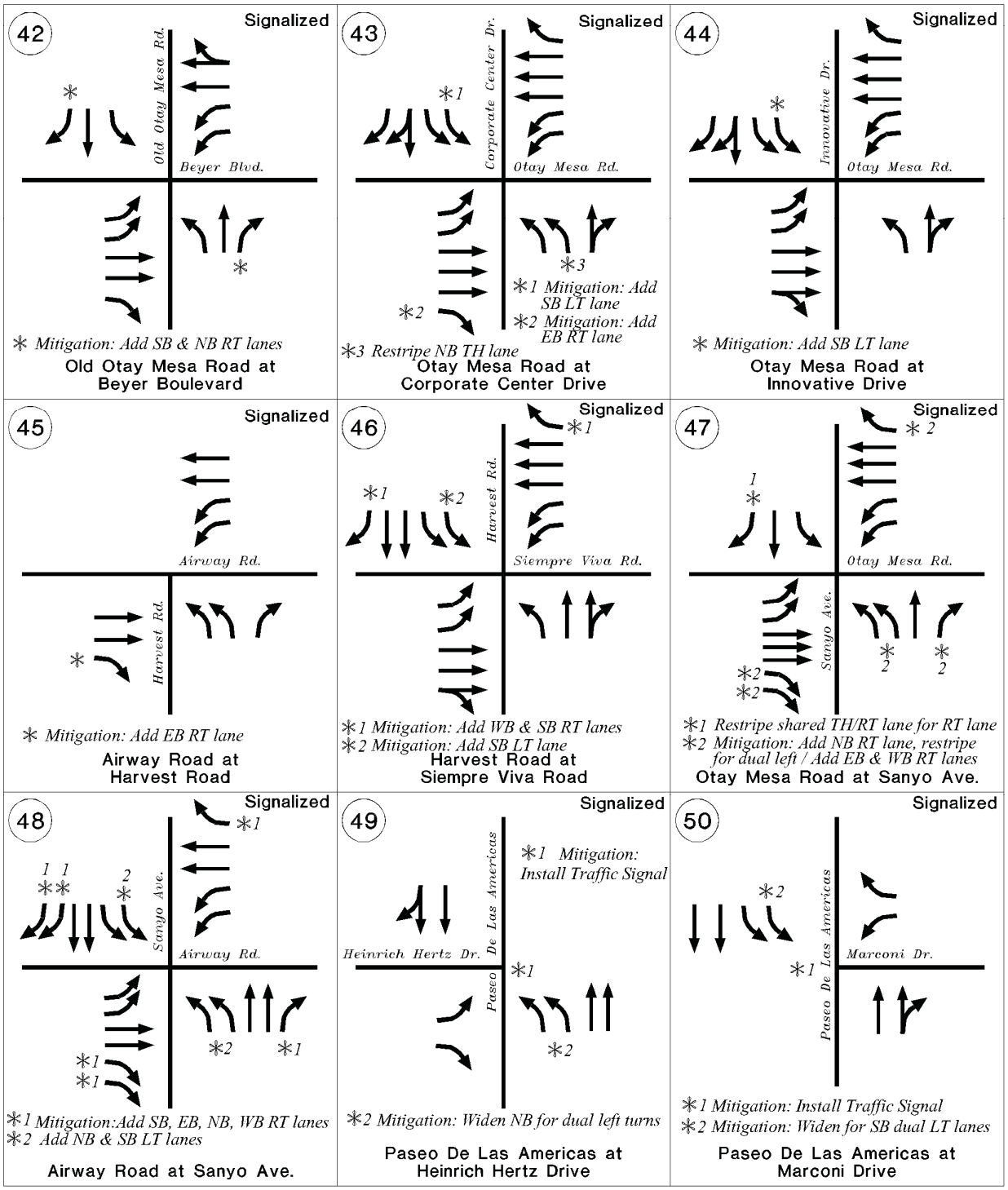


FIGURE 5.12-4f

Buildout Lane Configurations 42-50

Map Source: Urban Systems Associates, Inc. 2012

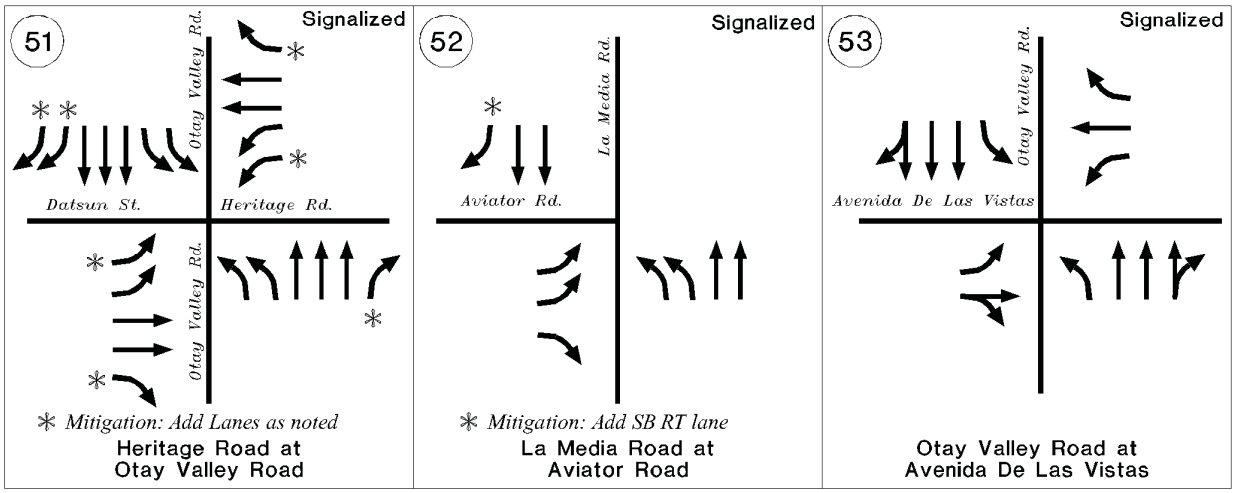


FIGURE 5.12-4g

Buildout Lane Configurations 51-53

However, due to the uncertainty associated with implementing freeway ramp improvements, and uncertainty related to implementation of TDM measures, the freeway ramp impacts associated with the CPU would remain significant and ~~unavoidable~~ unmitigated at the program-level.

5.12.3.4 Significance After Mitigation

a. Roadway Segments

Implementation of roadway segment improvements proposed as part of the CPU (see Section 5.12.3.1(a) above) would resolve several traffic impacts that would occur under the Horizon Year. However, 24 significant impacts as shown in Table 5.12-5 would remain ~~unavoidable~~unmitigated and would operate unacceptably in the Horizon Year plus CPU Condition as shown below~~.~~:

1. Otay Mesa Road, Caliente Ave. to Corporate Center Dr.
2. Otay Mesa Road, Heritage Rd. to Cactus Rd.
3. Airway Road, Caliente Ave. to Heritage Rd.
4. Airway Road, Heritage Rd. to Cactus Rd.
5. Siempre Viva Road, Otay Center Dr. to SR-905
6. Siempre Viva Road, SR-905 to Paseo de las Americas
7. Caliente Avenue, Airway Rd. to Beyer Blvd.
8. Caliente Avenue, Beyer Blvd. to Siempre Viva Rd.
9. Heritage Road/Otay Valley Road, Main St. to Avenida de Las Vistas
10. Heritage Road/Otay Valley Road, Avenida de las Vistas to Datsun St.
11. Cactus Road, Otay Mesa Rd. to Airway Rd.
12. Cactus Road, Airway Rd. to Siempre Viva Rd.
13. Britannia Boulevard, SR-905 to Airway Rd.
14. La Media Road, SR-905 to Airway Rd.
15. Dennery Road, Black Coral Ln. to East End
16. Avenida de las Vistas, Vista Santo Domingo to Dennery Rd.
17. Del Sol Boulevard, Surf Crest Dr. to Riviera Pointe
18. Del Sol Boulevard, Riviera Pointe to Dennery Rd.
19. Old Otay Mesa Road, Crescent Bay Dr. to Beyer Blvd.
20. Camino Maquiladora, Heritage Rd. to Pacific Rim Ct.
21. Camino Maquiladora, Pacific Rim Ct. to Cactus Rd.
22. Progressive Avenue, Corporate Center Dr. to Innovative Dr.
23. Datsun Street, Innovative Dr. to Heritage Rd.
24. Exposition Way/Vista Santo Domingo, Avenida de las Vistas to Corporate Center Dr.

b. Intersections

Implementation of intersection improvements identified in TRF-1 above, would occur in conjunction with future development within the CPU area and with implementation of Public Facilities Financing transportation projects. The improvements would reduce significant impacts to below a level of significance at the following ten intersections (see Table 5.12-6):

- Palm Avenue/I-805 NB Ramps
- Otay Mesa Road/Piper Ranch Road
- Ocean View Hills Parkway/Del Sol Boulevard
- Ocean View Hills Parkway/Street A
- Harvest Road/Airway Road
- Harvest Road/Siempre Viva Road
- Airway Road/Sanyo Avenue
- Paseo de las Americas/Heinrich Hertz Drive
- Paseo de las Americas/Marconi Drive
- Aviator Road/La Media Road

The remaining 39 intersections would continue to operate at unacceptable levels with the proposed mitigation. Additional intersection mitigation measures are not desirable and not recommended as discussed in the Findings and Statement of Overriding Considerations. Additional mitigation such as TDM measures may be identified in the future at the project-level. Thus, these impacts would remain significant and not fully mitigated at the program-level.

c. Freeway Segments

The CPU would significantly impact five segments of SR-905. Caltrans has designed the SR-905 to allow for the construction of HOV lanes, which would reduce the CPU impacts to below a level of significance at two of the five impacted freeway segments identified in Table 5.12-7. However, the addition of HOV lanes to SR-905 is not a funded or planned project at this time and improvements to these facilities cannot be guaranteed to be implemented by the City. Additional mitigation such as TDM measures may be identified in the future at the project-level. Thus, at the program-level, CPU impacts to the five SR-905 freeway segments would remain significant and unmitigated.

d. Freeway Ramp Metering

As discussed above under 5.12.3.3(d), due to the uncertainty associated with implementing freeway improvements, limitations on increasing ramp capacity, and uncertainty regarding implementation of TDM measures, the freeway ramp impacts associated with the CPU identified in Table 5.12-8 would remain significant and unmitigated at the program-level.

5.12.4 Issue 2: Traffic Hazards

Would the project result in an increase in traffic hazards for motor vehicles, bicyclists, or pedestrians?

5.12.4.1 Impacts

The CPU is intended to create a balanced and safe multi-modal transportation network. As a part of this effort, the residential and industrial interfaces have been reduced and designated truck routes have been established (refer to Figure 3-7) to avoid the potential transportation conflicts caused by large haul trucks on residential and other streets where pedestrian use is expected to be heavy. Where an interface of International Business and Trade and residential designations would be allowed, policies have been established to require a gradual transition between residential and industrial uses that would reduce traffic conflicts (see Section 5.1.4.1).

All roadway improvements that would occur as part of CPU implementation would be constructed to City standards, including standards for sight distance, turning radii, speed limits, etc., and to the satisfaction of the City Engineer. Therefore, implementation of the CPU would not result in an increase in traffic hazards for motor vehicles, bicyclists or pedestrians.

5.12.4.2 Significance of Impacts

All roadway improvements would be designed and constructed in accordance with the CPU Mobility Element roadway network satisfactory to the City Engineer. Additionally, the CPU includes policies that would reduce potential conflicts between vehicle, pedestrian, and bicyclists. Conformance to City design standards and CPU policies would reduce impacts associated with traffic hazards to motor vehicles, bicyclists, or pedestrians to below a level of significance.

5.12.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.12.4.4 Significance After Mitigation

Impacts would be less than significant.

5.12.5 Issue 3: Circulation and Access

Would the CPU create alterations to present circulation movements in the area including effects on existing public access points?

5.12.5.1 Impacts

As discussed in Section 5.12.3.1 above, the CPU proposes alterations to the existing circulation system through roadway reclassifications within the CPU area. Buildout of the CPU would result in increased circulation capacity and access for vehicles, bicycles, and pedestrians (see Figures 3-3). The existing Otay Mesa POE and Brown Field access would be maintained.

Temporary closures with detours may be required during street improvements and would be addressed through traffic control plans in accordance with City policy as construction plans for future projects are processed through the City. No existing public access points would be permanently closed as part of CPU implementation.

5.12.5.2 Significance of Impacts

The CPU would not create alterations to present circulation movements in the area including existing public access points therefore impacts would be less than significant.

5.12.5.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.12.5.4 Significance after Mitigation

Impacts would be less than significant.

5.12.6 Issue 4: Alternative Transportation

Would the CPU conflict with the adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?

5.12.6.1 Impacts

a. Network Configuration

The CPU includes plans for a pedestrian, transit, and bicycle transportation network (see Figures 3-2, 3-3, 3-5 and 3-6). With implementation of the CPU, Airway Road would serve as the principal community transportation and activity corridor. An east-west high frequency bus corridor is proposed to link between the South Bay bus rapid transit (BRT) and San Diego Trolley. The transit route that travels along Airway Road would link villages, employment centers, and Southwestern College within Otay Mesa. Additional right-of-way for Airway Road would provide the option for dedicated transit lanes or other transit priority measures. Additionally, a north-south BRT route is planned on SR-125 and SR-905 from the Otay Mesa POE north.

All local bus service within the CPU area would remain with implementation of the CPU. The BRT along the SR-125 and other bus routes in the CPU would continue to be operated by MTS. While the CPU takes into consideration future bus service, the future bus service to the area would be developed and provided by MTS. Changes to MTS bus service are out of the control of the Lead Agency (City).

The CPU would provide several more designated bicycle routes compared to the existing network, including a completely connected path along Airway Road; extending the Siempre Viva route; a connection from Otay View Hills Parkway through Caliente and Beyer; extension from Dennery Road through Ave de las Vistas/Exposition/ Corporate Center Drive to Otay Mesa Road; a route around the airport to Lone Star Road; and extended north-south routes on Cactus Road, Britannia, and La Media. Existing pedestrian paths are connected within the residential/commercial areas in the western plan area; however, the eastern plan area pedestrian network is fragmented and inconsistent. Buildout of the CPU would improve this condition by providing a connected pedestrian sidewalk along roadways. The proposed mixed-use areas would be designed to increase walkability. In this way, the CPU would positively affect alternative transportation.

b. CPU Goals and Policies

The CPU includes several goals and policies to promote alternative transportation consistent with the General Plan (see Section 5.12.1.1 for a summary of these goals and policies). The City of San Diego General Plan promotes alternative transportation through mixed-use villages, walkability, designs to promote transit, and bicycle access and transportation. As discussed in the Mobility Element (Chapter 3), the CPU includes the following alternative transportation goals:

- A pedestrian sidewalk and trails network that allows for safe and comfortable walking throughout the community.
- An effective transit network that provides fast and reliable service to local and regional destinations.
- A complete and interconnected street system that balances the needs of drivers, bicyclists, pedestrians, and others.
- A bicycle commuter network that links residents to transit, recreational, educational, and employment opportunities within the community.
- Transportation infrastructure and operations investments that facilitate goods movement and international travel, while fostering economic prosperity and a high quality of life within the community.

- Support for public health goals to increase the potential for walking and other forms of exercise to be incorporated into everyday life.

To implement these goals, the CPU includes a series of policies. Many of these policies promote alternative transportation by ensuring that such transportation would be safe, as detailed in Section 5.12.4 above. Also, several policies promote the future availability of transit, alternative transportation convenience (including connectivity and speed), and the appeal of alternative transportation. These policies include:

3.1-1 Provide a sidewalk and trail system with connections to villages, activity centers, and open spaces.

3.1-4 Enhance street or pedestrian connections within industrial superblocks through exterior improvements such as public art, pedestrian scale windows, entrances, signs, street furniture, landscape, and plazas.

3.1-5 Implement the Community Plan to contribute to more walkable, tree-lined streets, using identified drought-tolerant species.

3.2-1 Encourage SANDAG and MTS to expand transit investments and service in Otay Mesa.

3.2-2 Implement transit priority measures such as queue jumpers and signal priority measures to allow transit to bypass congestion and result in faster transit travel times at critical locations.

3.2-4 Emphasize transit orientation in village development plans including but not limited to those identified on the Community Plan Land Use Map, Community Plan Figure 2-1. See also OMCP Urban Design Element.

3.4-1 Refine and implement the Bicycle Master Plan in the Otay Mesa Community Plan area.

3.4-2 Provide multi-use trails in a manner consistent with the MSCP~~, including but not limited to the following locations~~ (see ~~also~~ Recreation Element, Trails Figure 7-1). ~~Please n~~Note that south of Otay Mesa Road these alignments are conceptual, with trail head areas and trail alignments being required with future specific plans.

All of these CPU policies and goals would be consistent with the City of San Diego's General Plan.

5.12.6.2 Significance of Impacts

The CPU would be consistent with existing policies supporting alternative transportation modes. There would be no conflict and, thus, there would be no impact.

5.12.6.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.12.6.4 Significance After Mitigation

Impacts would be less than significant.

5.13 Public Services

Public services are those functions that serve residents on a communitywide basis. Existing conditions for public services are included under Section 2.4, Public Infrastructure in the Environmental Setting. These functions include parks and recreation, libraries, schools, and fire and police protection. The following provides a discussion of these services and facilities as they relate to the CPU. This section is based on letters prepared by the service providers, which are included in Appendix K of this EIR. The locations of existing and planned facilities are shown on Figure 5.13-1.

5.13.1 Existing Conditions

5.13.1.1 Fire Protection

Fire protection services to the CPU area are provided by the City's Fire-Rescue Department (SDFD). The General Plan states that fire stations should be sited on lots that are at least three-quarters of an acre with room for expansion within two to two and a half miles apart and be staffed and equipped to respond to calls within their established standards. The SDFD's goal is one firefighter per 1,000 citizens. To ensure adequate fire protection response to fire calls, the SDFD adheres to national standards, which require an initial response of fire suppression resources, a four-person engine company, within 5 minutes, and an effective fire force, 15 firefighters, within 9 minutes of a call. In addition, emergency medical services (EMS) has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls.

The SDFD currently utilizes a four-level priority calls dispatch system. Level 1 is the most serious (e.g., heart attack, shortness of breath), and the closest fire engine and an advanced life support ambulance respond to this type of call. In this case, the fire crew response goal is within 8 minutes of being dispatched, and the ambulance response goal is within 12 minutes for Level 1 (the most serious) calls. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advanced life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call (e.g., someone having extended flu-like symptoms), either a basic or advanced life support ambulance would respond. A basic ambulance is staffed with two EMTs, whereas an advanced life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (e.g., the patient could have driven him- or herself to a hospital), a basic ambulance would respond within 18 minutes of being dispatched. EMS is under contract to meet the 12- or 18-minute response times at least 90 percent of the time.

Fire station No. 43, located on the eastern end of Brown Field at 1590 La Media Road, serves the eastern portion of the CPU area. As of 2011, the western portion of the community, north of I-905, is served by Fire Station No. 6, located in the adjacent Otay Mesa-Nestor community planning area. The remaining portion of the CPU area, south of I-905, is served by Fire Station No. 29, located in the San Ysidro community planning area. Each fire station is equipped with at least one engine and four firefighters per day, per shift.

Table 5.13-1 shows the average response times for all calls for Fiscal Year (FY) 2011 for each of the fire stations that serve the CPU area, as well as the number of incidents responded to.

TABLE 5.13-1
FIRE STATION RESPONSE TIMES AND INCIDENTS

Fire Station	FY2011 Average Response Time (minutes)	FY2011 Incidents Responded To
Fire Station 43*	7.25	570
Fire Station 6*	5.19	1,671
Fire Station 29		
Engine	5.06	1,441
Truck	5.09	1,618

SOURCE: SDFD 2011.
*Fire Stations No. 43 and 6 are only equipped with a single engine.

5.13.1.2 Police Protection

The CPU area is within the boundaries of Beat 713 of the San Diego Police Department's Southern Division. Southern Division, located at 1120 27th Street, provides police services to the following communities: Egger Highlands, Palm City, Nestor, Otay Mesa West, Ocean Crest, Tijuana River Valley, San Ysidro, Border, and Otay Mesa. The SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County.

Southern Division is currently staffed with 84 sworn personnel and 1 civilian employee. The current patrol strength at Southern Division is 79 uniformed patrol officers (SDPD, pers. comm. with Lieutenant Kevin Mayer 2013). Officers work 10-hour shifts. Staffing is composed of three shifts that operate from 6:00 A.M. – 4:00 P.M. (First Watch), 2:00 P.M. – 12:00 A.M. (Second Watch), and from 9:00 P.M. – 7:00 A.M. (Third Watch). Using the department's recommended staffing guidelines, Southern Division currently deploys a minimum of 9 patrol officers on First Watch, 11 officers on Second Watch, and 7 officers on Third Watch.

Map Source: City of San Diego

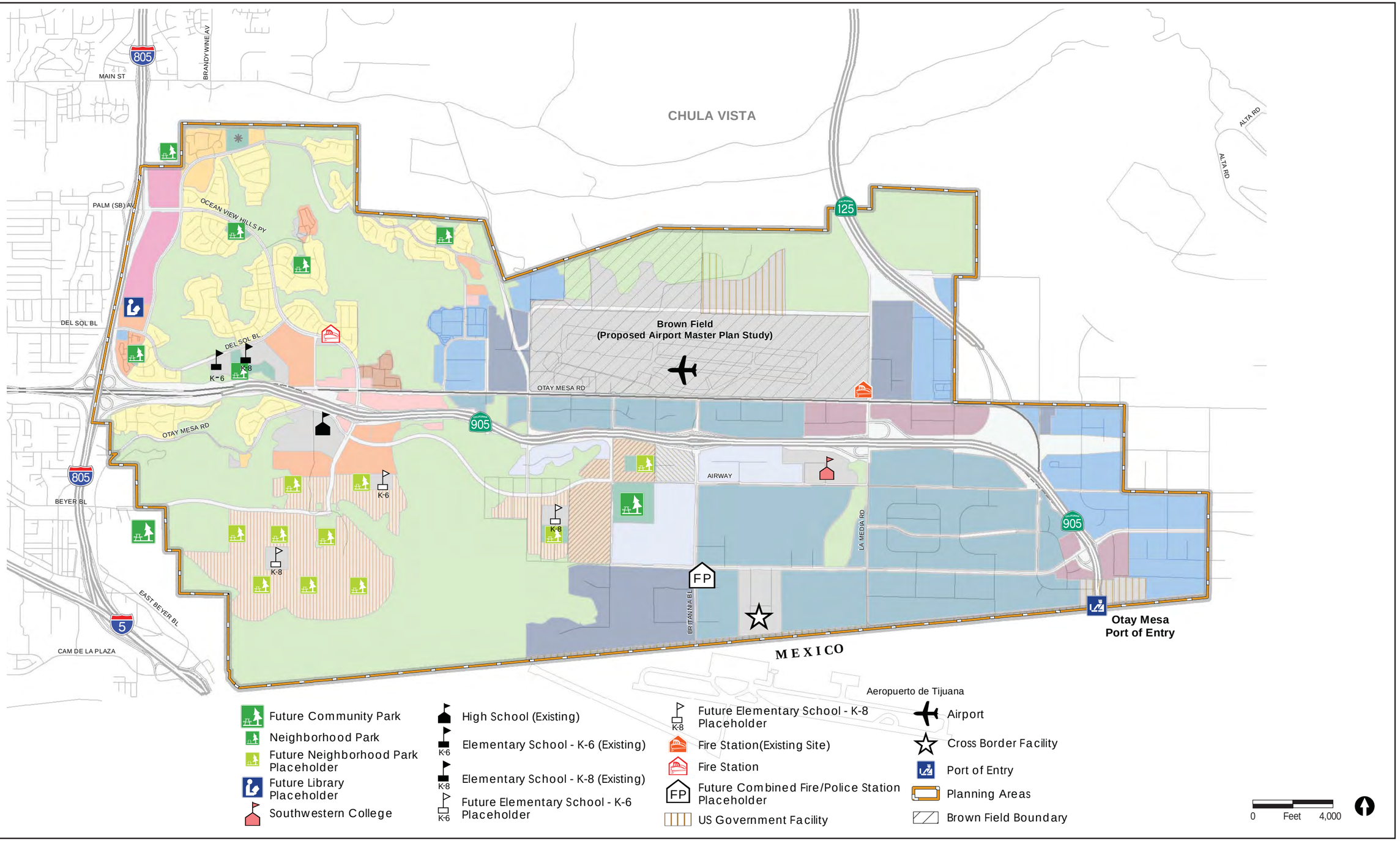


FIGURE 5.13-1
Community Facilities

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The SDPD does not staff individual stations based on ratios of sworn officers per 1,000-population ratio. The goal citywide is to maintain 1.48 officers per 1,000 population ratio. The SDPD is currently reaching its targeted staffing ratio of 1.48 sworn officers per 1,000 residents, based on 2011 estimate residential population of 1,311,882. The ratio is calculated to take into account all support and investigative positions within the SDPD. This ratio does not include the significant population increase resulting from citizens who commute to work from outside of the City or those visiting.

The SDPD currently utilizes a five-level priority calls dispatch system, which includes Priority E (Emergency), One, Two, Three, and Four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury. Priority Two calls include vandalism, disturbances, and property crimes. Priority Three includes calls after a crime has been committed, such as cold burglaries and loud music. Priority Four calls include parking complaints or lost and found reports.

Table 5.13-2 shows the year 2011 average response times for each priority level call within Beat 713. Also included in Table 5.13-2 are the citywide averages and police department goal response times.

TABLE 5.13-2
POLICE RESPONSE TIMES
(minutes)

Call Types	Beat 713 Average Response Times	Citywide Average Response Times	Department Goal Response Times
Emergency	8.3	6.6	7
Priority One	18.6	12.1	14
Priority Two	31.4	25.2	27
Priority Three	71.3	67.4	70
Priority Four	65.5	66.7	70

SOURCE: SDPD, personal communication with Lieutenant Kevin Mayer, January 11, 2013.

As shown in Table 5.13-2, the average response times for Beat 713 exceed the citywide average and department's goals for all calls, except Priority Four. The SDPD strives to maintain the response time goals as one of various other measures used to assess the level of service to the community.

5.13.1.3 Schools

The student population within the CPU area is served by the Sweetwater Union High School District (SUHSD), Chula Vista Elementary School District (CVESD), and San

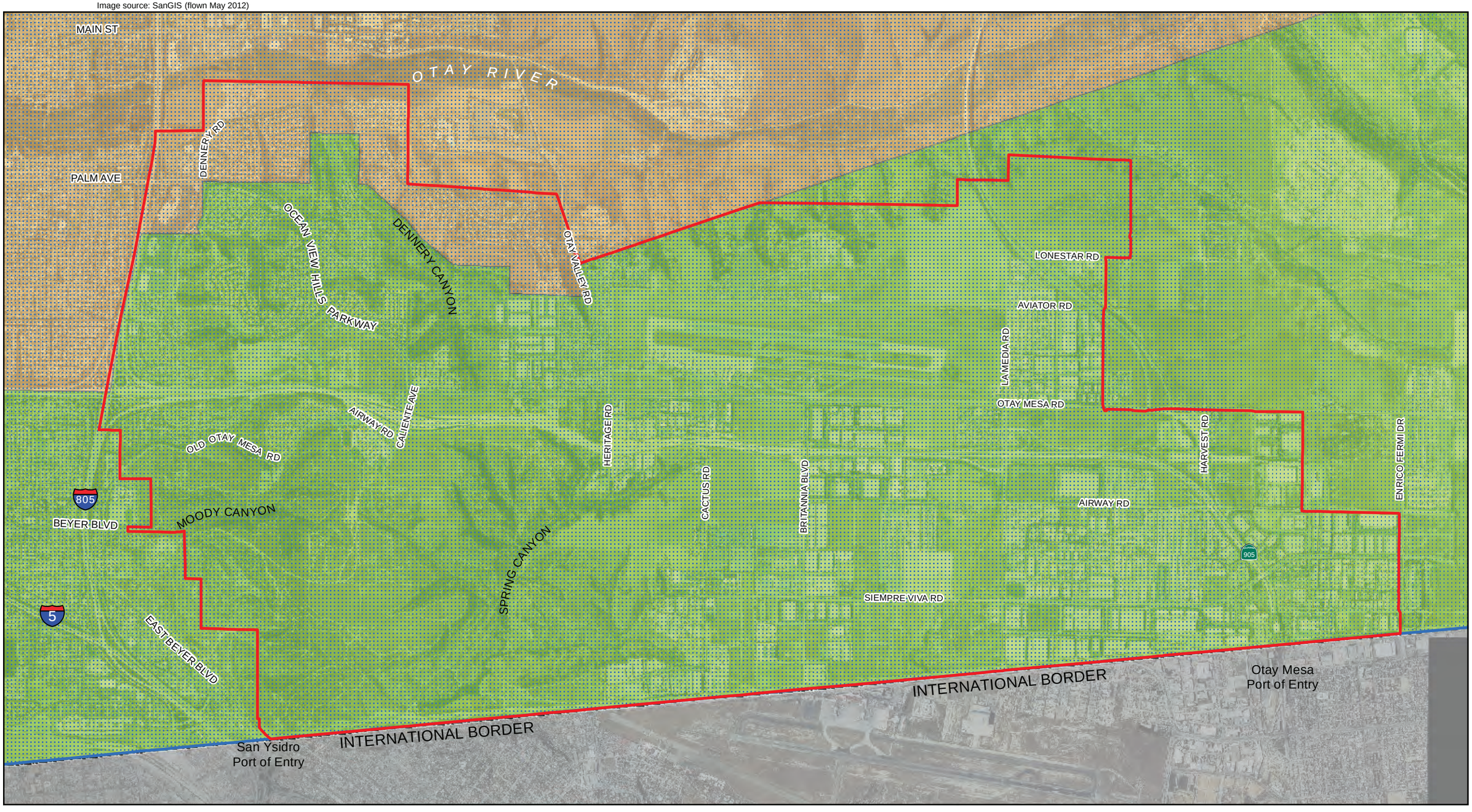
Ysidro School District (SYSD), as discussed below. Figure 5.13-2 shows the boundaries of each school district within the CPU area.

San Ysidro School District. SYSD serves the majority of the CPU area and extends easterly to the San Ysidro Mountains, covering areas within the jurisdiction of both the City and County of San Diego. The district has five elementary schools, one "paired" school, and one middle school (SYSD 2011). The paired school serves students in grades K-8, eliminating the need for a separate middle school. The schools within the SYSD that serve the CPU area are Beyer Elementary School (K-5), La Mirada Elementary School (K-5), Ocean View Hills (K-8), Smythe Elementary School (K-5), Sunset Elementary School (K-5), Willow Elementary School (K-5), and San Ysidro Middle School (6-8). The only SYSD school within the CPU area is Ocean View Hills (K-8), located at 4919 Del Sol Boulevard.

Chula Vista Elementary School District. CVESD serves a small northwestern portion of the CPU area. This district operates 34 schools, none of which are located within the CPU area.

Sweetwater Union High School District. SUHSD operates 18 junior and senior high schools and ancillary programs. The only SUHSD facility within the CPU area is the San Ysidro High School, located at 5333 Airway Road, just south of SR-905 in the western portion of the plan area. In addition, all middle school students not within SYSD attend Montgomery Middle School; Montgomery High School temporarily provides service for grades 9 through 12 for the portion of the CPU area between Del Sol Boulevard and I-805 and I-905 (SUHSD, pers. com. with Paul Woods, 2010). SUHSD also operates the San Ysidro Adult School near I-805 at the western edge of the CPU area. San Ysidro Adult School provides English language acquisition, literacy, adult secondary, and vocational education.

Image source: SanGIS (flown May 2012)



0 Feet 2,500

Otay Mesa Community Plan Boundary
Sweetwater Union High School District
Chula Vista Elementary School District
San Ysidro Elementary School District

FIGURE 5.13-2

School Districts within the CPU Area

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Table 5.13-3 provides a summary of the enrollment status and capacity of the existing schools in the three districts which serve the CPU area.

TABLE 5.13-3
ENROLLMENT AND CAPACITY FOR SCHOOLS SERVING THE CPU AREA

School	Grades	2010-2011	Capacity
San Ysidro School District (SYSD)			
La Mirada Elementary School	K-5	528	642
Ocean View Hills School	K-8	1,211	1,001
Smythe Elementary School	K-8	536	924
Sunset Elementary School	K-6	758	888
Willow Elementary School	K-6	842	876
San Ysidro Middle School	7-8	894	1,022
Beyer Elementary School	K-6	372	774
Chula Vista Elementary School District (CVESD)			
Juarez Lincoln Accelerated	K-6	647	800
Sweetwater Union High School District (SUHSD)			
Montgomery Middle School	7-8	875	1,170
Montgomery High School	9-12	1,604	2,284*
San Ysidro High School	9-12	2,412	2,688*

SOURCE: SYSD, CVESD, and SUHSD 2010–2011 enrollment data from California Department of Education 2011.
SUHSD capacity data from SUHSD, November 2010.
*Includes temporary, portable schools.

In addition to the schools addressed above, Southwestern College Higher Education Center opened in the fall of 2007 in the southeastern portion of the CPU area near the corner of La Media and Airway Road. The new facility offers general education and occupational courses and has a capacity to serve up to 5,000 students. Signature programs offered include police academy, nursing, environmental technology, fire science technology, and paramedic and emergency medical technician.

5.13.1.4 Parks and Recreation

There are currently 2,624 acres combined of parkland and open space (54 and 2,570 acres, respectively) within the CPU area (City of San Diego 2011a). This acreage is composed of neighborhood, community, and resource-based parks, as well as open space lands which provide recreation opportunities.

Parks are categorized as resource-based and population-based. Resource-based parks are located at the site of distinctive scenic, natural, or cultural features and are intended for citywide use. Areas within resource-based parks may be developed with trails, sports fields, and recreational facilities. Population-based parks are usually located in close proximity to residential development or school facilities and are categorized as neighborhood parks and community parks depending on their size and the area they serve.

a. Population-based Parks and Facilities

The City's Park and Recreation Department maintains more than 40,000 acres of developed and undeveloped open space and parkland categorized as population-based parks, resource-based parks, and open space. The physical facilities, plus classes, programs, and activities at these facilities constitute San Diego's municipal recreation system.

The General Plan park standard is to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents, or a combination of usable acreage and park equivalencies. It is noted that joint use agreements can be executed with the school district to obtain credit for park area associated with schools.

Usable acres means a graded pad not exceeding 2 percent rough grade, or gently sloping land not exceeding 10 percent grade, as required to provide for structured, public recreational programs of an active nature common to local parks in the City (such as ball games or court games) or unstructured public recreational activities, such as children's play areas, appreciation of open spaces, or a combination thereof, unconstrained by environmental restrictions that would prevent its use as a park and recreational facility, free of structures, roads, or utilities, and unencumbered by easements of any kind. The allowable amount of usable acres exceeding 2 percent grade at any given park site is determined on a case-by-case basis by the City.

Table 5.13-4 provides of the population-based park standards from the General Plan.

TABLE 5.13-4
POPULATION-BASED PARK STANDARDS

Park Type	Guidelines	Typical Components
Major Park	• 20 acres minimum; approximately 30 acres typical • Serves single or multiple community plan area(s) population(s) • Parking provided	• Specialized facilities that serve larger populations • Passive and active recreation facilities • Facilities found in Community Parks • Could include facilities found in Special Activity Parks • Community cultural facilities • Also called "Great Parks" or "Grand Parks"
Community Park	• 13-acre minimum (consistent with program and facilities on-site) • Serves population of 25,000 • Typically serves one community plan area but depending on location, may serve multiple community planning areas • Parking provided	• Passive and active recreation facilities • Facilities found in Neighborhood Parks • Could include facilities found in Special Activity Parks • Community cultural facilities • Recreation centers • Aquatic complexes • Multi-purpose sports fields
Neighborhood Park	• 3 acres – 13 acres • Serves population of 5,000 within approximately 1 mile • Accessible primarily by bicycling and walking • Minimal parking as necessary, only if 5 acres or more	• Picnic areas, children's play areas, multi-purpose courts, multi-purpose turf areas, comfort stations, walkways and landscaping • Also called "Greens" in urban settings
Mini Park	• 1 acre – 3 acres • Serves population within ½ mile • Accessible by bicycling and walking • No on-site parking, except for disabled access • May require funding source for extraordinary maintenance	• Picnic areas, children's play areas, small multi-purpose courts, multi-purpose turf areas, walkways and landscaping • Also called "Squares" in urban settings
Pocket Park or Plaza	• Less than 1 acre • Serves population within ¼ mile • Accessible by bicycling and walking • No on-site parking, except for disabled access • May require funding source for extraordinary maintenance	• Primarily hardscape • Picnic areas, children's play areas, walkways and landscaping • Multi-purpose courts • Multi-purpose turf areas

SOURCE: City of San Diego 2008.

Neighborhood Parks and Facilities

There are two existing neighborhood parks within the CPU area: Vista Pacifica and Ocean View Hills. Vista Pacifica is a 6-acre park located in the Robinhood Ridge Precise Plan area. Ocean View Hills is a 5.1-acre park located on Ocean View Hills Parkway. Both of these neighborhood parks provide a children's play area, picnic facilities, and passive lawn areas. The design of future neighborhood parks should be determined by the population and use characteristics of the neighborhood. Play areas, multi-purpose courts, picnic facilities, landscaping, and lawn areas are usual accommodations when

space permits and when appropriate for the specific neighborhood (City of San Diego 2011b).

The adopted PFFP and the CPU identify three neighborhood parks within the Northwest District of the CPU that are planned for construction: Dennery Ranch, Riviera del Sol, and Hidden Trails (City of San Diego 2011a). Dennery Ranch would be an 11.1-acre park east of I-805 and north of Ocean View Hills Parkway. Riviera del Sol would be a 4.9-acre park east of I-805 and north of SR-905. Hidden Trails would be a 3.7-acre park located in the Hidden Trails subdivision.

Community Parks and Recreation Centers

Community parks are intended to provide a wide range of facilities that supplement those of the neighborhood parks and are determined by the needs, preferences, and use characteristics of the community. Athletic fields, multipurpose courts, picnic facilities, play areas, recreation buildings, lawn areas, and landscaping are standard facilities when possible and desirable (City of San Diego 2011b).

Two community parks are being constructed within the CPU area: Beyer and Pacific Breezes. Pacific Breezes would be approximately 15 acres located adjacent to the 5-acre joint use area within the Ocean View Hills School north of SR-905. A 17,000-square-foot recreational building is planned for completion within the Pacific Breezes community park between 2013 and 2015. Beyer Community Park is located just west of Otay Mesa along Beyer Boulevard and the I-805 freeway. This 20.0-acre facility would be built as development occurs within Otay Mesa; however, it would only provide 7.5 usable acres of recreation and is not scheduled for completion until 2018. Although Beyer Community Park would be located in the adjacent San Ysidro community, it would jointly serve the needs of the communities of Otay Mesa and San Ysidro.

b. Resource-based Parks

Resource-based parks are located at the site of distinctive scenic or natural or cultural features and are intended for citywide use. They are meant to supplement the neighborhood and community parks, and they serve the entire City and its visitors rather than any one community. However, they can also function to fulfill local neighborhood and community park needs of surrounding residents (City of San Diego 2011b). The OVRP is an important resource-based park located adjacent to the northern boundary of the CPU area. Approximately 206 acres of OVRP are within the CPU area. OVRP provides recreational opportunities ranging from playing fields and picnic areas to hiking, biking, and horse trails. At the same time, the park protects open space, wildlife, historic, agricultural, and archaeological resources. There are plans for multi-use areas and an extensive trail system within the park's boundaries.

c. Open Space Lands

Approximately 2,748 acres (29 percent) of the CPU area is designated as open space; a majority (2,200 acres) of this acreage is within the MHPA. As of 2012, 1,837 acres have been conserved (see Figure 5.1-7). This important open space system is comprised of steep canyons and areas that contain sensitive biological resources. There are two open space areas within or adjacent to the plan area: Spring Canyon and Dennery Canyon. Spring Canyon, south of SR-905, is a series of long finger canyons that provide dramatic views and steep descents to the canyon floor. In addition, Dennery Canyon is an open space network within the OVRP system and wraps around the northwest neighborhoods of the plan area.

5.13.1.5 Libraries

The City operates a central library located in downtown San Diego and 35 branch libraries in neighborhoods throughout the City. A new central library, located in downtown San Diego, is 497,652 square feet within nine stories, and includes a charter high school on two floors, two levels of parking, and an auditorium. Total library attendance exceeded six million people in 2010, with branch libraries serving over 90 percent of those visitors (City of San Diego 2011c). Because the service area size of a branch library is a 2-mile radius, proximity to active commercial areas, town centers, and other municipal or civic uses, as well as access to public transportation and parking, are considered in the planning and siting of facilities.

There are currently no branch libraries within the CPU area. Primary library service is provided by the Otay Mesa-Nestor Branch Library, located at 3003 Coronado Avenue, west of I-805. This library reopened in April 2006 after being expanded to 15,000 square feet. Library service is also provided by the San Ysidro Branch Library, located at 101 W. San Ysidro Boulevard. The General Plan encourages branch libraries to be a minimum of 15,000 square feet of dedicated library space, with adjustments for community-specific need. According to the City's 2011 thresholds, "branch libraries should serve a resident population of 30,000 and may be established when a service area, which is expected to grow to 30,000 residents within 20 years of library construction, has a minimum population of 18,000 to 20,000" (City of San Diego 2011c).

5.13.1.6 Regulatory Framework

a. State Legislation

Senate Bill 50

Section 17620 of the California Education Code authorizes school districts to collect fees to mitigate the impact of new development on enrollment in the district. The State Allocation Board determines the maximum level of fees a district can levy for residential

and commercial/industrial development (City of San Diego 2008a). Government Code Section 65996 also recites that the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for the purposes of CEQA or for any other reason.

b. General Plan Policies

The Public Facilities, Services, and Safety Element of the General Plan includes policies on the prioritization and provision of public facilities and services, evaluation of new growth, guidelines for implementing a financing strategy, and guidelines for the provision of specific facilities.

The Recreation Element of the General Plan seeks to acquire, develop, operate/ maintain, increase, and enhance public recreation opportunities and facilities throughout the City. The element contains population-based guidelines for park and recreation facilities and presents alternative strategies to meet those guidelines.

Relevant policies from these elements are shown in Table 5.13-5.

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES

Policy	Description
Public Facilities, Services and Safety Element	
Fire-Rescue	
PF-D.1.	Locate, staff, and equip fire stations to meet established response times. Response time objectives are based on national standards. Add one minute for turnout time to all response time objectives on all incidents. • Total response time for deployment and arrival of the first-in engine company for fire suppression incidents should be within four minutes 90 percent of the time. • Total response time for deployment and arrival of the full first alarm assignment for fire suppression incidents should be within eight minutes 90 percent of the time. • Total response time for the deployment and arrival of first responder or higher-level capability at emergency medical incidents should be within four minutes 90 percent of the time. • Total response time for deployment and arrival of a unit with advanced life support (ALS) capability at emergency medical incidents, where this service is provided by the City, should be within eight minutes 90 percent of the time.
PF-D.2.	Deploy to advanced life support emergency responses EMS personnel including a minimum of two members trained at the emergency medical technician-paramedic level and two members trained at the emergency medical technician-basic level arriving on scene within the established response time as follows: • Total response time for deployment and arrival of EMS first responder with Automatic External Defibrillator (AED) should be within four minutes to 90 percent of the incidents; and • Total response time for deployment and arrival of EMS for providing advanced life support should be within eight minutes to 90 percent of the incidents.
PF-D.3.	Adopt, monitor, and maintain service delivery objectives based on time standards for all fire, rescue, emergency response, and lifeguard services.
PF-D.4.	Provide a 3/4-acre fire station site area and allow room for station expansion with additional considerations: • Consider the inclusion of fire station facilities in villages or development projects as an alternative method to the acreage guideline; • Acquire adjacent sites that would allow for station expansion as opportunities allow; and • Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate.

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES
(continued)

Policy	Description
PF-D.5.	Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services. a. Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or non-emergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities.
PF-D.6.	Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.
PF-D.7.	Evaluate fire-rescue infrastructure for adherence to public safety standards and sustainable development policies (see also Conservation Element, Section A).
PF-D.8.	Invest in technological advances that enhance the City's ability to deliver emergency and fire-rescue services more efficiently and cost-effectively.
PF-D.10.	Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.
Police	
PF-E.1.	Provide a sufficient level of police services to all areas of the City by enforcing the law, investigating crimes, and working with the community to prevent crime.
PF-E.2.	Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows: • Priority E Calls (imminent threat to life) within seven minutes. • Priority 1 Calls (serious crimes in progress) within 12 minutes. • Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes. • Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes. • Priority 4 Calls (minor requests for police service) within 90 minutes.
PF-E.3.	Buffer or incorporate design elements to minimize impacts from police stations to adjacent sensitive land uses, when feasible.
PF-E.4.	Plan for new facilities, including new police substations and other support facilities that will adequately support additional sworn and civilian staff.
PF-E.5.	Design and construct new police facilities consistent with sustainable development policies (see also Conservation Element, Section A).
PF-E.6.	Monitor how development affects average police response time goals and facilities needs (see also PF-C.5).

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES
(continued)

Policy	Description
PF-E.7.	Maintain service levels to meet demands of continued growth and development, tourism, and other events requiring police services. a. Analyze the need for additional resources and related capital improvements when total annual police force out-of-service time incrementally increases by 125,000 hours over the baseline of 740,000 in a given year. Out-of-service time is defined as the time it takes a police unit to resolve a call for service after it has been dispatched to an officer.
Libraries	
PF-J.1.	Develop and maintain a central library to adequately support the branch libraries and serve as a major resource library for the region and beyond.
PF-J.2.	Design all libraries with a minimum of 15,000 square feet of dedicated library space, with adjustments for community-specific needs. Library design should incorporate public input to address the needs of the intended service area.
PF-J.3.	Plan for larger library facilities that can serve multiple communities and accommodate sufficient space to serve the larger service area and maximize operational and capital efficiencies.
PF-J.4.	Build new library facilities to meet energy efficiency and environmental requirements consistent with sustainable development policies (see also Conservation Element).
PF-J.5.	Plan new library facilities to maximize accessibility to village centers, public transit, or schools.
PF-J.6.	Design libraries to provide consistent and equitable services as communities grow in order to maintain service levels which consider operational costs and are based on established guidelines.
PF-J.7.	Pursue joint use of libraries with other compatible community facilities and services including other City operations.
PF-J.8.	Build and maintain a library system that adapts to technological changes, enhances library services, expands access to digital information and the internet, and meets community and library system needs.
PF-J.9.	Adopt an equitable method for securing contributions from those agencies and organizations which benefit from the central library's services.
Schools	
PF-K.1.	Assist the school districts and other education authorities in resolving problems arising over the availability of schools and educational facilities in all areas of the City.
PF-K.2.	Design schools as community learning centers, recognize them as an integral part of our neighborhoods, and encourage equitable access to quality schools and other educational institutions.
PF-K.3.	Consider use of smaller school sites for schools that have smaller enrollments, and/or incorporate space-saving design features (multi-story buildings, underground parking, placement of playgrounds over parking areas or on roofs, etc.).

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES
(continued)

Policy	Description
PF-K.4.	Collaborate with school districts and other education authorities in the siting of schools and educational facilities to avoid areas with: fault zones; high-voltage power lines; major underground fuel lines; landslides and flooding susceptibility; high-risk aircraft accident susceptibility; excessive noise (see also Noise Element, Noise Compatibility Guidelines); industrial uses; hazardous material sites, and significant motorized emissions.
PF-K.5.	Work with school districts and other education authorities to better utilize land through development of multi-story school buildings and educational facilities.
PF-K.6.	Expand and continue joint use of schools with adult education, civic, recreational (see also Recreation Element, Section E) and community programs, and also for public facility opportunities.
PF-K.7.	Work with the school districts and other education authorities to develop school and educational facilities that are architecturally designed to reflect the neighborhood and community character, that are pedestrian-and cycling-friendly (see also Mobility Element, Policy ME-A.2), and that are consistent with sustainable development policies (see also Conservation Element, Section A) and urban design policies (see also Urban Design Element, Section A).
PF-K.8.	Work with school districts and other education authorities to avoid environmentally protected and sensitive lands in the siting of schools and educational facilities.
PF-K.9.	Work with school districts and other education authorities in evaluating best use of underutilized school district and other educational authority facilities and land for possible public acquisition and/or joint-use.
Recreation Element	
Park and Recreation/Park Planning	
RE-A.2.	Use community plan updates to further refine citywide park and recreation land use policies consistent with the Parks Master Plan. a. In the absence of a Parks Master Plan, utilize community plans to guide park and recreation facilities acquisition and development citywide. b. Coordinate public facilities financing plans with community plan and the Parks Master Plan recommendations to properly fund needed park and recreation facilities throughout the City. c. Identify the location of population-based parks when updating community plans so they are accessible and centrally located to most users, unless a community benefit can be derived by taking advantage of unique opportunities, such as adjacency to open space, park linkages, desirable views, etc.
RE-A.3.	Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space.
RE-A.4.	Consider existing, long-term recreation facilities provided by not-for-profit organizations when establishing priorities for new facilities.
RE-A.5.	Improve distribution of the most specialized recreation facilities, such as water play areas, swimming pools, off-leash dog areas, and skate parks.

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES
(continued)

Policy	Description
RE-A.6.	Pursue opportunities to develop population-based parks. a. Identify underutilized City lands with potential for use as mini-parks, pocket parks, plazas and community gardens. b. Encourage community participation in development and maintenance of City-owned mini-parks, pocket parks, plazas, and community gardens. c. Pursue acquisition of lands, as they become available, that may be developed as mini-parks, pocket parks or plazas.
RE-A.7.	Establish a policy for park design and development which encourages the use of sustainable methods and techniques to address water and energy conservation, green buildings, low maintenance plantings and local environmental conditions, such as soil and climate (see also Conservation Element, Section A).
Park and Recreation/Park Standards	
RE-A.8.	Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents (see also Parks Guidelines). a. All park types within the Population-based Park Category could satisfy population-based park requirements (see also Table RE-2, Parks Guidelines). b. The allowable amount of useable acres exceeding two percent grade at any given park site would be determined on a case-by-case basis by the City. c. Include military family housing populations when calculating population-based park requirements.
RE-A.10.	Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini-parks to supplement population-based parks. (see also Urban Design Policies, UD-B.8 and UD-C.5): a. Consider partial credit for the provision of private recreation facilities when it is clearly identified that the facilities and programs provide a public benefit and are intended to help implement the population-based park guidelines and are bound by easements and agreements that remain in effect in perpetuity according to adopted policies (see also RE-A.1.g).
Park and Recreation/Equity	
RE-A.11.	Develop a diverse range of recreation programs that are sensitive to and consider community needs, interests, and financial resources.
RE-A.12.	Ensure that appropriate quality and quantity of parks, recreation facilities and infrastructure is provided citywide.
RE-A.13.	Designate as a priority, in economically disadvantaged and underserved neighborhoods, the identification of funding sources for acquisition and development of park and recreation facilities.
RE-A.14.	Designate as a priority, in economically disadvantaged and underserved neighborhoods, the development of population-based parks and recreation facilities for local youth activities.

TABLE 5.13-5
GENERAL PLAN POLICIES RELATED TO PUBLIC SERVICES
(continued)

Policy	Description
Park and Recreation/Implementation	
RE-A.15.	Ensure that adequate funding is identified in public facilities financing plans for the acquisition and development of sufficient land necessary to achieve a minimum ratio of 2.8 useable acres per 1,000 residents or appropriate equivalencies, including any unmet existing/future needs.
RE-A.16.	Adopt an ordinance which authorizes implementation of the state Subdivision Map Act/Quimby Act and provides a methodology for collecting land and/or appropriate park fees from new subdivisions for population-based parks and recreation facilities to serve future residents.
RE-A.17.	Ensure that all development impact fees and assessments collected for the acquisition and development of population-based parks and recreation facilities be used for appropriate purposes in a timely manner.
RE-A.18.	Pursue joint use agreements for recreational facilities on other public agency-owned land to help implement the population-based park acreage requirements if they meet the criteria for equivalencies (see also Eligible Population-Based Park Equivalencies).

SOURCE: City of San Diego General Plan Public Facilities, Services, and Safety Element and Recreation Element 2008.

5.13.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, a significant public services impact would occur if the CPU would:

1. Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

5.13.3 Issue 1: Public Facilities

In order to maintain acceptable service ratios, response times, or other performance objectives, would the CPU promote growth patterns resulting in the need for the provisions of new or altered public facilities, the construction of which could cause significant physical impacts?

5.13.3.1 Impacts

Implementation of the CPU would increase the demand for public services and facilities within the CPU area. Construction of new facilities has the potential to result in significant physical impacts. The General Plan and the CPU both include policies that would reduce construction impacts by requiring projects to minimize landform alteration and utilize sustainable building practices to help ensure that the actual construction of

public facilities would be as environmentally sensitive as possible. In addition, both plans incorporate the City of Villages strategy, which was designed to create a development pattern that could be efficiently served by public facilities and utilities. Compact, mixed-use development, as proposed by the CPU within village centers, would create an efficient land use pattern by concentrating growth into targeted areas.

Public facilities and services such as emergency services, schools, libraries, and parks are often supported through financing mechanisms such as development impacts fees, the establishment of FBAs, and a PFFP. The PFFP for Otay Mesa would serve to implement the CPU by identifying the specific public facilities needed to comply with General Plan and Otay Mesa Community Plan standards. The PFFP would include a description of public facilities with funding sources, and a schedule of proposed FBAs. The dollar amount of the assessment would be based upon the cost of each public facility equitably distributed over a designated area of benefit in the CPU area. Fees would be paid on the actual development when construction permits are issued.

a. Fire Protection

The projected population for the CPU at buildout is 67,035 residents. Implementation of the CPU would result in increased population within the project area, thus increasing demand for fire protection services. Based on this projected population, in order to maintain the current standards, a total of 67 firefighters would be needed upon buildout of the CPU. In addition, this increased population would increase the call volume for the engine companies assigned to the CPU area and would contribute to the need for new or altered facilities.

In addition to the aforementioned General Plan policies regarding fire protection, the CPU includes Public Facilities, Services and Safety Element Policies 6.1-1 through 6.1-3, which address the provision of fire protection services. Specifically, Policy 6.1-1 aims to maintain fire protection service levels to meet the demands of continued growth and development in the community by monitoring the effect of development on response times and facility needs. In accordance with General Plan Policy PF-D.4, Policy 6.1-2 calls for the construction of a minimum of 10,500-square-foot fire station (future Fire Station No. 49) and an additional 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 (see Figure 5.13-1).

The construction of Fire Station No. 49 and the 10,500-square-foot collocated facility are specifically contemplated by the PFFP for the CPU. The construction of these facilities would be within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at the program-level of analysis, impacts related to the construction of new fire-rescue facilities would be less than significant.

b. Police Protection

The CPU would result in increased population within the CPU area, thus increasing demand for police protection services. As shown in Table 5.13-2, above, the average response times for Beat 713 exceed both the citywide average and police department goals for all calls, except Priority Four. Police response times in the CPU area would continue to increase with the buildout of the CPU and the increase of traffic generated by new growth. The SDPD strives to maintain the response time goals as one of various other measures used to assess the level of service to the community.

The city-wide staffing ratio for police officers to population is 1.45 officers per 1,000 residents based on 2010 estimate residential population of 1,376,173 and a police force of 1,969.5 officers (FY 2012). The ratio is calculated using the department's total staffing to take into account the support and investigative positions within the department. As previously discussed under existing conditions, the SDPD does not staff individual stations based on ratios of sworn officers per 1,000-population ratio.

In addition to the aforementioned General Plan policies regarding police protection, the CPU includes Public Facilities, Services and Safety Element Policy 6.1-1, which aims to maintain police service levels to meet the demands of continued growth and development in the community by monitoring the effect of development on response times and facility needs. As discussed above under Fire Protection, this policy also calls for the identification and construction of a collocated fire and police protection facility. Crime Prevention through Environmental Design (CPTED) is also advocated by the police department to address general security concerns within the community (SDPD, pers. comm. with Captain Manny Guaderrama, 2010). CPTED is based on the idea that the proper design and effective use of the built environment can lead to a reduction in the incidence of crime.

A 10,000-square-foot collocated police/fire-rescue facility is contemplated by the PFFP for the CPU. The construction of this facility would be within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at the program-level of analysis, impacts related to the construction of a new collocated police/fire-rescue facility would be less than significant.

c. Schools

Buildout of the CPU has the potential to result in a substantial increase in the student population in the community. This EIR addresses the student generation that would occur as a result of the implementation of the CPU, identifies the need for new schools, and the associated physical impacts of their construction.

Table 5.13-6 shows the student generation rates for single- and multi-family residential development for grades K-12 and associated number of students generated at buildout of the CPU.

TABLE 5.13-6
SINGLE-FAMILY AND MULTI-FAMILY STUDENT GENERATION RATES FOR SAN YSIDRO AND SWEETWATER HIGH SCHOOL DISTRICTS AND PROJECTED STUDENT POPULATION AT BUILDOUT OF THE CPU

School Level	Student Generation Rate		Number of Units		Number of Students
	SF	MF	SF	MF	Total
K-8 (San Ysidro)	0.4628	0.5424	3,076	13,437	9,312
K-6 (750 Capacity) and K-8 (1200 Capacity) "Paired"	0.4628	0.5424			9,312
9-12 Sweetwater	0.1939	0.1171	4,273	14,501	2,527
TOTAL					21,151

SOURCE: City of San Diego (previous facilities consultant, PDC, est. 2006)
SF = single-family; MF = multi-family

The total number of students in Table 5.13-6 is based on the 18,774 dwelling units proposed under the CPU, which includes 4,273 single-family and 14,501 multi-family units.

Chula Vista Elementary School District

Student generation rates for the CVESD are not included within Table 5.13-6. The CVESD indicated in a response to a request for information that the portion of the CPU area that lies within the CVESD's boundary would not result in generation of additional students. Thus, there would be no need for additional schools or associated physical impacts.

San Ysidro School District

As shown in Table 5.13-6, buildout of the CPU would result in an increase in student population within the SYSD. The CPU indicates that it is the intent of the City to collaborate with SYSD on the locations for two to three additional K-8 schools and one to three additional K-6 schools within the Southwest and Central Village areas to meet increased demand associated with the proposed project (Policy 2.6-2.c, City of San Diego 2011a). While siting has not yet been determined, these schools would be clustered in areas of residential development to serve the increased population.

Sweetwater Union High School District

Buildout of the CPU would result in an increase in student population within the SUHSD that would exceed existing capacity (SUHSD, pers. com. with Paul Woods, 2010). While Montgomery High School has capacity for additional students, the California Department

of Education (CDE) recommends no more than 1,400 students on that campus because of site size (SUHSD, pers. com. with Paul Woods, 2010). As such, current enrollment exceeds this recommendation by approximately 204 students. In addition, based on current capacity, San Ysidro High School has room for approximately 276 additional students in temporary portables. However, based on the CDE recommended maximum capacity of 1,800 students for San Ysidro High School, current enrollment exceeds this recommendation by approximately 614 students (SUHSD, pers. com. with Paul Woods, 2010). The CPU indicates that it is the intent of the City to collaborate with SUHSD on the location of one additional high school to meet increased demand (Policy 2.6-2.d, City of San Diego 2011a). ~~While siting has not yet been determined, the CPU indicates that this facility would be located within the central portion of the planning area, south of Airway Road (see Figure 5.13-1).~~

Policies in the General Plan promote cooperation with educational agencies and school districts in the siting of future schools. As an example, the proximity of the school site to fault zones and noise generators as well as avoidance of hazardous areas and sensitive lands (biological and historical resources) are considered in the siting of new facilities. In addition, school sites would be designed to be compatible with the neighborhood or provide joint use facilities.

It is a goal of the CPU to provide educational opportunities within the community. In support of this goal, the CPU includes Public Facilities, Services and Safety Element Policy 6.6-3 which encourages coordination with SYSD and SUHSD to ensure that adequate public facilities and infrastructure are in place, and compliance with maximum school enrollments are achieved consistent with demand.

The individual school districts are responsible for planning, siting, building, and operating schools in their responsible districts within the CPU area. When additional demand warrants, the provision of school facilities is the responsibility of the San Ysidro School District and Sweetwater Union High School District. Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development as a method of addressing increased enrollment resulting from that development. State SB 50 significantly revised developed fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that the statutory fees are the exclusive means of considering and mitigating school impacts. SB 50 limits the mitigation that may be required to the scope of the review of any future project's impacts to schools, and the findings for school impacts. Payment of the statutory fees by future projects consistent with the CPU would constitute full and complete mitigation. Thus, the payment of statutory fees to the affected school district and adherence to the policies contained in the CPU would reduce impacts related to the provision of new educational facilities to less than significant. In addition, any new schools that would be built within the CPU would be subject to environmental review by the individual school districts in accordance with the provisions

of CEQA. Therefore, impacts associated with the construction of future school facilities would be less than significant.

d. Parks and Recreation

As discussed under existing conditions, there are currently 2,624 acres combined of parkland and open space (54 and 2,570 acres, respectively) within the CPU area. The demand for park and recreation opportunities will continue to grow as the population within the CPU area increases. Population-based park requirements for the community are calculated based on community plan densities and General Plan standards. The General Plan park standard is to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents (see the General Plan, Table RE-2, "Park Guidelines"). The General Plan also establishes population-based minimum guidelines for recreation centers (1 per 25,000 residents) and aquatic complexes (1 per 50,000 residents). In addition, the General Plan allows for the use of park equivalencies to help meet population-based requirements by providing upgrades, amenities, and recreation facilities where development of usable areas for active recreational purposes is limited. The projected population for the CPU at buildout is 67,035 residents.

According to General Plan Guidelines, Table 5.13-7 illustrates the parks and recreation needs of the project area at buildout of the CPU.

TABLE 5.13-7
CPU PARK ACREAGE NEEDS AT BUILDOUT

Planning District	Total Units	Total Population	Park Acres*
Northwest Area	7,648	27,908	51**
Southwest Village	5,880	21,028	59
Central Village	5,246	18,099	51
TOTAL	18,774	67,035	161

SOURCE: City of San Diego 2011a.
*Based on the City's General Plan Guidelines of 2.8 acres of population based parks per 1,000 residents.
**Park standards governed by previously adopted Precise Plans.

It is the intent of the CPU to provide park and recreation services within the community. Under the CPU, approximately 2,748 acres are designated for parks and open space. Of this, 161 acres are designated for population-based parks consistent with the General Plan guideline; the remaining 2,587 acres would consist of open space. As stated in the General Plan, community parks may be provided in the form of major parks or community parks; and neighborhood parks may be provided in the form of neighborhood parks, mini parks, pocket parks or plazas. As shown on Figure 5.13-1, multiple neighborhood parks and a joint-use area are planned within the CPU area, with Pacific Breezes Community Park, Beyer Community Park, and Grand Park sited to equitably serve the community, as described below (City of San Diego 2011a).

As of 2011, there is approximately 51 acres of parkland within the Northwest District, or 1.8 acres per 1,000 residents, as stipulated in the previously approved precise plans that govern development in these areas. In addition, the 5-acre Ocean View Hills joint use area contributes to the population-based park requirements in this area.

The remaining 110 acres, or 2.8 acres per 1,000 residents, would be provided in the Southwest and Central Village areas. Of these 110 acres, a minimum of approximately 21 acres (13 acres per 25,000 residents) of community parks would be provided; the remaining acreage would be in the form of neighborhood parks. Some neighborhood park acreage has been allocated to Grand Park (described below).

Within the Southwest District, including the Southwest Village, approximately 53.5 acres of population-based parkland would be provided, including one shared community park and multiple neighborhood parks. In addition, this District would benefit from Beyer Community Park located in, and shared with, the San Ysidro community planning area. While specific siting has not yet been determined, it is anticipated that several of the parks would be located adjacent to Spring Canyon to enhance public views and provide staging areas for canyon trails. In addition, a portion of the required parkland would be allocated to the Grand Park located in the Central Corridor District (City of San Diego 2011a).

The Central District, including the Central Village, contains Grand Park and would be adjacent to open space and developed parks. As identified in the CPU, the Central Village would contain multiple neighborhood parks, some adjacent to schools. In addition, a portion of Beyer's Community Park acreage and some of the required neighborhood park acreage would be allocated to Grand Park (City of San Diego 2011a).

Grand Park, an approximately 36-acre community park, is planned in the center of the community along Airway Road. It is envisioned as a link between villages and surrounding employment centers and educational institutions to enhance the connectivity of the Airway Road transit corridor. Grand Park would provide a major community recreation destination for residents and workers and would include baseball, softball, and soccer areas, a recreation center, and an aquatics center as well as a venue for sports tournaments, running/walking races, youth events, and cultural festivals. The consolidation of required park acreage from the Southwest District and Central District into Grand Park would provide a central venue that would be served by transit and appropriately designed to address potential traffic, noise and lighting impacts associated with large-scale facilities.

In addition to the General Plan "Park Planning Policies" previously discussed, the CPU includes several policies related to the provision of parkland open space. These numerous goals and policies were designed to help ensure that the City maintains existing parks and park facilities as well as to provide additional parkland to serve the

growing population. Specifically, implementation of Policy 2.5-4 aims to "identify and provide population-based parks per the General Plan standards at locations that are accessible and centrally located to most users within the Southwest and Central Villages." In addition, Recreation Element Policies 7.1-1 through 7.1-15 address the provision of parkland within the community. Specifically, implementation of these policies would ensure that park needs are assessed as the community continues to grow and ensure that parks are sited equitably and provide usable acreage of parkland required to meet General Plan population-based park standards. Recreation Element Policies 7.2-1 through 7.2-6 address open space lands and resource-based parks. These policies focus on balancing the goals to preserve MHPA and open space areas with efforts to provide recreation (i.e., biking and hiking trails), while minimizing the alterations of the natural environment.

In conclusion, the CPU would result in the need for and/or provision of new or physically altered public facilities, the construction of which could result in potentially significant environmental impacts. In order to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents, new parks, or equivalencies, would be required in the CPU area through buildout. The construction of new neighborhood and community park facilities (including Grand Park, Pacific Breezes, and Beyer Community Park) is specifically contemplated by the current PFFP for the CPU, and it is reasonable to assume that these facilities would be constructed in the future. The funding of recreational facilities is an implementation policy in the General Plan. If new parkland or recreational facilities are required as part of a development project, potential environmental effects would be analyzed on a case-by-case basis to ensure that population-based parks are provided for, either through development of park and recreation facilities or payment of the DIF. If new parkland or recreational facilities are proposed as part of a development project, potential environmental effects would be analyzed at that time. Based on these considerations, at the program level of analysis, impacts related to the construction of new parkland or recreational facilities would be less than significant.

e. Libraries

As discussed above, the existing Otay Mesa-Nestor Library serves the needs for both the Otay Mesa-Nestor and the Otay Mesa communities. In addition, the San Ysidro Library, located outside the planning area, is also available for the residents of the Otay Mesa community. The CPU states that as the Otay Mesa community further develops, a library facility would be provided within the community (City of San Diego 2011a). Specifically, implementation of Public Facilities, Services and Safety Element Policy 6.6-4 would "provide a library within the community planning area that meets community needs, and that would adapt to technological changes, enhance library services, and expand access to digital information and the internet."

The specific location of a library within the CPU area has not yet been determined, but the funding of this new facility is an implementation policy in the General Plan. Construction of the new library would be subject to separate environmental review at the time that design plans are available. Therefore, based on these considerations, at the program-level of analysis, impacts related to the construction of new library facilities would be less than significant.

5.13.3.2 Significance of Impacts

Buildout of the proposed CPU would increase demand for all public services—including fire and police protection, schools, parks and recreation, and libraries—which would in turn result in the need for new public facilities. The construction and operation of these facilities would occur within the footprint of the CPU area (although a future library site has not yet been identified). These facilities would be subject to numerous development regulations within the City, including policies within the General Plan and CPU and subject to environmental review as design plans are available. The individual school districts are responsible for planning, siting, building, and operating schools in their responsible districts within the CPU area.

a. Fire Protection Services

Buildout of the proposed CPU would increase demand for fire protection services and would contribute to the need for new or altered facilities. The planned construction of Fire Station No. 49, in addition to the collocated facility, is specifically indicated in the proposed CPU, and 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 proposed CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, impacts related to the construction of fire protection facilities would be less than significant.

b. Police Protection Services

Buildout of the proposed CPU would result in additional demand for police service in Beat 713. Currently, 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 community plans and the increase of traffic generated by new growth. A 10,500-square-foot collocated police/fire-rescue facility is contemplated by the PFFP for the proposed CPU. It is reasonable to assume that this facility would be constructed in the future in order to meet acceptable service levels. The construction of this facility would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, impacts related to the construction of new fire facilities would be less than significant.

c. Schools

As stated above, buildout of the proposed CPU would place additional demands on school services and additional facilities would be required to meet the needs of the CPU buildout. The construction of these facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. SB 50 limits the mitigation that would be required to the scope of the review of any future project's impacts to schools, and the findings for school impacts. Payment of the statutory fee by future projects consistent with CPU would mitigate the impact because of the provision that the statutory fees constitute full and complete mitigation.

d. Parks and Recreation

New parks would be required in the CPU area, in order to meet the increased demand associated with buildout of the proposed CPU. Under the CPU, approximately 2,909 acres would be designated for parks and open space. Of this, 161 acres are designated for population-based parks consistent with the General Plan guideline; this figure combines the existing 51 acres in the northwest district, which was calculated based on previously adopted Precise Plans, with 110 acres (2.8 per 1,000) for the other districts within the CPU. The CPU also stipulates that of the 110 acres, 21 acres would be in the form of a community park and the remainder as neighborhood parks.

The remaining 2,748 acres would consist of open space. The construction of additional park facilities is specifically indicated in the PFFP for the CPU; and it is reasonable to assume that these facilities would be constructed in the future. The construction of these facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, impacts related to the construction of new park and recreation facilities within the CPU area would be less than significant.

e. Libraries

The CPU has identified the need for an additional library facility to serve the project area upon buildout of the proposed project CPU. Although the specific location of a library has not yet been determined, the construction of a new facility is specifically contemplated by the current PFFP for the CPU, and it is reasonable to assume that this facility would be constructed in the future. The construction of this facility would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, impacts related to the construction of a new library within the CPU area would be less than significant.

5.13.3.3 Mitigation Framework

Impacts associated with fire, police services, schools, parkland, and libraries would be less than significant; therefore, no mitigation is required.

5.13.3.4 Significance after Mitigation

Impacts associated with fire, police services, schools, parkland, and libraries would be less than significant.

5.14 Utilities

Utility services addressed in this PEIR include water, wastewater, reclaimed water, solid waste, storm water drainage, and communication systems. Utility providers include a variety of City, special district, quasi-public agencies, and private companies. The following discussion is focused on environmental impacts resulting from the need for new or alteration to existing utilities due to project implementation.

Water, sewer, and reclaimed water discussions herein are based on the Technical Infrastructure Study (2011) prepared by Atkins and included as Appendix L to this PEIR. The purpose of the Technical Infrastructure Study is to provide a summary of wet utility requirements (water, sewer, recycled water) for the CPU, as compared to the buildout of existing land use plans (Otay Mesa Community Plan 1981) to determine what additional infrastructure would be required to support the proposed changes in land use. Water supply to the CPU area is addressed separately within Section 5.15. A separate discussion of energy services and conservation is provided in Section 5.9, Energy Conservation.

5.14.1 Existing Conditions

5.14.1.1 Water Systems

There are two water service providers in the CPU area: City of San Diego PUD and the Otay Water District (OWD). In general, the City provides water service to the western portion of the CPU area and OWD to the eastern portion, generally east of Heritage Road. Both agencies are members of the SDCWA, which imports both potable and raw (untreated) water to the San Diego region via the Second San Diego County Aqueduct.

a. City of San Diego PUD

The City purchased the water supply system in 1901, and through continual expansion, provides water service to more than 1.3 million residents over 404 square miles of developed land in the south central portion of San Diego County. The City's PUD purchases up to 90 percent of its water from the SDCWA, which in turn purchases most of its water from the Metropolitan Water District (MWD). Water supply is discussed in detail in Section 5.15 of this PEIR.

The City's water system consists primarily of nine raw water storage facilities with over 408,000 acre-feet (AF) of storage capacity, 3 water treatment plants, 31 treated water storage facilities, and more than 3,213 miles of transmission and distribution lines. The local surface raw water storage facilities are connected directly or indirectly to the City's water treatment operations, Otay Water Treatment Plant, Alvarado Water Treatment

Plant, and Miramar Water Treatment Plant. These three plants have a total capacity of 294.4 mgd.

From SDCWA, water is delivered to the City's Lower Otay Reservoir via Pipeline 3 and is treated by the 40 mgd Otay Water Treatment Plant. From the treatment plant, water is conveyed via two pipelines to the South San Diego Reservoir. The 15-million-gallon South San Diego Reservoir feeds three pipelines, including the South San Diego Pipelines 1 and 2 that provide water to the South San Diego and Otay Mesa areas. The South San Diego Pipelines connect to the Otay Mesa Pump Station (10.8 mgd) located off Otay Valley Road. This pump station provides service to Otay Mesa 680 Pressure Zone (Brown Field) and connects to the Ocean View Hills and Princess Park pump stations.

The Ocean View Hills and Princess Park pump stations were designed based on the South San Diego-Otay Mesa Water Study (1999). This study estimated the future water demand of 12.68 mgd based on projected land uses. Per the study, the Ocean View Hills pump station was designed to provide 2.8 mgd for the Ocean View Hills community. The Princess Park pump station was designed to provide 0.5 mgd.

b. Otay Water District

The OWD receives water from Pipeline 4 at Flow Control Facility 13. Water from this facility is stored in Reservoir 571-1 that has a capacity of 36.7 million gallons. The 870-1 roll pump station (19.2 mgd capacity) pumps water through two 30-inch mains to Reservoir 870-1. From this 11-million-gallon reservoir, water is transported through a 30-inch main in Alta Road to the Otay Mesa pipeline network ranging from 8 to 30 inches. The eastern portion of the CPU area is serviced by the 870 Pressure Zone.

5.14.1.2 Wastewater

The City PUD is responsible for wastewater service within the CPU area. Wastewater service to the CPU area is currently provided through the Otay Mesa sewer collection system via the Otay Mesa Trunk Sewer (OMTS), the Otay Valley Trunk Sewer (OVTS) system, and Metropolitan Sewerage System (Metro). The Metro facilities include the San Ysidro Interceptor, the South Metro Interceptor, and the City's wastewater treatment facilities. The OMTS has been planned for expansion to accommodate growth in the CPU area.

a. Otay Mesa Sewer Collection System

The wastewater from the eastern portion of the Otay Mesa Drainage Basin is currently collected via sewer pipelines ranging from 6 to 33 inches and conveyed to a 30-inch main in Siempre Viva Road. This flow, which averaged 1.2 mgd wet weather flows in 2009, is directed to pump station 23T. Pump station 23T has a capacity of 9 mgd and

pumps water through pipes in Cactus and Heritage roads to the 30-inch OVTS. The 7.3-mile-long OVTS conveys flows from Heritage Road, along Otay Valley Road, to I-805, along local roads to the South Metro Receptor. The OVTS bottleneck in Heritage Road has a capacity of 4.3 mgd and is nearing capacity.

Otay Mesa Trunk Sewer

In 2004, the OMTS Master Plan and Alignment Study was adopted by the City Council. Subsequently, the OMTS Refinement and Phasing Report prepared in 2009 recommended several sewer system upgrades in the Otay Mesa sewer basin to resolve capacity constraints in the near-term due to contracted capacity and to meet flows through year 2030. Per this report, the identified sewer improvements would enhance pumping and conveyance capabilities from the City's Otay Mesa sewer pump station 23T to the existing San Ysidro Trunk Sewer. Completion of the proposed upgrades would substantially complete the OMTS system and relieve the capacity issues in the Otay Valley.

The OMTS has been partially constructed to relieve the OVTS capacity. Currently the OMTS includes the 27- and 30-inch gravity sewer in Siempre Viva Road that is pumped to the OVTS on an interim basis via pump station 23T. In addition, a 42-inch gravity sewer in Old Otay Mesa Road connects to a 10-inch main in Old Otay Mesa Road on an interim basis. SR-905 includes pipeline sleeves at Cactus Road to allow for future upgrades of this system.

b. Otay Valley Trunk Sewer System

The existing 27-inch OVTS conveys wastewater from the Otay Valley drainage basin from as far east as the Donovan Correctional Facility, west to the City's Metro System. This trunk sewer also temporarily conveys the wastewater generated in east Otay Mesa via sewer pump stations 23T and 48T. The eastern portions of the OVTS were constructed and funded under reimbursement agreements with the City, and are operated and maintained by the City's PUD. The 7.3-mile-long gravity main extends from Heritage Road, east along Otay Valley Road to I-805 and within existing roads north of the Otay River between I-805 and the South Metro Interceptor.

c. Metro Facilities

The Metro system includes the San Ysidro Interceptor, South Metro Interceptor, and City's wastewater treatment facility. The OMTS in Old Otay Mesa Road within the western portion of the CPU discharge into the 30- to 42-inch San Ysidro Interceptor. The Grove Avenue pump station is located along this interceptor and redirects "skimmed flow" to the South Bay Water Reclamation Plant (SBWRP) via a 30-inch force main. The SBWRP can treat 15 mgd to a tertiary level for reuse, but treats 8 mgd on average. Excess water is released via the South Bay Land and Ocean Outfall.

The South Metro Interceptor collects wastewater from the OVTS and San Ysidro Interceptor in addition to several City of Chula Vista trunk sewers. The South Metro Interceptor conveys these flows to the Point Loma Water Treatment Plant via the Metro pump station 2. The Point Loma Water Treatment Plant treats water to a primary level and discharges via a deep ocean outfall. This treatment plant has a capacity of 190 mgd and is currently being expanded to 240 mgd.

5.14.1.3 Reclaimed Water

OWD serves some customers with recycled water from the Ralph W. Chapman Water Reclamation Facility and from the City's South Bay Water Recycling Plant. There are, however, no recycled water distribution lines currently extending to the CPU area.

5.14.1.4 Solid Waste

The City provides refuse, recycling, and yard waste collection and disposal services to some residents under the People's Ordinance (Municipal Code Section 66.0127), which was adopted in 1919 by the residents of San Diego. The City provides solid waste collection services to primarily single-family homes, and some multi-family; this service is paid for by the General Fund. Most multi-family residences are not served and are required to fund and contract directly with private haulers for trash and recycling collection.

Solid waste generated in the City is primarily taken to three landfills; either the City's Miramar Landfill, located north of SR-52; the Sycamore Sanitary Landfill, located within the City of San Diego east of I-15 and operated by Republic Services; or the Otay Landfill, located within Chula Vista, north of I-905 and also operated by Republic Services. Based on current and projected disposal rates, and permitted disposal limits, the San Diego region is anticipated to exceed the ability of existing landfills to accept waste within the next 10 years unless landfill expansions are approved.

The Miramar Landfill is permitted to receive 8,000 tons per day, and on average, it receives less than 1,000,000 tons per year. The anticipated closure date for the landfill is 2022.

The Sycamore Landfill is permitted to receive a maximum of 3,965 tons per day, although the permit and the facility franchise are inconsistent. The owner/operator is currently proposing a significant increase in throughput, together with a major expansion of the height and footprint of the facility. The Sycamore Landfill, based on a 3,965-ton-per-day limit, is expected to operate until 2031. The Sycamore Landfill Master Plan proposes to increase the landfill capacity to 157 million cubic yards, which would allow an increase from 3,965 tons per day to approximately 11,450 tons per day. With the proposed expansion, the landfill would be operational until approximately 2050. This

increase in landfill capacity is not currently approved or permitted, and therefore cannot be guaranteed to be completed at this time.

The Otay Landfill is permitted to receive 5,830 tons per day. Permits were recently modified, which reduced the overall height of the landfill with no loss of capacity. The Otay Landfill is expected to serve the region through 2021 (California Department of Resources Recycling and Recovery [CalRecycle] 2012). Currently, most single-family residential waste generated in the southern portion of the City, which includes the CPU area, is disposed at Otay Landfill. Waste collected from multi-family residential and commercial areas is disposed at area landfills as determined by the agreements of franchise haulers.

5.14.1.5 Storm Water Infrastructure

The City maintains drainage and conveyance systems to protect the beneficial uses of the San Diego Basin. In addition to flood control channels and detention basins, storm drain pipelines are in place for the conveyance of urban runoff and storm water.

Existing drainage and storm water conveyance facilities have been constructed throughout Otay Mesa in compliance with regulations according to the needs of private development projects. Existing storm drain facilities have been constructed for industrial uses distributed throughout the central and eastern portions of the CPU area. Although not included in the hydrology study performed for the CPU, storm drains are also present in existing residential neighborhoods in the northwest portion of the CPU area. Other existing storm drain facilities, such as those for San Ysidro High School in the western part of the CPU area, occur as needed throughout the CPU area in the immediate vicinity of development, to connect to existing channels.

5.14.1.6 Communications

Communications systems for telephone, computers, and cable television are serviced by utility providers such as AT&T, IBM, Cox, and other independent cable companies. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects.

5.14.2 Existing Regulatory Framework

The City's General Plan, Public Facilities, Services and Safety Element, presents goals and policies for water infrastructure, to assure the provision of safe, efficient, and sustainable distribution of water. Relevant policies are stated in Table 5.14-1, below.

TABLE 5.14-1
PUBLIC FACILITIES ELEMENT POLICIES RELATED TO UTILITIES

Policy	Description
PF-H.2	Require the provision and maintenance of essential water storage, treatment, supply facilities and infrastructure to serve existing and future development.
PF-H.3	Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development.
PF-F.5	Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies.
PF-F.6	Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.
PF-H.1.e	Continue to develop the recycled water customer base, and expand the distribution system to meet current and future demands.
PF-I.2	Maximize waste reduction and diversion
PF-I.3	Provide environmentally sound waste disposal facilities and alternatives.
PF-I.3.f	Cooperate on a regional basis with local governments, state agencies, and private solid waste companies to find the best practicable, environmentally safe, and equitable solutions to solid and hazardous waste management.
PF I.5	Plan for sufficient waste handling and disposal capacity to meet existing and future needs. Evaluate existing waste disposal facilities for potential expansion of sites for new disposal facilities.
PF-G.1	Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards.
PF-G.4	Develop and employ a strategic plan for the City's watersheds to foster a comprehensive approach to storm water infrastructure improvements.

SOURCE: City of San Diego General Plan 2008.

5.14.2.1 Water

a. Otay Water District 2010 Water Resources Master Plan

The OWD Water Resources Master Plan (WRMP) outlines a comprehensive program for the orderly and phased development of potable and recycled water supply, storage, transmission, and distribution through ultimate buildout of the land within the OWD, according to local land use approvals and planning. The projects in the WRMP consist mostly of pipelines, reservoirs, and pump stations that are needed based on population projections, OWD criteria for the adequacy of facilities, and specific project development

plans in the OWD's service area. The OWD water model was updated in November 2010 as part of the 2010 WRMP Update to include increased potable water demands from the CPU. The WRMP Update determined that the increased potable water demands associated with the CPU would not warrant transmission main upgrades above those previously identified for the forecasted growth in the area.

The 2010 WRMP Update was also revised to include increased recycled water supply, storage and pumping conditions. No additional improvements, beyond those recommended in the 2008 WRMP, were identified.

b. City of San Diego

The City developed a Long-Range Water Resources Plan (2002–2030) in 2002 in order to address the projected need for additional water supplies. This plan detailed existing water supplies, new water supply opportunities, objectives and performance measures, and ultimately conclusions and recommendations. Currently, the City is in the process of finalizing the 2012 Long-Range Water Resources Plan that reviewed and re-assessed the planning objectives and stakeholder values, discussed and evaluated emerging issues using the most recent information available to update the long-term water resources strategy for the City.

In July 2011, the City adopted the 2010 Urban Water Management Plan (UWMP) which addresses the City's water system, water supply sources, historic and projected water use, and provides a comparison of water supply to water demands during average, single-dry, and multiple-dry year periods. The UWMP was prepared in accordance with the Urban Water Management Act (as amended, California Water Code, Sections 10610 through 10656), which requires every urban water supplier that provides water for municipal purposes to more than 3,000 connections or supplying more than 3,000 acre-feet of water annually, to adopt and submit a plan every five years to the California Department of Water Resources.

5.14.2.2 Solid Waste/Recycling

a. Collection Services

The City provides refuse, recycling, and yard waste collection and disposal services to some residents under the People's Ordinance (Municipal Code Section 66.0127). The City provides solid waste collection services to primarily single-family homes, and some multi-family units; this service is paid for by the General Fund.

b. Diversion and Recycling

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (AB 939), which

mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. In response, the City Environmental Services Department (ESD) developed the Source Reduction and Recycling program that outlined waste management policies and programs to meet the City's long-term disposal needs and achieve the mandated waste reduction. Since 2004, the City has diverted more than 50 percent of its generated waste stream from disposal.

The State then enacted AB 341 in 2011, which established a policy goal for California that not less than 75 percent of solid waste that is generated be source-reduced, recycled, or composted by 2020. A report was prepared and issued in May 2012, detailing strategies to achieve this goal primarily through recycling.

The City has three ordinances that detail mandated waste diversion or recycling requirements for development activities, detailed below. In addition, pursuant to the City's Significance Determination Thresholds, any discretionary project that may generate approximately 60 tons of waste or more during construction and/or operation is required to prepare a project-specific Waste Management Plan (WMP) to address disposal of waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals and must include: projected waste generation calculations and identification of the types of waste materials generated; description of how materials would be reused on-site; identification of source separation techniques for recycling; and identification of recycling facilities where waste would be taken if not reused on-site.

Storage Ordinance

Enacted in 2000, the Storage Ordinance (Section 142.0810 *et. seq.* of the Municipal Code) outlines standards to ensure that new residential and commercial development provide permanent, adequate, and convenient space for the storage and collection of refuse and recyclable material. The intent of the ordinance is to encourage recycling of solid waste to reduce the amount of waste material entering landfills and to meet the recycling goals established by the City Council and mandated by the state of California. This storage ordinance applies to the following type of developments: residential development involving two or more dwelling units, new non-residential development, and additions to existing developments where the gross floor area would be increased by 30 percent or more.

Recycling Ordinance

The City adopted the Recycling Ordinance (Section 66.0701 et seq. of the Municipal Code) in November 2007, and phased implementation of the ordinance over the next two years. In July 2012, the City updated the Recycling Ordinance to lower the exemption threshold for required recycling, thereby requiring all privately serviced

businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week to recycle. The purpose of the Recycling Ordinance was to establish requirements for recycling of recyclable materials generated from the aforementioned facilities and special events. The ordinance also requires the education of tenants or occupants on waste reduction or recycling. These requirements are intended to increase the diversion of recyclable materials from landfill disposal, conserve the capacity, and extend the useful life of the Miramar Landfill, and reduce greenhouse gas emissions.

Construction and Demolition Debris Recycling Ordinance

The City's Construction and Demolition Debris Recycling Ordinance (C&D Ordinance) (Section 66.0601, et seq. of the Municipal Code) is intended to increase the diversion of construction and demolition debris from landfill disposal, conserve the capacity, and extend the useful life of the Miramar Landfill. This ordinance requires applicants for a demolition or construction permit to estimate the volume of waste they will generate and post a deposit. The deposit is refunded after it is proven that a minimum of 50 percent of the construction and demolition debris generated by the development was recycled at an appropriate recycling or transfer facility.

5.14.2.3 Communications

a. San Diego Municipal Code Section 144.0240

Individual projects consisting of more than four lots are subject to Section 144.0240 of the Municipal Code, which requires privately owned utility systems and service facilities to be placed underground.

5.14.3 Significance Determination Thresholds

Based on the City's Significance Thresholds, impacts related to public utilities would be significant if the CPU would:

1. Result in a need for new systems, or require substantial alterations to existing utilities, including water, wastewater, reclaimed water, solid waste disposal, storm water infrastructure, and communication systems, the construction of which would create physical impacts.

5.14.4 Issue 1: Utilities

Would the CPU result in a need for new systems, or require substantial alternations to existing utilities, the construction of which would create physical impacts? These

systems include water, wastewater, reclaimed water, solid waste disposal, storm water infrastructure, and communication systems.

5.14.4.1 Impacts

The CPU would allow for additional residential, commercial, international business and trade, industrial, institutional, parks and open space, and right-of-way uses. As a programmatic document, this PEIR evaluates a worst-case scenario and also assumes that designated open space would remain entirely undeveloped. To project water/recycled water demands and sewer flows from new development, several types of planning criteria are typically defined: land use density criteria (dwelling units per acre), employment density criteria (employees per acre); population criteria (persons per dwelling unit); and unit flow generation criteria (gallons per person per day otherwise known as gallons per capita per day). Because the CPU does not exactly match the land use categories defined by the PUD or OWD criteria, a methodology for applying these criteria was developed in the Technical Infrastructure Study (Appendix L of the PEIR). Details of the planning criteria, which identify a uniform way to analyze the CPU across the two service providers, are located in Section 4.0 of the Technical Infrastructure Study (Appendix L of the PEIR).

The following is an analysis of the impacts for each applicable utility.

a. Water

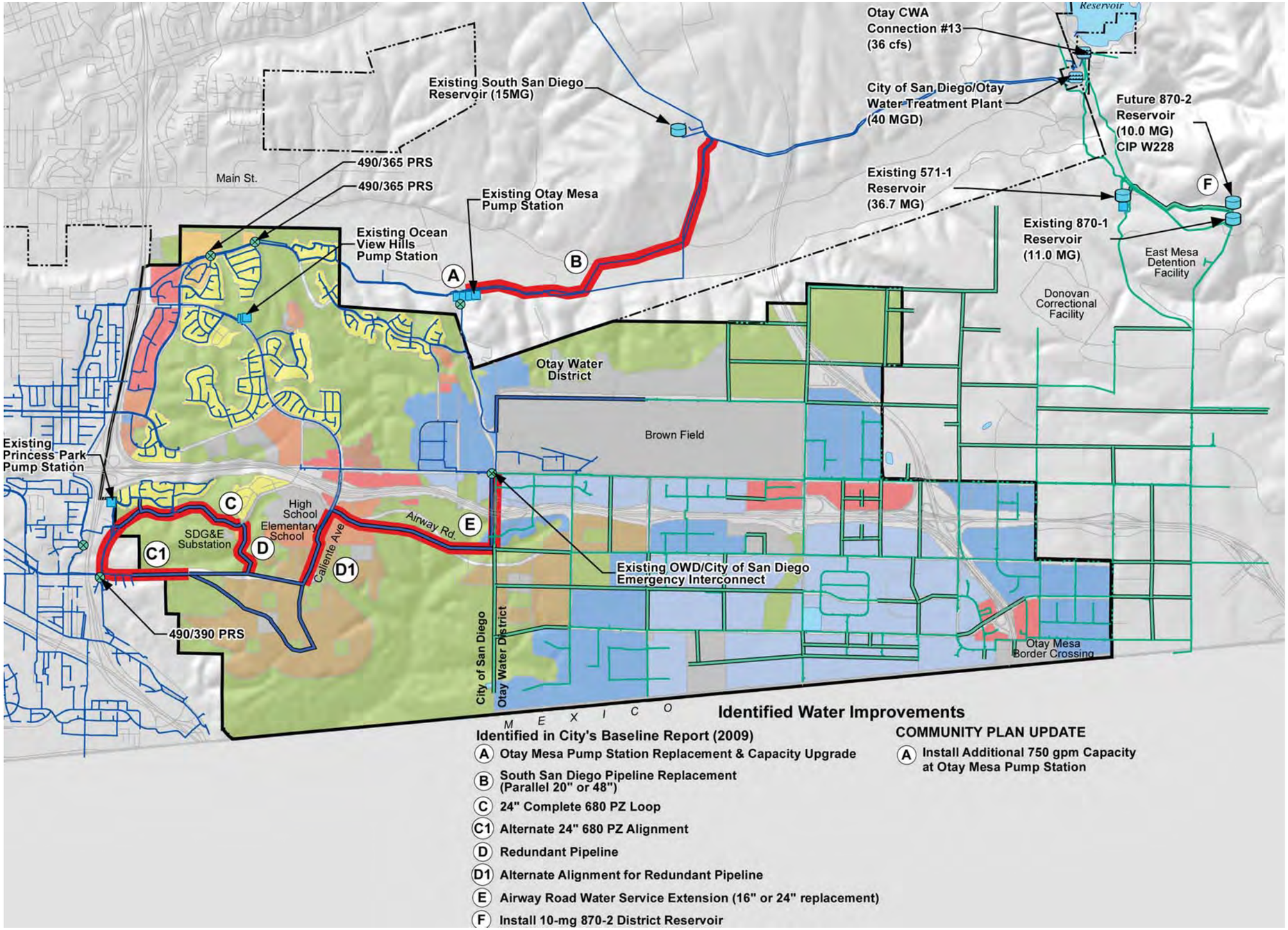
As previously detailed, the CPU area would be served by the City's PUD and the OWD. The City PUD's Otay Mesa service area was evaluated and reviewed in the Otay Mesa Master Plan Optimization Baseline Report (City's Baseline Report, as referenced in Appendix L). The City's Baseline Report recommended the following backbone infrastructure improvements to the City's PUD system (Figure 5.14-1):

A. Upgrade the Otay Mesa pump station to 11,500 gallons per minute (gpm) to meet ultimate demands. Additional capacity may also be installed at Ocean View Hills and Princess Park pump stations to meet demands, or an additional 1,000 gpm pumping capacity may be added to the Otay Mesa pump station.

B. Install 12,380 feet of new 20-inch pipe between the South San Diego Reservoir and the Otay Mesa pump station or replace the 33-inch South San Diego Pipeline 1 with a new 48-inch pipe for redundancy.

C. Install 2,400 feet of new 24-inch pipe in Otay Mesa Road between Hawken Drive and Crescent Bay Drive to provide redundancy in Otay Mesa and allow the Princess Park pump station to supply the 680 pumping zone.

Map Source: Atkins



Identified Water Improvements

Identified in City's Baseline Report (2009)

- (A) Otay Mesa Pump Station Replacement & Capacity Upgrade
- (B) South San Diego Pipeline Replacement (Parallel 20" or 48")
- (C) 24" Complete 680 PZ Loop
- (C1) Alternate 24" 680 PZ Alignment
- (D) Redundant Pipeline
- (D1) Alternate Alignment for Redundant Pipeline
- (E) Airway Road Water Service Extension (16" or 24" replacement)
- (F) Install 10-mg 870-2 District Reservoir

COMMUNITY PLAN UPDATE

- (A) Install Additional 750 gpm Capacity at Otay Mesa Pump Station

OMCP Boundary

Existing City Pipe

Existing Otay Pipe

Proposed Pipe

- City of San Diego
- Otay Water District

Identified Improvements

Community Plan Update

- BUSINESS AND INTERNATIONAL TRADE
- INDUSTRIAL
- VILLAGE CENTER
- COMMERCIAL
- INSTITUTIONAL
- VERY LOW
- LOW
- LOW MEDIUM
- MEDIUM
- MEDIUM HIGH
- OPEN SPACE & PARKS

0 Feet 3,000

FIGURE 5.14-1

Identified Improvements to the City of San Diego Water System

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The improvements identified are in response to projected growth within the PUD's Otay Mesa service area as a whole and not specific to the increase in potable water demand from the CPU.

The OWD's water system model was updated in October 2008 as part of the 2008 WRMP and again in November 2010, as part of the 2010 WRMP Update. Both the City's Baseline Report and the OWD's 2008 WRMP included water demands based on currently approved land uses.

In the OWD system, the 2008 WRMP did not identify any pumping deficiencies within the CPU area. A 10-million-gallon 870-2 Reservoir was recommended to be constructed to provide capacity for projected ultimate storage requirements. The proposed site for the 870-2 Reservoir is adjacent to the existing 870-1 Reservoir.

The City's Baseline Report did not evaluate demand under implementation of the CPU. The identified impacts and improvements for Otay Mesa detailed above are not capacity-based deficiencies. The CPU would increase potable water demands in the City's service area by only 0.36 mgd, which is not a significant increase to warrant transmission main upgrades. The improvements identified above would be required even if the CPU were not implemented, and thus are considered the minimum required improvements. Adding an additional 750 gpm of pumping capacity at the Otay Mesa pump station would provide sufficient capacity to serve the additional demands under buildout of the CPU.

In the OWD's 2010 WRMP Update, demands for the service area were revised to include potable water demands under implementation the CPU. The 2010 WRMP Update did not identify storage or pumping deficiencies under buildout of the CPU. As new development projects move forward, however, the OWD may require individual projects to submit detailed hydraulic studies.

The improvements identified above from the City's Baseline Report would be required regardless, and are not necessitated by implementation of the CPU. The addition of pumping capacity to the Otay Mesa pump station, which is necessitated by the CPU, would occur at an existing facility and would not result in significant new environmental impacts. The OWD has not identified any infrastructure improvements that are necessitated by implementation of the CPU.

Prior to approval of future projects implemented in accordance with the CPU, the City Director of the Public Utilities Department would determine, based on review of the project application, that future projects are sited and designed to avoid conflicts with existing public utilities in accordance with the CPU and City of San Diego Public Utilities Department Director and/or City Engineer guidance identified below. Future design of projects would be based on the recommendations of an anticipated detailed grade and alignment study that addresses potential conflicts with existing utilities and access road

realignments implemented in compliance with Council Policies 400-13 and 400-14. The realignments of utilities or access roads implemented in compliance with Council Policies 400-13 and 400-14 could result in secondary impacts on biological or archaeological resources. Biological and historical resource impacts are discussed in detail in Sections 5.4 and 5.5 of this PEIR.

Future applicants would be required to coordinate the location of improvements with the Development Services Department or the Director of the Public Utilities Department in compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities. If feasible, access to the sewer and water facilities would also be coordinated to provide combined access to storm water infrastructure facilities in order to minimize the impact on open space and canyons by having common access. The access would be proposed in a strategic location to facilitate Council Policies 400-13 and 400-14 and in accordance with the City of San Diego Canyon Sewer Cleaning Program & Long-Term Canyon Sewer Maintenance Program PEIR and Master Site Development Permit (when this is applicable within the CPU).

Therefore, impacts associated with utility system improvements would be less than significant at the program-level.

b. Wastewater

As detailed in Section 5.14.1.2, the OMTS Master Plan (2004) and subsequent Refinement and Phasing Report (2009) have approved environmental documents that have previously analyzed wastewater system upgrades and their associated environmental impacts in the CPU area. These improvements were based on currently approved land uses.

The 2009 Refinement Report concluded that the following facilities and improvements to the existing collection system would be required (Figure 5.14-2):

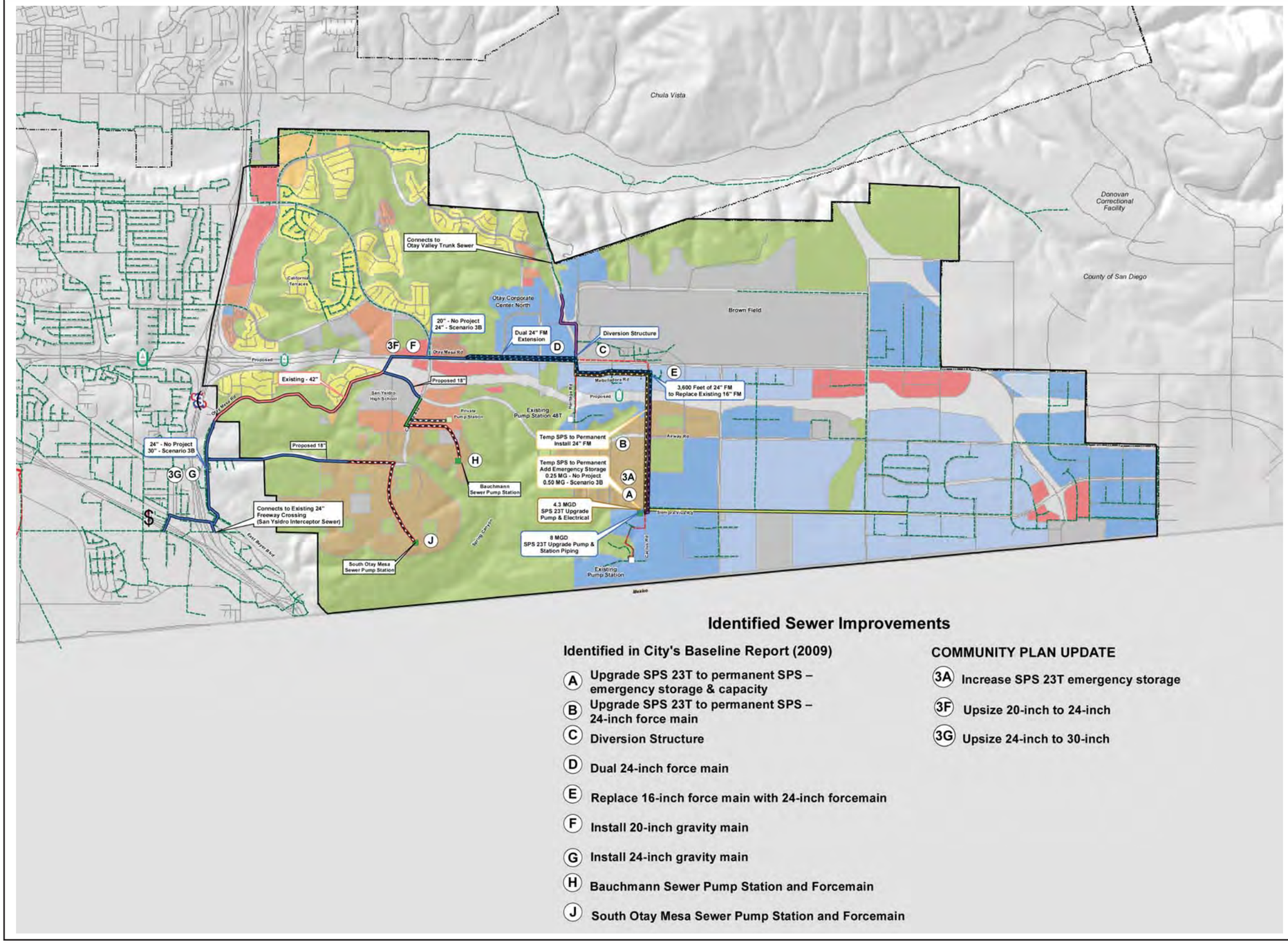
A. Upgrade Sewer Pump Station 23T from temporary to permanent status by adding 0.25 million gallons emergency storage and upgrading pumping capacity to 4.3 million mgd (8 mgd at buildout)

B. Upgrade Sewer Pump Station 23T from temporary to permanent status by installing 8,000 feet of 24-inch force main from Sewer Pump Station 23T to Heritage Road

C. Install diversion structure at Otay Mesa Road and Heritage Road to split flows between the OMTS and OVTS.

D. Install 8,000 feet of dual 24-inch force main along Otay Mesa Road from the diversion structure to the gravity sewer located in Otay Mesa Road.

Map Source: Atkins



Identified Sewer Improvements

Identified in City's Baseline Report (2009)

- (A) Upgrade SPS 23T to permanent SPS – emergency storage & capacity
- (B) Upgrade SPS 23T to permanent SPS – 24-inch force main
- (C) Diversion Structure
- (D) Dual 24-inch force main
- (E) Replace 16-inch force main with 24-inch forcemain
- (F) Install 20-inch gravity main
- (G) Install 24-inch gravity main
- (H) Bauchmann Sewer Pump Station and Forcemain
- (J) South Otay Mesa Sewer Pump Station and Forcemain

COMMUNITY PLAN UPDATE

- (3A) Increase SPS 23T emergency storage
- (3F) Upsize 20-inch to 24-inch
- (3G) Upsize 24-inch to 30-inch

FIGURE 5.14-2

Identified Improvements to the City of San Diego Wastewater System

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E. Replace 3,600 feet of 16-inch force main with 24-inch force main from SR-905 to the diversion structure.

F. Install 2,800 feet of 20-inch gravity main along Otay Mesa Road from proposed 24-inch dual force main (see, B above) to existing 42-inch gravity main.

The improvements identified are in response to projected growth within the Otay Mesa service area as a whole and not specific to the increase in demand from the CPU.

The increased growth from the CPU would increase wastewater flows by 1.33 mgd over buildout of the adopted community plan, for total projected wastewater generation of 9.68 mgd. This increase would trigger the need for the construction of additional sewer infrastructure, including an increase in the sizing of sewer pipelines. Overall, as shown in Figure 5.14-2, infrastructure improvements associated with the buildout of the CPU would include the following:

A. Increase emergency storage at sewer pump station 23T to 0.50 million gallons. The increased flows generated under CPU implementation would not require any additional capacity of sewer pump station 23T beyond 8 mgd.

B. Upsize 20-inch to 24-inch gravity main along Otay Mesa Road from force main to existing 42-inch gravity main.

C. Upsize 24-inch to 30-inch gravity main from existing 42-inch gravity main to existing 24-inch San Ysidro Trunk Sewer.

The 2004 OMTS Sewer Master Plan and 2009 Refinement Report identified these improvements as potentially required in future phases to accommodate wastewater generation associated with buildout of the CPU area. The three additional improvements identified above would occur within existing utility line easements and facilities, and therefore, would not result in significant new impacts to the environment.

As discussed above in Section 5.14.4.1a, for future projects implemented in accordance with the CPU, the City Director of the Public Utilities Department shall determine, based on review of the project application, that future projects are sited and designed to avoid conflicts with existing public utilities. Future applicants shall coordinate the location of improvements with the Development Services Department or the Director of the Public Utilities Department in compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities.

Therefore, impacts associated with wastewater systems would be considered less than significant at the program-level.

c. Reclaimed Water

Both the City PUD and OWD produce recycled water for use in the southern San Diego area. Currently, the OWD operates a 1.2-mgd reclamation plant and has an agreement to purchase up to 6 mgd of recycled water from the City. The City has the capability of producing up to 15 mgd of recycled water at its South Bay Water Reclamation Facility.

Recycled water service in the CPU area is planned to be provided by the OWD only. The ultimate buildout of the OWD's recycled water system is shown in Figure 5.14-3. The City currently has no specific plans to provide recycled water service to the CPU area; however, the provision of recycled water infrastructure would be a condition of approval for future discretionary projects within the CPU area. Because the City has no current plans to expand their distribution system in this area, recycled water service to the western side of the CPU area would likely require expansion of the OWD's recycled water system; however, no expansion is required or necessitated in conjunction with adoption of the CPU. An agreement between the OWD and the City would have to be negotiated to provide this service.

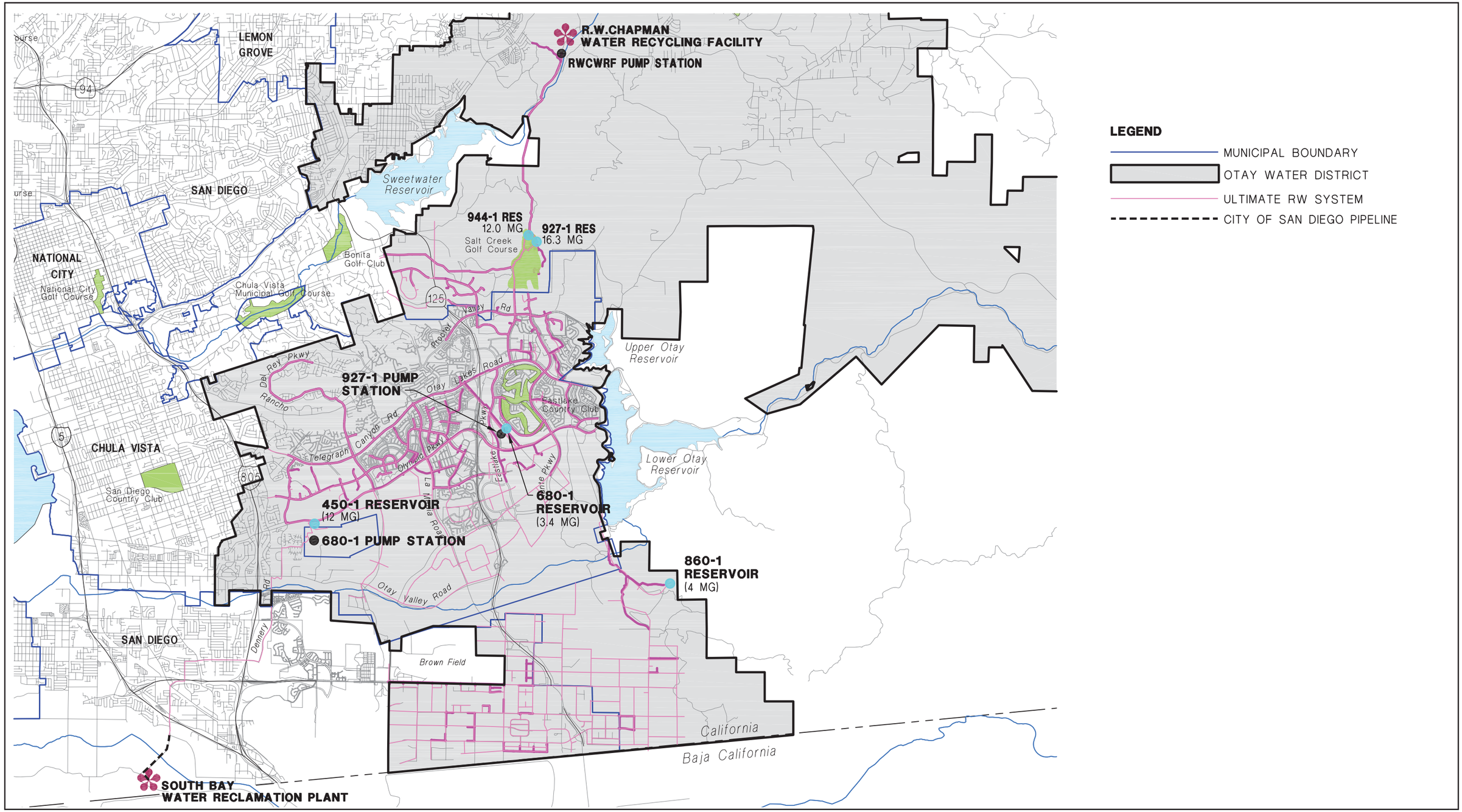
The OWD's 2008 WRMP included recycled water projections under the adopted community plan, while the 2010 WRMP incorporated projections under the CPU. The OWD's 2008 WRMP evaluated ultimate recycled water supply, storage, and pumping conditions, which would be required even if the CPU were not implemented. The CPU area is within the OWD's 860 pressure zone, which will ultimately be supplied from a new 860-1 reservoir through planned 30-inch diameter transmission mains.

The OWD's 2010 WRMP Update incorporated demands projected under the CPU, and did not identify additional storage or pumping deficiencies beyond improvements recommended in the 2008 WRMP.

The improvements identified above from the OWD's 2008 WRMP would be required regardless and are not necessitated by implementation of the CPU. The OWD has not identified any reclaimed water infrastructure improvements that are necessitated by implementation of the CPU.

As discussed above in Section 5.14.4.1a, for future projects implemented in accordance with the CPU, the City Director of the Public Utilities Department shall determine, based on review of the project application, that future projects are sited and designed to avoid conflicts with existing public utilities. Future applicants shall coordinate the location of improvements with the Development Services Department or the Director of the Public Utilities Department in compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities. Therefore, impacts associated with reclaimed water system improvements would be less than significant at the program-level.

Map Source: Atkins



LEGEND

- MUNICIPAL BOUNDARY
- OTAY WATER DISTRICT
- ULTIMATE RW SYSTEM
- CITY OF SAN DIEGO PIPELINE

Not to Scale

FIGURE 5.14-3

Otay Water District – Ultimate Recycled Water System

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d. Solid Waste

A significant direct impact associated with solid waste would occur if the CPU would:

- Require a new solid waste facility.
- Not meet the 75 percent solid waste diversion rate as mandated by AB 341.
- An indirect impact associated with solid waste would occur if the CPU would:
- Substantially increase collection and hauling services.
- Result in the loss of recycling/collection facilities due to changes in land use.

New Solid Waste Facility

Buildout of the CPU would not likely require the construction of a new solid waste facility. As previously detailed in Section 5.14.1.4, the three primary landfills used by the City and private franchise haulers have operating capacity beyond 2020. Furthermore, the distribution of where solid waste eventually ends up and the throughput of each landfill is difficult to track. Thus, at a program-level of analysis, it would not be feasible to accurately predict if solid waste would all end up at Otay Landfill, for example, thus causing it to become over capacity.

Solid Waste Diversion

Nevertheless, calculations can be made regarding the increase in solid waste generation due to changes in land use under the CPU. CalRecycle develops solid waste generation rates for different types of land uses. Solid waste generation rates estimate the amount of waste created by residences or businesses over a certain amount of time (day, year, etc.). Waste generation includes all materials discarded, whether or not they are later recycled or disposed in a landfill. Waste generation rates for residential and commercial activities can be used to estimate the impact of new developments on the local waste stream. Table 5.14-2 shows the estimated solid waste generation rates under the CPU.

TABLE 5.14-2
ESTIMATED SOLID WASTE GENERATION RATES

Use	Generation Rates	Existing Development		Proposed CPU (Buildout)	
		DUs/ Floor Area	Estimated Annual Generation	DUs/ Floor Area	Estimated Annual Generation
Single-family	7.8 lbs/unit/day	2,727 DUs	3,881 tons	4,273 DUs	6,082 tons
Multi-family	3.6 lbs/unit/day	1,106 DUs	726 tons	14,501 DUs	9,527 tons
Commercial	13 lbs/1000 sf/ day	2,653,000 sf	6,294 tons	4,522,000 sf	10,728 tons
Industrial	6.25 lbs/ 1000 sf/day	33,323,000 sf	38,009 tons	52,838,000 sf	60,268 tons
Institutional	0.007 lbs/sf/day	4,988,000 sf	6,372 tons	15,244,000 sf	19,474 tons
Agricultural				0	0
Total Estimated Annual Solid Waste Generation	--	--	55,282 tons	--	106,079 tons

NOTE: City Facilities and Transportation/Utilities not included in estimation.
DU = dwelling unit
sf= square feet
lbs = pounds

Implementation of the CPU would almost double the amount of waste generated within the CPU area under full buildout. However, projects implemented under the CPU would be required to comply with numerous regulations, including the City's Storage Ordinance, the Recycling Ordinance, and the C&D Ordinance. These regulations address the requirements for refuse and recyclable materials' deposit, diversion, and storage in an effort to achieve the City's overall 75 percent diversion goal, as set forth in AB 341.

The City's General Plan also addresses waste management through Policies PF-I.1 through PF-I.5, focusing in on waste recycling and diversion of materials in PF-I.2. Likewise, the CPU includes Public Facilities, Services and Safety Element Policies 6.5-1 through 6.5-5, which promote the planning for sufficient waste handling and disposal capacity to meet future needs, encourage future projects to divert construction and demolition debris beyond the 50 percent required by the City's C&D Ordinance, and require sufficient storage space for recycling containers in all new residential, commercial, and industrial development.

As previously detailed in Section 5.14.2.2, future discretionary projects under the CPU that would generate 60 tons of waste or more during construction and/or operation would be required to prepare a project-specific WMP to address disposal of waste generated during both short-term project construction and long-term operation.

Buildout of the CPU would not directly result in the need for a new landfill. However, compliance with the Storage, Recycling, and C&D ordinances alone would result in only a 40 percent diversion rate within in the CPU area. Future discretionary projects (that meet the threshold) would be required to prepare a WMP with site-specific waste

reduction measures in order to meet the state-mandated 75 percent diversion rate. Because all future projects within the CPU area may not be required to prepare a waste management plan or may not reduce project-level waste management impacts below a level of significance, the CPU cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste would be significant at the program-level.

Collection Services

The CPU would allow for residential development in areas that are currently undeveloped, thus resulting in the need for expanded solid waste collection services—either by the City as mandated by the People's Ordinance, or by private franchise haulers. Though not a direct environmental impact, the expansion of collection services would increase the costs incurred by the City, as collection services are free to the citizens under the People's Ordinance. Likewise, the increase in non-residential development under the CPU would increase the use of private franchise haulers. The City does not maintain an exclusive franchising agreement with private haulers. Several haulers compete for customers on an open market. This system does not promote efficient routing. This is a consideration when calculating trips generated by public services for new development anywhere in the City. As a result, solid waste collection in the Otay Mesa CPU area may result in a minor increase in traffic and its associated impacts (noise and air quality), but does not result in a separate significant impact.

Closure of Collection Facilities

Light industrial land uses, which include recycling and collection facilities, comprise approximately 8 percent of the CPU's overall land uses (see Table 5.1-1). Industrial uses are distributed throughout the central and eastern portions of the CPU area, primarily south of Otay Mesa Road and east of Heritage Road. Auto wrecking and dismantling facilities are concentrated in the area immediately west of Brown Field.

The CPU would not result in the direct loss of recycling or collection facilities. As shown on Figures 3-2 and 5.1-1, parcels that are currently designated for industrial use would remain with an industrial designation under CPU implementation. Furthermore, as previously shown in Table 5.14-2, implementation of the CPU would result in an approximately 50 percent increase in industrial square footage. Therefore, no indirect impacts related to the closure of recycling/collection facilities would occur.

e. Storm Water Infrastructure

As discussed in detail in Section 5.7, Hydrology/Water Quality, future development under the CPU would increase impervious surfaces, resulting in the potential for greater surface runoff and increased demands on existing storm water systems within the CPU area. No storm drains, or other community-wide drainage facilities are proposed for

construction in conjunction with adoption of the CPU. As individual development projects are implemented in accordance with the CPU, localized improvements to the storm water system would be required as part of the project design and review. All storm water facilities constructed in conjunction with future development would be reviewed for consistency with the Storm Water Standards.

Future projects implemented in accordance with the CPU may require storm water systems in undeveloped areas, or require improvements to existing storm water systems. Each project implemented in accordance with the CPU would be required to conduct a drainage study, design and build storm drain systems, as necessary, to serve the development. This storm water infrastructure would include components and methods to reduce and treat runoff and prevent pollutants from entering the storm drain system. The construction of these storm water systems could potentially result in physical impacts to the environment. However, projects would be required to reduce or provide mitigation for these impacts in accordance with the applicable Mitigation Framework, guidelines or through regulatory compliance prior to implementation.

Furthermore, all future projects would be required to adhere to regulations and General Plan and CPU policies and are required to comply with the City's Storm Water Standards as discussed in Section 5.7, Hydrology/Water Quality, of this PEIR. While the details of storm water infrastructure improvements would depend on the actual design of a future project, strict adherence to existing storm water regulations, conformance with General Plan and CPU policies, and project-specific review under CEQA would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance.

f. Communications Systems

There would be no significant impacts to cable and telephone services, as these are available through private utility companies that have the capacity to serve the CPU area. In addition, the City administers an undergrounding program and requires individual projects consisting of more than four lots to place utility systems and service facilities underground. Short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the CPU would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way.

5.14.4.2 Significance of Impacts

a. Water, Sewer, and Reclaimed Water

Improvements to water and recycled water systems have been previously identified in master planning documents detailed above, and would be required whether or not the

CPU were to be implemented. Therefore, impacts associated with water and reclaimed water system improvements would be less than significant at the program-level.

Additional wastewater system improvements beyond what have been identified in master planning documents would be necessitated by CPU implementation. The need for these improvements would not result in significant impacts, because the 2004 OMTS Sewer Master Plan and 2009 Refinement Report previously identified these improvements as required in future phases to accommodate buildout wastewater generation from the area. The three additional improvements identified above would occur within existing utility line easements and facilities and would not result in significant impacts to the environment. Therefore, impacts associated with wastewater systems would be considered less than significant at the program-level.

b. Solid Waste

The CPU would not result in the direct need for a new landfill. Compliance with the Storage, Recycling, and C&D ordinances and the requirement to prepare a WMP (in some instances) would contribute to the CPU meeting the state-mandated 75 percent diversion rate. However, because all future projects within the CPU area may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, the CPU cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste would be significant at the program-level.

c. Storm Water Infrastructure

No storm drains, or other community-wide drainage facilities are proposed for construction in conjunction with adoption of the CPU. All such facilities would be constructed in conjunction with future development projects implemented in accordance with the CPU, designed to the satisfaction of the City Engineer.

New storm water infrastructure systems would be required in previously undeveloped areas of the CPU, or improvements to existing storm water infrastructure systems would be required which could potentially result in physical impacts to the environment. As such, future projects implemented in accordance with the CPU would be sited and designed to minimize impacts on receiving waters; in particular, the discharge of identified pollutants to an already impaired water body. This would be accomplished through compliance with existing regulatory requirements contained in the City's Storm Water Runoff and Drainage Regulations of the LDC and as further outlined in HYD/WQ-1 and HYD/WQ-2 in Sections 5.7.3.3 and 5.7.6.3, Mitigation Framework.

At the project-level, adherence to existing storm water regulations, conformance with General Plan and CPU policies, and review under CEQA would assure that impacts

associated with the requirements for and/or construction of storm water infrastructure would be less than significant at the program-level.

d. Communications Systems

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

5.14.4.3 Mitigation Framework

a. Water, Wastewater, Reclaimed Water

Impacts would be less than significant; therefore, no mitigation would be required.

b. Solid Waste

UTIL-1: Pursuant to the City's Significance Determination Thresholds, discretionary projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the ESD and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).

b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).

c. Type of waste to be generated (demolition, construction, and occupancy).

d. Describe how the project will reduce the generation of C&D debris.

e. Describe how the C&D materials will be reused on-site.

f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.

g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.

h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.

i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.

j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.

k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.

l. Describe any International Standards of Operation 1, or other certification, if any.

c. Storm Water Infrastructure

Impacts would be less than significant; therefore, no mitigation would be required.

d. Communication Systems

Impacts would be less than significant; therefore, no mitigation is required.

5.14.4.4 Significance after Mitigation

a. Water, Wastewater, and Recycled Water

Prior to approval of future projects implemented in accordance with the CPU, the City would determine, based on review of the project application, that future projects are sited and designed to avoid impacts to resources in accordance with the applicable Mitigation Framework measures as well as regulatory requirements, and to avoid conflicts with existing public utilities satisfactory to the City of San Diego Public Utilities Department Director and/or City Engineer in conjunction with the regulatory requirements contained in the City's Storm Water Standards which would preclude the potential for significant impacts. Therefore, impacts would be less than significant.

b. Solid Waste

Discretionary projects that would generate 60 tons or more of waste would be required to prepare a WMP that is subject to City approval. Projects that do not meet this threshold, or that would be ministerial, would be required to adhere to the ordinances previously detailed in Section 5.14.2.2.

However, compliance with the Storage, Recycling, and C&D ordinances alone would result in only a 40 percent diversion rate within in the CPU area. Because all future projects within the CPU area may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, impacts related to solid waste to meet the 75 percent diversion requirement cannot be assured at the program-level. Therefore, impacts associated with solid waste would be significant and unavoidable at the program-level.

c. Storm Water Infrastructure

Although the details of storm water infrastructure improvements are unknown at this program-level analysis, strict adherence to existing regulatory requirements contained in the City's Storm Water Runoff and Drainage Regulations of the LDC and as further outlined in HYD/WQ-1 and HYD/WQ-2 in Sections 5.7.3.3 and 5.7.6.3, the applicable Mitigation Framework, and conformance with General Plan and CPU policies would assure that impacts associated with storm water infrastructure improvements would be less than significant at the project-level.

d. Communication Systems

Impacts would be less than significant.

5.15 Water Supply

This section addresses the availability of water supplies to serve the demands projected for the CPU area. Because the CPU area is serviced by two providers, two water supply assessments (WSAs) were prepared. The City's Public Utilities Department prepared a water supply assessment, on behalf of the City, dated September 2011. A water supply assessment for the portion of the CPU area serviced by the OWD was prepared by Robert Kennedy, P.E. Senior Civil Engineer, Otay Water District in consultation with Atkins and San Diego County Water Authority (March 2013). These water supply assessments are included as Appendices M-1 and M-2, respectively.

5.15.1 Existing Conditions

5.15.1.1 Water Supply

As indicated above, water service to the CPU area is provided by both the City PUD and the OWD. Both of these retail water suppliers depend on wholesale water supply from the SDCWA. The SDCWA, in turn, obtains most of its imported supply from the MWD. The SDCWA and MWD are actively pursuing programs and projects to diversify their water supply resources. MWD, SDCWA, OWD, and the City are each required by the state to prepare an Urban Water Management Plan (UWMP), which are to be updated every five years.

a. Metropolitan Water District

MWD is the supplier of water for most of urban southern California and is a wholesale supplier of water to its member public agencies. MWD owns and operates the Colorado River Aqueduct, and holds the largest contract entitlement to supplies from the California State Water Project. MWD also provides funding and coordination support to its member agencies for the development of local water supply projects, water conservation programs, and other water management measures. MWD is the agency that is ultimately responsible for projecting water supply needs for southern California and for implementing and managing water supplies to reliably meet those needs.

In October 2010, MWD updated its Integrated Resources Plan (IRP). MWD's IRP identifies a mix of resources (imported and local) that, when implemented, would provide 100 percent reliability for full-service demands through the attainment of regional targets set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers. The 2010 update to the IRP includes a three-component approach to maintaining a balance between imported water supplies and developing additional local resources:

1. A core resources strategy represents baseline efforts to manage water supply and demand conditions and to stabilize Metropolitan's traditional imports from the Colorado River and northern California through the Sacramento-San Joaquin Delta;

2. A cost-effective "supply buffer" will enable the region to adapt to future circumstances and foreseeable challenges. The buffer seeks to help protect the region from possible shortages caused by conditions that exceed the core resources strategy; and

3. Foundational actions guide the region in determining alternative supply options for long-range planning.

MWD's Regional UWMP was updated in November 2010. The 2010 Regional UWMP provides MWD's member agencies, retail water utilities, cities, and counties within its service area with, among other things, a detailed evaluation of the supplies necessary to meet future demands, and an evaluation of reasonable and practical efficient water uses, recycling, and conservation activities.

b. San Diego County Water Authority

The SDCWA currently obtains imported supplies from MWD and purchases transfer supplies of conserved agricultural water from Imperial Irrigation District (IID). The SDCWA has made large investments in MWD's facilities and will continue to include imported supplies from MWD in the future resource mix. The SDCWA's 2010 UWMP, adopted June 23, 2011, identifies a diverse mix of water resources as goals to be developed through 2035 to ensure long-term water supply reliability for the region. As discussed in the 2010 UWMP, the SDCWA and its member agencies are planning to diversify the region's supply portfolio and reduce purchases from MWD.

Table 5.15-1 summarizes the SDCWA's water supplies for future years, as documented in its 2010 UWMP.

TABLE 5.15-1
PROJECTED WATER SUPPLIES – WATER AUTHORITY SERVICE AREA
NORMAL YEAR
(acre-feet per year [AFY])

Water Supply Sources	2015	2020	2025	2030	2035
Water Authority Supplies					
Metropolitan Supplies	429,356	304,076	337,531	375,109	408,526
Water Authority/IID Transfer	100,000	190,000	200,000	200,000	200,000
AAC and CC Lining Projects	80,200	80,200	80,200	80,200	80,200
Proposed Regional Seawater Desalination	0	56,000	56,000	56,000	56,000
Member Agency Supplies					
Surface Water	17,932	17,932	17,932	17,932	17,932
Water Recycling	38,660	43,728	46,603	48,278	49,998
Groundwater	9,977	9,977	9,977	9,977	9,977
Groundwater Recovery	10,320	15,520	15,520	15,520	15,520
Total Projected Supplies	686,445	717,433	763,763	803,016	838,153

SOURCE: San Diego County Water Authority's 2010 Urban Water Management Plan.

The water supply update incorporates changes in water demands and projected water demands, taking into account changes in regional land use plans, including the CPU and evaluates adjustments to their water supply plans accordingly.

The SDCWA's 2010 UWMP contains a detailed shortage contingency analysis that addresses a regional catastrophic shortage situation and drought management. The analysis demonstrates that the SDCWA and its member agencies, through the Emergency Response Plan, Emergency Storage Project, and Drought Management Plan (DMP) are taking actions to prepare for and appropriately handle an interruption of water supplies.

c. City of San Diego

The City purchases approximately 85 to 90 percent of its water from the SDCWA, which supplies the water (raw and treated) through two aqueducts consisting of five pipelines. While the City imports a majority of its water, it uses two local supply sources to meet or offset potable demands: local surface water and recycled water. The City's nine surface water reservoirs have more than 408,000 AF of capacity and are connected directly or indirectly to three water treatment plants. These reservoirs capture local rainwater and runoff to supply approximately 12 percent of the City's water; they include Barrett, El Capitan, Hodges, Miramar, Morena, Murray, Lower Otay, San Vicente, and Sutherland.

Table 5.15-2 summarizes the City's existing and planned water supplies, as documented in its 2010 UWMP.

TABLE 5.15-2
CITY OF SAN DIEGO PROJECTED WATER SUPPLY AND DEMAND
AVERAGE YEAR CONDITIONS
(AFY)

	2015	2020	2025	2030	2035
Supply totals	240,472	260,211	276,375	288,481	298,860
Demand totals	240,472	260,211	276,375	288,481	298,860
Difference (supply minus demand)	0	0	0	0	0
Difference as a percent of supply	0	0	0	0	0
Difference as a percent of demand	0	0	0	0	0

SOURCE: City of San Diego 2010 UWMP.

The City has also planned for scenarios such as a single dry year and multiple dry year scenarios. As indicated in Tables 5.15-3 and 5.15-4, the City would be able to meet the water demands in the single dry and multiple dry year scenario from 2015 to 2035.

TABLE 5.15-3
CITY OF SAN DIEGO PROJECTED WATER SUPPLY AND DEMAND
SINGLE DRY YEAR CONDITIONS
(AFY)

Supply and Demand	2015	2020	2025	2030	2035
Supply totals	255,040	276,526	293,895	307,230	318,586
Demand totals	255,040	276,526	293,895	307,230	318,586
Difference (supply minus demand)	0	0	0	0	0

SOURCE: City of San Diego 2010 UWMP.

TABLE 5.15-4
CITY OF SAN DIEGO PROJECTED WATER SUPPLY AND DEMAND
MULTIPLE DRY YEAR CONDITIONS
(AFY)

Multiple Dry Year	Supply and Demand	Supply and Demand Comparison – Multiple Dry Year Events				
		2015	2020	2025	2030	2035
First year supply	Supply totals	257,587	278,451	296,319	309,230	320,382
	Demand totals	257,587	278,451	296,319	309,230	320,382
	Difference	0	0	0	0	0
	Difference as a percent of supply	0	0	0	0	0
	Difference as a percent of demand	0	0	0	0	0
Second year supply	Supply totals	267,323	288,723	306,726	320,467	332,038
	Demand totals	267,323	288,723	306,726	320,467	332,038
	Difference	0	0	0	0	0
	Difference as a percent of supply	0	0	0	0	0
	Difference as a percent of demand	0	0	0	0	0
Third year supply	Supply totals	281,466	303,004	322,166	334,720	346,823
	Demand totals	281,466	303,004	322,166	334,720	346,823
	Difference	0	0	0	0	0
	Difference as a percent of supply	0	0	0	0	0
	Difference as a percent of demand	0	0	0	0	0

SOURCE: City of San Diego 2010 UWMP.

d. Otay Water District

The OWD service area is generally located within the south-central portion of San Diego County and includes approximately 125 square miles. The OWD serves portions of the unincorporated communities of southern El Cajon, La Mesa, Rancho San Diego, Jamul, Spring Valley, Bonita, and Otay Mesa, the eastern portion of the City of Chula Vista, and a portion of the CPU area within the City of San Diego.

The OWD obtains an average of approximately 10 percent of its water supplies from local recycled water, but purchases most of its supply from the SDCWA. The District has documented its water supply projections based on their 2010 WRMP Update. Table 5.15-5 presents the existing and projected water supply needs for the OWD, as derived from their 2010 UWMP.

In evaluating the availability of sufficient water supply, future development within the CPU area would be required to participate in the development of alternative water supply project(s). This would be achieved through payment of the New Water Supply Fee adopted by the Otay Water District Board in May 2010 at the time that water connection applications are submitted to OWD for review. These water supply projects are in addition to those identified as sustainable supplies in the current Water Authority and MWD UWMP, IRP, Master Plans, and other planning documents and are in response to regional water supply issues related to climatological, environmental, legal, and other challenges that impact water supply source conditions.

TABLE 5.15-5
OTAY WATER DISTRICT WATER SUPPLY AND DEMAND
(AFY)

Water Supply Sources	2015	2020	2025	2030	2035
Water Authority[1]	40,483	41,321	44,015	45,974	48,614
Recycled Water	4,400	5,000	5,800	6,800	8,000
Groundwater	0	0	0	0	0
Supply Totals	44,883	46,321	49,815	52,774	56,614
District Demands[2]	44,883	53,768	63,811	70,669	77,171
Additional Conservation Target[3]	0	-7,447	-13,996	-17,895	-20,557
Demand Totals with Conservation	44,883	46,321	49,815	52,774	56,614
Difference	0	0	0	0	0

[1]Water Authority supplies assume that the District demands meet their 2010 and 2015 SBX 7-7 gpcd (gallons per capita per day) water use targets.
[2]District demand projections based on SANDAG population projections and near-term annexations.
[3]Additional conservation target is conservation required for District to meet their 2010 and 2015 SBX 7-7 gpcd target demands
SOURCE: Supply requirement and demand data based upon Otay Water District Draft 2010 UWMP.

5.15.1.2 Regulatory Framework

a. Senate Bills 610 and 221

SB 610 and SB 221 amended state law, effective January 1, 2002, to improve the link between information on water availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability to be provided to the City decision makers prior to approval of specified large development projects. Under SB 610, water assessments would be furnished to the City by the water-serving agencies for inclusion in any environmental documentation for future projects (as defined in the Water Code 10912[a] subject to CEQA).

In addition under SB 221, approval by the City of certain residential subdivisions requires an affirmative written verification that sufficient water supply is available prior to approval of any tentative map for that development. The City ensures that major projects are sited and designed to minimize impacts to water resources. Pursuant to SB 610, the City ensures that the water purveyor prepares a water supply assessment for the following developments:

- Residential development of more than 500 units.
- Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space.
- Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space or occupying more than 40 acres of land.
- Hotels or motels having more than 500 rooms.
- Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space or occupying more than 40 acres of land.
- Mixed-use projects that include one or more of the above types of projects.
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

Prior to approval by the City of certain residential subdivisions, SB 221 also requires an affirmative written verification that sufficient water supply is available prior to approval of the project.

b. Water Conservation Regulations/Programs

Senate Bill X7-7

SB X7-7 (California Water Code Section 10608.20) was enacted to require retail urban water agencies within the state to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. To support compliance with SB X7-7, the SDCWA offers incentives for water conservation measures to residential, commercial, industrial, and institutional users. The regional SoCal Water$mart rebate program offers rebates to residences for high-efficiency clothes washers, weather-based irrigation controllers, rotating nozzles, and other devices. Through the program over 22,400 high-efficiency clothes washers and 1.5 million square feet of synthetic turf was installed. The installation of these devices and others rebated through the program are expected to generate a lifetime water savings of more than 22,000 AF. Commercial, Industrial and Institutional users are offered participation in SDCWA CII Voucher Incentive Program (VIP) and, more recently in MWD's regional CII Save A Buck Program. Through both the VIP and Save A Buck programs over 56,000 commercial, industrial, and institutional water-saving devices were installed that provided 18,400 AF of water savings from 1993 to 2009.

SDCWA

The SDCWA 2010 UWMP addresses plans to address supply shortages due to a catastrophe, drought, or other situations. The SDCWA's Integrated Contingency Plan (ICP) and Emergency Storage Plan (ESP) were developed to protect public health and safety and to prevent or limit economic damage that could occur from a severe shortage of water supplies. The ICP provides actions to be taken in the event of an earthquake or power outage. The ESP provides actions that the SDCWA will take to operate ESP facilities to address up to a 6-month supply interruption, which could result from earthquakes or other natural disasters. Likewise, the SDCWA has the Water Authority's Water Shortage and Drought Response Plan (WSDRP), which serves as the region's guide to managing water resources during draught.

City of San Diego PUD

UWMP. The City's 2010 UWMP includes water conservation BMPs. These demand management measures are intended to support the conservation of water throughout the City. Incentive programs include water surveys, implementation of SoCal Water$mart rebate program for residential properties and Save A Buck program for commercial, industrial and institutional and multi-family properties. The "No Time To Waste, No Water To Waste" public outreach and education campaign raises awareness to drought alert levels and new, mandatory water use restrictions and reduces water usage by 8 percent from SDCWA projections.

Municipal Code. The Emergency Water Regulations (Municipal Code Section 67.3801 et seq.) establishes water management requirements necessary to conserve water, enable effective water supply planning, assure reasonable and beneficial use of water, prevent waste of water, prevent unreasonable use of water, prevent unreasonable method of use of water within the City service area in order to assure adequate supplies of water to meet the needs of the public, and further the public health, safety, and welfare, recognizing that water is a scarce natural resource that requires careful management not only in times of drought, but at all times.

Municipal Code Section 147.0401 requires that all buildings, prior to a change in ownership, be certified as having water-conserving plumbing fixtures in place. All residential, commercial, and industrial water customers who receive water from the City's Public Utilities Department are affected by these regulations. Section 142.0401 of the Municipal Code requires the use of drought-tolerant landscaping as further means of reducing water consumption.

The City's Landscape Standards (Municipal Code Section 142.0401 et seq.) require all proposed planting and irrigation work to conserve water through low-water-using planting and irrigation design. The regulations provide detailed tables identifying specific restrictions in types of landscaping allowable for differing types of development. Likewise, the Landscape Standards, which are part of the City's Land Development Manual, establish the minimum plant material, irrigation, brush management, and landscape-related standards for work done in accordance with requirements of Land Development Code. They provide guidelines and alternative methods to meet regulations based on various site conditions. Additionally, the Landscape Standards provide the technical standards to create and maintain landscapes that conserve and efficiently use water.

OWD

The OWD promotes water conservation at a variety of events, including those involving developers in its service area. In addition, the OWD developed and manages a number of its own programs such as the Cash for Water$mart Plants retrofit program, the Water$mart Irrigation Upgrade Program, and the Commercial Process Improvement Program. Pursuant to SB X7-7, the OWD focuses on water use reduction and measures including receiving additional recycled water from local recycling facilities and requiring new developments to use recycled water for irrigation purposes where allowed by the County.

UWMP. The OWD 2010 UWMP includes water conservation BMPs. These demand management measures are intended to support the conservation of water throughout the OWD service area. Incentive programs include water surveys, implementation of SoCal Water$mart rebate program for residential properties and Save A Buck program for commercial, industrial and institutional and multi-family properties.

WRMP. The Otay Water District's WRMP outlines a comprehensive program for the orderly and phased development of potable and recycled water supply, storage, transmission, and distribution through ultimate buildout of the land within the OWD, according to local land use approvals and planning. The WRMP is updated at five- to seven-year intervals to reflect the most current land use information.

c. General Plan

The General Plan includes policies pertaining to water conservation, as shown in Table 5.15-6.

TABLE 5.15-6
CONSERVATION ELEMENT POLICIES RELATED TO WATER CONSERVATION/LANDSCAPE DESIGN

Policy	Description
CE-D.1	Implement a balanced, water conservation strategy as an effective way to manage demand by: reducing dependence on imported water supplies; maximizing the efficiency of existing urban water and agricultural supplies through conservation measures/programs; and developing alternative, reliable sources to sustain present and future water needs.
CE-D.2	Protect drinking water resources by implementing guidelines for future development that may affect water supply watersheds, reservoirs and groundwater aquifers. The guidelines should address site design, Best Management Practices (BMPs) and storm water treatment measures.
CE-D.4	Coordinate local land use planning with state and regional water resource planning to help ensure that the citizens of San Diego have a safe and adequate water supply that meets existing needs and accommodates future needs
UD-A.8.b	Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.

SOURCE: City of San Diego 2008.

5.15.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, impacts related to water supply would be significant if the CPU would:

1. Result in the use of excessive amounts of potable water beyond projected available supplies.

2. Allow for the use of predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes.

5.15.3 Issue 1: Water Supply

Would the CPU affect the ability of the water-serving agencies (City of San Diego, SDCWA, and OWD) to provide water?

5.15.3.1 Impacts

a. City of San Diego Public Utilities Department

Pursuant to SB 610 and SB 221, the City PUD prepared a WSA dated September 2011, to provide certification that there would be sufficient water supply available to support the portion of the CPU within the PUD service area. Specifically, the WSA evaluated water supplies that are or will be available during a normal, single dry year, and multiple dry years over a 20-year period, to meet the estimated demands of the CPU.

As shown in Tables 5.15-2, 5.15-3, and 5.15-4, above, the estimated PUD service area water supply for the year 2035 for a normal year, single dry year, and multiple dry years is 298,860 AFY, 318,586 AFY, and 346,823 AFY, respectively. Tables 6-5, 6-7 and 6-8 of the WSA (which is included as Appendix M-2 to this PEIR), show the estimated water supply will meet the City's projected water demands. These findings substantiate that there are sufficient water supplies over a 20-year planning horizon to meet the projected demands within the PUD service area in normal, dry year, and multiple dry year forecasts.

Water demand associated with accelerated forecasted growth is intended to account for a portion of SANDAG's residential land use development currently projected to occur between 2035 and 2050. However, this demand has the potential to occur on an accelerated schedule. Under this model, the difference between the planned and proposed water demands of the CPU is accounted for in the SDCWA 2010 UWMP.

TABLE 5.15-7
COMMUNITY PLAN UPDATE WATER DEMAND ANALYSIS (CITY PUD)

Planned Water Demands for OMCP per the 2010 UWMP		
Single-family[1]	4,040 units	1,767 AFY
Multi-family[2]	8,487 units	2,540 AFY
Employees[3]	16,149	1,086 AFY
Total Planned		5,393 AFY
Projected Water Demands for the CPU (within the City's PUD Service Area)		
Land Use		
Single-family	4,273 units[4]	1,869 AFY
Multi-family	9,255 units[4]	2,769 AFY
Employees	13,758	925 AFY
Total Projected		5,563 AFY
Net Water Demands		
Projected CPU demand		5,563 AFY
Planned – City of San Diego 2010 UWMP		5,393 AFY
Planned from Water Authority's Accelerated Forecasted Growth		170 AFY
Net Unanticipated Demands		0

AFY = acre-feet per year.
[1]116 gallons per person per day is the City's acceptable standard for single-family water consumption. The SANDAG Series 12 forecast projects a residential occupancy of 3.42 persons per household and a vacancy rate of 1.6% for single-family units in 2035.
[2]80 gallons per person per day is the City's acceptable standard for multi-family water consumption. The SANDAG Series 12 forecast projects a residential occupancy of 3.42 persons per household and a vacancy rate of 2.3% for multi-family units in 2035.
[3]The utilization of 60 gallons per person per day is the City's acceptable standard for employment water use.
[4]The numbers of single- and multi-family units are based on the April 2011 draft CPU and represent a worst-case scenario for CPU area buildout within the City PUD Service area. The total number of CPU units is 18,774.

As demonstrated in Table 5.15-7, the projected water demand of the CPU with the City's PUD service area is estimated at 5,563 AFY. Per the City's 2010 UWMP, the planned water demand for the adopted Otay Mesa Community Plan is 5,393 AFY. The remaining portion of the estimated 170 AFY is accounted for through the Accelerated Forecast Growth demand increment of the SDCWA 2010 UWMP. Therefore, based on the findings of the City's 2010 UWMP and the Water Authority's 2010 UWMP, the CPU would result in no unanticipated demands.

In summary, the WSA concluded that the CPU is consistent with the water demand assumptions included in regional water resource planning documents. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD. The projected demands of the CPU area, in addition to existing and planned future water demand of the PUD are capable of being served.

b. Otay Water District

Pursuant to SB 610 and SB 221, a WSA for the CPU also has been prepared by OWD in consultation with Atkins, the SDCWA, and the City of San Diego. The WSA evaluates water supplies that are planned to be available during normal, single dry year, and multiple dry water years during a 20-year planning horizon to meet existing demands, expected demands of the CPU, and reasonably foreseeable planned future water demands served by OWD.

As shown in Table 5.15-8, below, the expected potable water demand for the CPU within the OWD service area is 4.7 million gallons per day (mgd) or about 5,273 AFY and is slightly less than what was projected in the District's WRMP, updated November 2010, which estimated 4.92 mgd for the CPU, or about 5,412 AFY.

TABLE 5.15-8
COMMUNITY PLAN UPDATE WATER DEMAND ANALYSIS (OWD)

CPU Land Use	Quantity[1]	Potable Water Factor	Unit Rate	Net Potable Unit Rate	Average Demand (gpd)
Multi-family Residential	5,246 units[2]	85%	300 gpd/unit	255 gpd/unit	1,337,730
Commercial/Office	142 acres[2]	90%	1,785 gpd/acre	1,607 gpd/acre	228,123
Industrial	876 acres[2]	95%	893 gpd/acre	848 gpd/acre	743,155
IBT	1,286 acres[2]	90%	1,800 gpd/acre	1,620 gpd/acre	2,083,320
Institutional	220 acres[2]	80%	1,785 gpd/acre	1,428 gpd/acre	314,160
Parks	61 acres[2]	0%	2,155 gpd/acre	0 gpd/acre	0
TOTAL					4,706,488

[1]Acres and units are those CPU land uses located within the boundaries of the OWD Service Area
[2]The numbers of single and multi-family units are based on the April 2011 draft CPU and represent a worst-case scenario for CPU area buildout within the City PUD Service area. The total number of CPU units is 18,774.

The current projected recycled water demand for the proposed CPU within the OWD service area is provided in Table 5.15-9, and totals approximately 0.69 mgd or about 774 AFY, representing about 14 percent of total CPU demand, within the OWD service area. Future development implemented in accordance with the CPU located within OWD service area would be required to use recycled water for irrigation and other appropriate uses. The primary benefit of using recycled water is that it would offset the potable water demand by an estimated 774 AFY. The WRMP Update and the 2010 UWMP anticipated that future development within the CPU area would use both potable and recycled water.

As shown in Table 5.15-10 below, the estimated OWD service area water supply for the year 2035 for a normal year is 56,614 AF. As shown in Table 5.15-11, the estimated OWD service area water supply for the year 2012 for single dry year was 41,566 AF. As

shown in Table 5.15-11, the estimated OWD service area water supply for the year 2012 for multiple dry year was 50,291 AF.

TABLE 5.15-9
COMMUNITY PLAN UPDATE RECYCLED WATER AVERAGE DEMANDS (OWD)

CPU Land Use	Quantity[1]	Recycled Water Factor	Net Recycled Acreage	Unit Rate	Average Demand (gpd)
Multi-family Residential	191 acres[2]	15%	29	2,155 gpd/acre	61,741
Commercial/Office	142 acres[2]	10%	14	2,155 gpd/acre	30,601
Industrial	876 acres[2]	5%	44	2,155 gpd/acre	94,389
IBT	1,286 acres[2]	10%	129	2,155 gpd/acre	277,133
Institutional	220 acres[2]	20%	44	2,155 gpd/acre	94,820
Parks	61 acres[2]	100%	61	2,155 gpd/acre	131,455
TOTAL			**321**		**690,139**

[1]Acres and units are located within the boundaries of the OWD Service Area
[2]The numbers of single- and multi-family units are based on the April 2011 draft CPU and represent a worst-case scenario for CPU area buildout within the City PUD Service area. The total number of CPU units is 18,774.

Table 5.15-10 presents the forecasted balance of water demands and required supplies for the OWD service area under average or normal year conditions. The total actual demand for FY 2010 was 33,270 AF. The demand for FY 2010 was 5,635 acre feet lower than the demand in FY 2005 of 38,905 AF. The drop in demand was a result of the unit price of water, the conservation efforts of users as a result of the prolonged drought, and the economy.

TABLE 5.15-10
PROJECTED BALANCE OF WATER DEMANDS AND SUPPLIES NORMAL YEAR CONDITIONS (AF)

Description	FY 2015	FY 2020	FY 2025	FY 2030	FY 2035
Demands					
Otay WD Demands	44,883	53,768	63,811	70,669	77,171
Additional Conservation Target	0	(7,447)	(13,996)	(17,895)	(20,557)
Total Demand	44,883	46,321	49,815	52,774	56,614
Supplies					
Water Authority Supply	40,483	41,321	44,015	45,974	48,614
Recycled Water Supply	4,400	5,000	5,800	6,800	8,000
Total Supply	44,883	46,321	49,815	52,774	56,614
Supply Surplus/(Deficit)	**0**	**0**	**0**	**0**	**0**

Table 5.15-11 presents the forecasted balance of water demands and supplies for the OWD service area under single dry year and multiple dry year conditions as from the

OWD 2010 UWMP. Dry year demands assumed to generate a 6.4% increase in demand over normal conditions for each year in addition to new demand growth.

TABLE 5.15-11
PROJECTED BALANCE OF WATER DEMANDS AND SUPPLIES
SINGLE DRY AND MULTIPLE DRY YEAR CONDITIONS
(AF)

	Normal Year FY 2011	Single Dry Year FY 2012	Multiple Dry Years		
			FY 2013	FY 2014	FY 2015
Demands					
Otay WD Demands	37,176	41,566	43,614	46,385	50,291
Total Demand	37,176	41,566	43,614	46,385	50,291
Supplies					
Water Authority Supply	33,268	37,535	39,460	42,108	45,891
Recycled Water Supply	3,908	4,031	4,154	4,277	4,400
Total Supply	37,176	41,566	43,614	46,385	50,291
Supply Surplus/(Deficit)	**0**	**0**	**0**	**0**	**0**

District Demand totals with SBX7-7 conservation target achievement plus single dry year increase as shown. The Water Authority could implement its Drought Management Plan (DMP). In this instances, the Water Authority may have to allocate supply shortages based on it equitable allocation methodology in its DMP.

The WSA assesses, demonstrates, and documents that sufficient water supplies are planned for and are intended to be acquired, as well as the actions necessary and status to develop these supplies, to meet projected water demands of the CPU 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. In addition, the regional water suppliers along with OWD fully intend to maintain sufficient reliable supplies through the 20-year planning horizon under normal, single, and multiple dry year conditions to meet the projected demands of the CPU as noted above.

5.15.3.2 Significance of Impacts

a. City of San Diego PUD

Based on the findings of the WSA, there is sufficient water supply to serve existing demands, projected demands of the CPU, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, impacts would be less than significant.

b. Otay Water District

Based on the findings of the WSA, there is sufficient water supply to serve existing demands, projected demands of the CPU, and future water demands within the OWD's

service area for a 20-year planning horizon in normal, single and multiple dry year forecasts. Therefore, impacts would be less than significant.

5.15.3.3 Mitigation Framework

a. City of San Diego Public Utilities Department

Impacts would be less than significant; therefore, no mitigation is required.

b. Otay Water District

Impacts would be less than significant; therefore, no mitigation is required.

5.15.3.4 Significance After Mitigation

Impacts would be less than significant.

5.15.4 Issue 2: Landscape Plans

Would the CPU allow for the use of predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes?

5.15.4.1 Impacts

Buildout under the CPU would result in the placement of new landscaping throughout the CPU area requiring water use for irrigation purposes. Future development would be required to adhere to existing regulations to assure that acceptable plants are selected for landscaping. Additionally, based on plants selected, an applicant would be granted a maximum applied water allowance according to Section II, Irrigation Systems, of the Landscape Standards in the City's Land Development Code, the maximum applied water allowance would be based on the landscape design package approved for the development project.

The Landscape Standards, found in the City's Land Development Manual, includes a section on Plant Material Guidelines, along with specific plant selection criteria, general information and resources for water conserving plants. Within the Landscape Regulations, three general categories of plants are further defined: Preferred, Acceptable, and Prohibited. Preferred plants are water-conserving plants that are easily maintained and have no known history of problems, and acceptable plants are those satisfying minimum performance standards. Acceptable plants are those which satisfy minimum performance standards for the special site area in question and are easily maintained. Prohibited plants are those which do not satisfy the minimum performance standards for the site area in question and are generally non-native or invasive species.

In addition to identifying specific plants, the Landscape Standards provide guidance for drainage installation and maintenance. This assures landscape systems are designed, constructed, and managed to maximize overall irrigation efficiency within the limits established by the maximum applied water allowance.

Adherence to the General Plan and the CPU policies would also serve to assure the use of drought-tolerant plantings for project landscape plans. Landscape design policies in the CPU Urban Design Element, like the General Plan Policy UD-A.8.b, require the use of sustainable landscape practices, including water conservation and storm water management (Policy 4.3-7(b)). Additionally, the CPU Mobility Element requires the planting of drought-tolerant landscaping along sidewalks and transit centers (Policies 3.2-2 and 3.3-5).

5.15.4.2 Significance of Impacts

All future development must conform with existing regulations, as well as the General Plan and CPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. Impacts would therefore be less than significant.

5.15.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.15.4.4 Significance After Mitigation

Impacts would be less than significant.

5.16 Population and Housing

This section addresses the existing population and the proposed introduction of new housing and new density/land use allocation within the CPU area.

5.16.1 Existing Conditions

5.16.1.1 Citywide and CPU Area Population and Housing

During the 2000 census, the population for the City was recorded at more than 1.2 million people, an estimated 10 percent increase over 1990 levels of 1.1 million. The population of San Diego continues to grow, and in 2012 was estimated to be more than 1.3 million people (SANDAG 2012a). The population estimates compiled by SANDAG indicate that the population of the City will increase approximately 46 percent to more than 1.9 million people by 2050 (SANDAG 2010a).

Citywide, the total housing units to accommodate the population growth will also increase. From 1990 to 2000, there was an increase in housing units from approximately 432,000 units to approximately 470,000 units. In 2012, total housing units were estimated at approximately 518,137units (SANDAG 2012a), and this is anticipated to increase to more than approximately 722,000 units by 2050 (SANDAG 2010a). Single-family detached units currently make up just over 40 percent of the housing stock (SANDAG 2012a). This percentage has been dropping as new multi-family units are built.

According to SANDAG, the population for the CPU area was 15,323 residents in 2012 (SANDAG 2012b). By 2030, this population is projected to increase to 46,392; and to 65,368 by 2050 (SANDAG 2010b). In addition, the total housing units in the CPU area are expected to increase from 3,833 to 13,850 by 2030; by 2050, this number is estimated to be 19,600. Table 5.16-1 shows the projected population and housing for the CPU area between 2012 and 2050.

TABLE 5.16-1
SANDAG POPULATION AND HOUSING ESTIMATES IN THE CPU AREA
(2012 to 2050)

Population and Housing	2012	2030	2050	Percent Change 2012-2050
Total Population	15,323	46,392	65,368	326
Total Housing Units	4,213	13,850	19,600	365
Single-family housing units	2,745	5,125	5,125	87
Multi-family housing units	1,468	8,725	14,475	886

SOURCE: SANDAG 2010b and 2012b

Table 5.16-2 provides a comparison of the 2012 population and housing estimates for the CPU area and the City as a whole. As seen in this table, the CPU area makes up approximately 0.2 percent of the citywide population. In addition, while approximately 65 percent of the housing stock in the CPU area is single-family, single-family detached housing comprises just 41 percent of the housing stock citywide. At an average of 3.77 people per household (pph), the pph ratio in the CPU area is higher than that of the citywide average of 2.59 pph (SANDAG 2012a and 2012b). Finally, the median household income in the CPU area of approximately $87,578is approximately 28 percent higher than the median income citywide, which is approximately $68,674 (SANDAG 2012a and 2012b).

TABLE 5.16-2
POPULATION AND HOUSING ESTIMATES (2012)

Area and Population	Housing Stock				Household Size	Median Household Income
	Single-Family[1]		Multi-Family			
	Units	%	Units	%		
City of San Diego 1,321,315	280,289	55	232,556	45	2.59	$68,674
Otay Mesa 15,323	2,745	65	1,468	35	3.77	$87,578

SOURCE: SANDAG 2012a and 2012b.
[1]Includes both single-family attached and detached

Adoption of the MSCP in 1997 reduced the City's designated residential acreage in the CPU area by approximately 2,000 acres, thus deleting the potential for nearly 6,000 units from the CPU area that had been planned for by the 1981 community plan. Existing residential development has occurred within the Northwest District through the precise planning process. Most of the neighborhoods within the precise plans are developed or have been approved. The development pattern is predominantly single-family dwelling units, with several multi-family dwelling unit complexes dispersed throughout this area.

5.16.1.2 Plans and Policies

a. SANDAG's Regional Growth Forecast

SANDAG is the regional agency responsible for preparing population, housing, and employment projections for the San Diego region. In February 2010, SANDAG adopted the 2050 Regional Growth Forecast. This forecast represents SANDAG's estimate of population, housing, land use, and economic growth to the end of the TransNet program in 2048. According to this forecast, by 2050, the CPU area would experience a 405 percent increase in population and 417 percent increase in housing stock over what was identified for 2008 (SANDAG 2010b).

b. SANDAG Regional Comprehensive Plan and Regional Housing Element

SANDAG's RCP provides a growth management strategy that aims to preserve natural resources and limit urban sprawl. In accordance with smart growth principles, the overall goal of the RCP is to strengthen the integration of local and regional land use, transportation, and natural resource planning. Strategies to locate new housing within already urbanized communities close to jobs and transit helps conserve open space and rural areas, rejuvenate existing neighborhoods, and shorten long commutes (SANDAG 2004).

The RCP is the principal planning tool for regional growth, planning, and infrastructure investment. In addition to stating the need for application of smart growth strategies in the siting and development of new housing, the RCP considers housing needs for the region, including housing choices in all price ranges. The RCP states that homes need to be affordable to persons of all income levels and accessible to persons of all ages and abilities.

The RCP also identifies the principal need to promote social equity and environmental justice via implementation of policy goals, objectives, or actions that focus on creating healthy, walkable communities; accessible transportation options; affordable and high-quality housing; maintenance or enhancement of natural areas; adequate buffering for sensitive uses (residential, schools, etc.) from industry and high-traffic corridors; improving living standards; and appropriate siting of energy and waste disposal facilities.

c. General Plan and Housing Element

As discussed in previous chapters of this PEIR, the goal of the General Plan is to provide a long-term strategy to address the City's forecasted population growth and development needs, predominantly through effective and innovative redevelopment and infill. This strategy focuses growth into villages or mixed-use activity centers that are pedestrian friendly, offer a variety of housing types at a range of densities, and are linked to a transit system.

The City's 2013-2020 Housing Element, adopted in March 2013, more specifically analyzes the City's housing needs and identifies potential sites for the provision of additional housing for all segments of the City. The Housing Element is intended to be consistent with and implement the adopted goals of the General Plan. The Housing Element concludes that there is adequate residentially designated land to meet housing needs for the current seven-year cycle; however, it is noted that full realization of the adequate sites inventory cannot be achieved unless there is significant infrastructure investment in the City's communities.(City of San Diego 2013). The Housing Element emphasizes "the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013 - 2020, in a manner consistent with the development pattern of the sustainable communities strategy (scs), that will help meet

regional greenhouse gas targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas." (City of San Diego 2013b).

d. City Inclusionary Affordable Housing Regulations (Land Development Code Section 142.1300)

Consistent with the goals of the Housing Element to ensure the development of sufficient new housing for all income groups and significantly increase the number of affordable housing opportunities, the City adopted an ordinance pertaining to the provision of affordable housing in conjunction with market-rate development (City of San Diego 2013b). The ordinance generally applies to developments of two or more homes, except in the former North City Future Urbanizing Area (NCFUA). This program requires that 10 percent of the total dwelling units in a proposed development shall be affordable to targeted rental households or targeted ownership households, except in the NCFUA, where 20 percent of units must be affordable to specified income levels. This requirement can be met by building on-site or off-site in the same community or through payment of a fee. These fees go into an Inclusionary Housing Trust Fund administered by the Housing Commission, which finances affordable housing development.

In concert with housing shortages, regional housing authorities cite the current and projected lack of affordability of available housing as a major concern in the San Diego region.

A primary goal of the City's Housing Element is to ensure the development of sufficient new housing for all income groups and significantly increase the number of affordable housing opportunities. The City's Housing Element for 2013-2020 includes an introduction titled "San Diego's Affordable Housing Crisis, the Great Recession and the Dissolution of Redevelopment," which notes that "…lack of affordable housing is not only a problem for low-and very low- income residents and for those with special needs, it is also a major problem for a large number of moderate- income working families. Although housing prices have dropped somewhat in recent years due to the economic recession, so too have the number of building permits for housing at all levels of affordability, thus impacting the overall housing inventory." (City of San Diego 2013).

To conform to state law that requires each jurisdiction to meet its fair share of the regional housing need, the City adopted an ordinance pertaining to the provision of affordable housing through inclusionary zoning, as discussed above. Inclusionary housing programs are one method for cities to ensure that units for low- and moderate-income families are built along with market rate units. The City's ordinance is contained within Section 142.1300 et seq. of the LDC. The inclusionary zoning policies are consistent with the goals of the Housing Element to ensure the development of sufficient new housing for all income groups and significantly increase the number of affordable housing opportunities.

To minimize displacement of existing residents as communities redevelop over time, the General Plan contains policies to ensure that planning and development of balanced communities provides opportunities for local citizen involvement with a goal to disperse affordable housing projects throughout the City. These policies also aim to:

- Achieve a balance of incomes in all neighborhoods and communities.
- Provide a variety of housing types, sizes, and prices in residential and village developments.
- Provide affordable housing to offset the displacement of the existing population within the community, striving for balanced commercial development and accessible and equitably distributed social services throughout the City.
- Provide linkages between employment areas, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.
- Include a variety of different land use types in order to provide opportunities for a diverse mix of uses within the community.

As discussed above, residential development within the Northwest District of the planning area has been completed or is planned for future development, consisting of several multi-family dwelling units dispersed throughout the CPU area, thereby adding to the stock of affordable housing.

5.16.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, population and housing impacts would be considered significant if the CPU would:

1. Result in substantial population growth, including growth inducing impacts; or
2. Not be in compliance with the City's Inclusionary Affordable Housing Ordinance.

5.16.3 Issue 1: Population Growth

Would the land use modifications associated with the CPU induce substantial population growth in the area?

5.16.3.1 Impacts

SANDAG population projections prepared for the CPU area indicate that population will increase over time, regardless if the CPU were implemented. To accommodate expected growth, the CPU would redesignate some areas identified in the adopted Community Plan for industrial uses to mixed-use commercial/residential village, institutional uses and

parkland, and would increase density in areas presently designated for very-low to medium density residential uses.

As shown in Table 5.16-3, the CPU projected units and population buildout numbers differ slightly from the SANDAG forecast numbers. The CPU totals represent buildout numbers, with buildout projected to be beyond 2050. The housing unit totals were projected for traffic modeling purposes, and the population projection was derived from the analysis provided in the Community Planning Survey conducted by SourcePoint (City of San Diego 2006b). The CPU proposes an increase of approximately 6,374 residential dwelling units as compared to the adopted community plan and approximately 14,500 additional units above existing units (as of 2012) (SANDAG 2012b). The number of single-family dwelling units would increase under the CPU; however, single-family dwelling units would continue to become a smaller percentage of overall housing in the community. The number of multi-family units would increase by 888-percent (13,033 units) with buildout of the CPU, and the availability of mixed-use housing (Village Areas) also would be substantially increased with buildout of the CPU.

TABLE 5.16-3
RESIDENTIAL BUILDOUT

	Existing[1]	Adopted Community Plan[2]	Proposed CPU
Total Population	15,323	45,136[3]	67,035[4]
Residential Acreage	528[5]	1,269	802
Village Area Acreage (Mixed-use and Residential)[6]	0	0	560
Dwelling Units Total	4,213	12,400	18,774
Single-family	2,745	--	4,273
Multi-family	1,468	--	14,501
Village Area[7]	0	--	11,126

[1]Current Estimates, 2012 (SANDAG 2012b).
[2]As amended in 1997 with the deletion of approximately 5,300 housing units resulting from Multiple Species Conservation Program (MSCP) approval.
[3]Estimate based on number of permitted dwelling units, assuming 3.64 pph (see Section 5.16.1)
[4]Draft CPU, Table 2-5 (City of San Diego 2013a).
[5]SANDAG Land Use Data (SANDAG 2012c).
[6]Acreage within "Neighborhood Village" and "Community Village."
[7]Includes multi-family and single-family units.

Under the CPU, the acreage designated for residential and/or village uses would increase almost three-fold compared to the amount of acreage developed with residential uses in 2012.

The CPU indicates that the Northwest District is mostly developed and is considered as an area with little opportunity for change (City of San Diego 2013a). Upon buildout of the CPU, the anticipated population within this district is 27,908 residents. Based on the housing mix proposed within the Southwest and Central Village areas, estimated population at buildout for these areas of the CPU is 21,028 and 18,099 residents, respectively.

The increase in projected population within the CPU area would be primarily accommodated in multi-family dwelling units rather than single-family housing, thus substantially increasing the intensity of residential development within the CPU area. In this fashion, buildout of the CPU would accommodate the projected population in 2050, as estimated by SANDAG (65,368) (SANDAG 2010b).

Future growth and implementation of the CPU would be supported through ongoing implementation of major programs outlined in the General Plan, which include the following:

- Affordable Housing and Sustainable Buildings Expedite Program (2003), which reduces processing time by up to 50 percent for projects that meet established criteria as affordable/infill projects or sustainable projects; and
- Housing Trust Fund (1990), which utilizes fees collected from nonresidential development to subsidize the construction of affordable housing units.

Buildout of the CPU would require expansion and upgrades to infrastructure, including public services and utilities and transportation/circulation to serve the demands of the increased population. A discussion of impacts to public utilities and services, as well as transportation/circulation, is included in Sections 5.12, 5.13, and 5.14. In addition, implementation of the CPU would provide affordable housing units consistent with the City's objective of increasing the stock of affordable housing, as further discussed under Issue 2, below.

5.16.3.2 Significance of Impacts

Projected population growth, as estimated by SANDAG, would be primarily accommodated in multi-family dwelling units rather than single-family housing, thus substantially increasing the intensity of residential development within the CPU area. While this growth is considered substantial, the CPU would:

- Implement SANDAG's RCP and Regional Housing Element and the City's General Plan and Housing Element by providing a mix of housing types within mixed-use centers linked to public transportation.
- Increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast.
- Focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the RCP and General Plan goals and policies.

As such, the CPU provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist; therefore, impacts would be less than significant.

For a discussion of the growth inducing effects at the CPU, refer to Section 7.0, Growth Inducement.

5.16.3.3 Mitigation Framework

Impacts are less than significant; therefore, no mitigation is required.

5.16.3.4 Significance After Mitigation

Impacts would be less than significant.

5.16.4 Issue 2: Affordable Housing

Would the land use modifications associated with the CPU not comply with the City's Inclusionary Affordable Housing Ordinance?

5.16.4.1 Impacts

The CPU provides opportunities for a variety of housing types catering to a diversity of economic needs including market rate, work force, and affordable housing. The land use designations and design guidelines contained in the CPU are intended to foster the development of housing for all income levels. The CPU indicates that additional affordable housing is needed within the CPU area to "ensure a diverse mixture of incomes and housing" opportunities (City of San Diego 2013a). After recovering the units displaced by the MSCP, the CPU would result in an increase in housing supply over that which had been planned for in 1981. As shown in Table 5.16-3, approximately 77 percent of the residential dwelling units anticipated at buildout of the CPU would consist of multi-family units. A portion of the increase in residential land use would result from increasing densities in the southwestern portion of the CPU area, the only area designated for residential development in the adopted community plan.

According to 2010 Census data, approximately 50 percent of the households' earnings in the CPU area are at or below the median income for the plan area. By allowing for a variety of density ranges and housing types, the CPU would help to facilitate continued affordable housing production. The very-low and low density designations proposed as part of the CPU, at 0–4 and 5–9 du/ac (respectively), would allow development of single-family detached homes. The low-medium density designation, with 10–14 du/ac, would allow development of multi-plex or attached row homes. The medium designation, at 15–29 du/ac, would allow development of garden style multi-family apartments, typically up to three stories in height. The medium-high density residential designation, at 30–44 du/ac and higher, would allow development of high density multi-family apartment or condominium buildings served by structured or podium parking. As such, the CPU would create a more integrated and balanced community than the adopted community plan.

The City's Housing Element includes goals to "ensure the development of sufficient new housing for all income groups" and "provide affordable housing opportunities consistent with a land use pattern, which promotes infill development and socioeconomic equity;" (City of San Diego 2013b). In accordance with the City's Housing Element, the CPU provides appropriate policies to address the community's affordable housing needs. In support of this goal, the CPU includes Land Use Policy 2.1-2.h, which aims to provide a diversity of housing types that includes market rate and affordable housing, as well as encourage inclusionary housing on-site (City of San Diego 2013a). In addition, Policies 2.2-5 through 2.2-8 promote affordable housing through the development of a variety of housing types, as well as promote the production of low and very low income housing in all areas designated for village and residential uses.

While the increase in housing stock as a result of CPU implementation is considered substantial (approximately 14,500 additional units over 2012 stock; 6,400 over the adopted community plan), this growth would implement the housing goals of SANDAG's RCP and Regional Housing Element and the City's General Plan and Housing Element, not only in terms of quantity, but also diversity and location of residentially designated land. These land use modifications associated with the CPU would also be in compliance with the City's Inclusionary Affordable Housing Ordinance. As such, the CPU would provide affordable housing units consistent with federal and state regulations and the City's objective of increasing the stock of affordable housing impacts to affordable housing; therefore, impacts would be less than significant.

5.16.4.2 Significance of Impacts

It is the intent of the CPU to provide affordable housing within the community. In support of this, the land use designations and design guidelines contained in the CPU are intended to foster the development of housing for all income levels. Of the additional units proposed under the CPU, approximately 77 percent of the residential dwelling units anticipated at buildout of the CPU would consist of multi-family units. In addition, implementation of Land Use Policies 2.2-5 through 2.2-8 provide for affordable housing within the community. As such, the CPU would provide affordable housing units consistent with federal and state regulations and the City's objective of increasing the stock of affordable housing impacts to affordable housing; therefore, impacts would be less than significant.

5.16.4.3 Mitigation Framework

Impacts are less than significant; therefore, no mitigation is required.

5.16.4.4 Significance After Mitigation

Impacts would be less than significant.

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5.17 Agricultural and Mineral Resources

This section addresses the potential for impacts to agricultural and mineral resources on or within the vicinity of the CPU area.

5.17.1 Existing Conditions

5.17.1.1 Agriculture

a. Otay Mesa Agriculture

Existing agricultural uses within the CPU are located to the south of Otay Mesa Road between Spring Canyon and La Media Road. Agricultural land in the CPU area occupies approximately 306 acres (see Figure 5.1-1). Most of these agricultural uses are not contiguous, and they are not a primary source of economic vitality in the community. While historically a rural farming community, farmland in the CPU area has steadily declined as a result of urbanization and the rising water and labor costs. Agriculture serves as an interim use pending conversion to nonagricultural uses.

The CPU area contains soils that are of relatively poor quality, as described in more detail below. However, the relatively poor soils are partially compensated by the fact that the CPU area lies within a climate zone which is supportive of most vegetable crops and is especially suited to truck crops and tomatoes, as well as flowers, avocados, and citrus crops.

From a topographic standpoint, the areas most suitable for farming within the CPU area are the Otay riverbed and the mesa area. Temperature differentials, particularly in the canyons and riverbeds, restrict farming of frost-sensitive plants. Most of the cultivated mesa and riverbed areas are either relatively flat or managed so that cropping patterns mitigate temperature hazards.

b. Important Farmland Mapping

The Farmland Mapping and Monitoring Program (FMMP) is implemented by the California Department of Conservation, Division of Land Resource Protection, and recognizes the suitability of land for agricultural production. The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of important farmlands to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local community plan actions, urban needs, changing economic conditions, proximity to market, and other factors which would be taken into consideration when government considers agricultural land use policies. Important Farmland Maps, which are a hybrid of resource quality (soils) and land use

information, are produced by the California Department of Conservation. Agricultural land is rated according to soil quality and irrigation status. The Important Farmland Map Categories are described below.

Prime Farmland. Land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the four years prior to the mapping date.

Farmland of Statewide Importance. Land similar to the Prime Farmland but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. In order to be classified as Farmland of Statewide Importance, the land must have been used for the production of irrigated crops at some time during the four years prior to the mapping date.

Unique Farmland. Land of lesser-quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones of California. In order to be classified as Unique Farmland, the land must have been cropped at some time in the four years prior to the mapping date by the Natural Resources Conservation Service (NRCS).

Farmland of Local Importance. Land of importance to the local agricultural economy, as determined by each county's Board of Supervisors and a local advisory committee. The County of San Diego defines Farmland of Local Importance as land that meets all the characteristics of Prime and Statewide Important farmland, with the exception of irrigation.

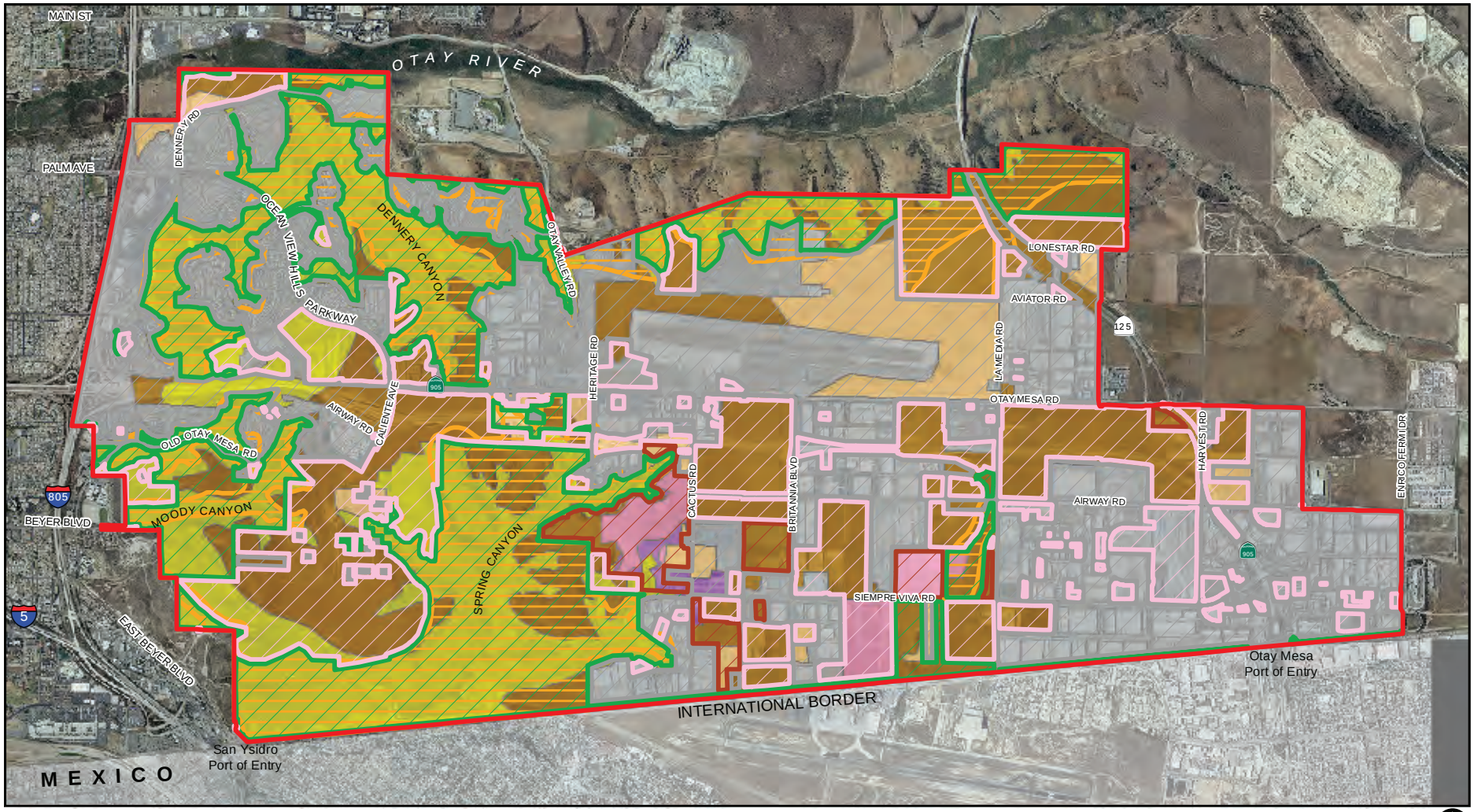
Other Land. Land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

Grazing Land. This category includes land on which the existing vegetation is suited to the grazing of livestock. This category is used only in California and was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension Service, and other groups interested in knowing the extent of grazing activities.

Urban and Built-Up Land. Land occupied by structures with a building density of at least one unit to one and one-half acres, or approximately six structures per 10 acres.

Figure 5.17-1 illustrates the distribution of the Important Farmlands categories within the CPU area as defined by the California Department of Conservation (2008).

Image source: SanGIS (flown May 2012). Data Source: California Department of Conservation, Important Farmland Map Series 2008



Otay Mesa Community Plan Boundary

City of San Diego MHPA

Current Land Use Class

- Developed
- Existing Farmland
- Open Space
- Undeveloped

Farmland Mapping and Monitoring Program Designation (2008)

- Farmland of Local Importance
- Farmland of Statewide Importance
- Grazing Land
- Other Land
- Unique Farmland
- Urban and Built Up Land

0 Feet 4,000

FIGURE 5.17-1

Important Farmland Mapping

Designated Important Farmlands consists of 192 acres of Farmland of Statewide Importance, 48 acres of Unique Farmland, 2,658 acres of Farmland of Local Importance, and 2,354 acres of Grazing Land (Table 5.17-1). There is no Prime Farmland in the CPU area.

While land is designated within these categories, conditions exist that would preclude these areas from agricultural use and portions of these areas have already been developed in a manner that eliminates the agricultural resource potential. More specifically, the majority of the designated Grazing Land and other FMMP Important Farmlands are located within the MHPA. Grazing and agricultural activities are not permitted in these areas. Grading and development (e.g., Dennery Ranch, SR-905, Ocean View Hills) has resulted in soil compaction and cut/fill of areas mapped as Important Farmlands. Since these designations are based on the ability of underlying soil to grow crops, modifications to the soil that affect its ability to be farmed effectively remove it from being considered an agricultural resource.

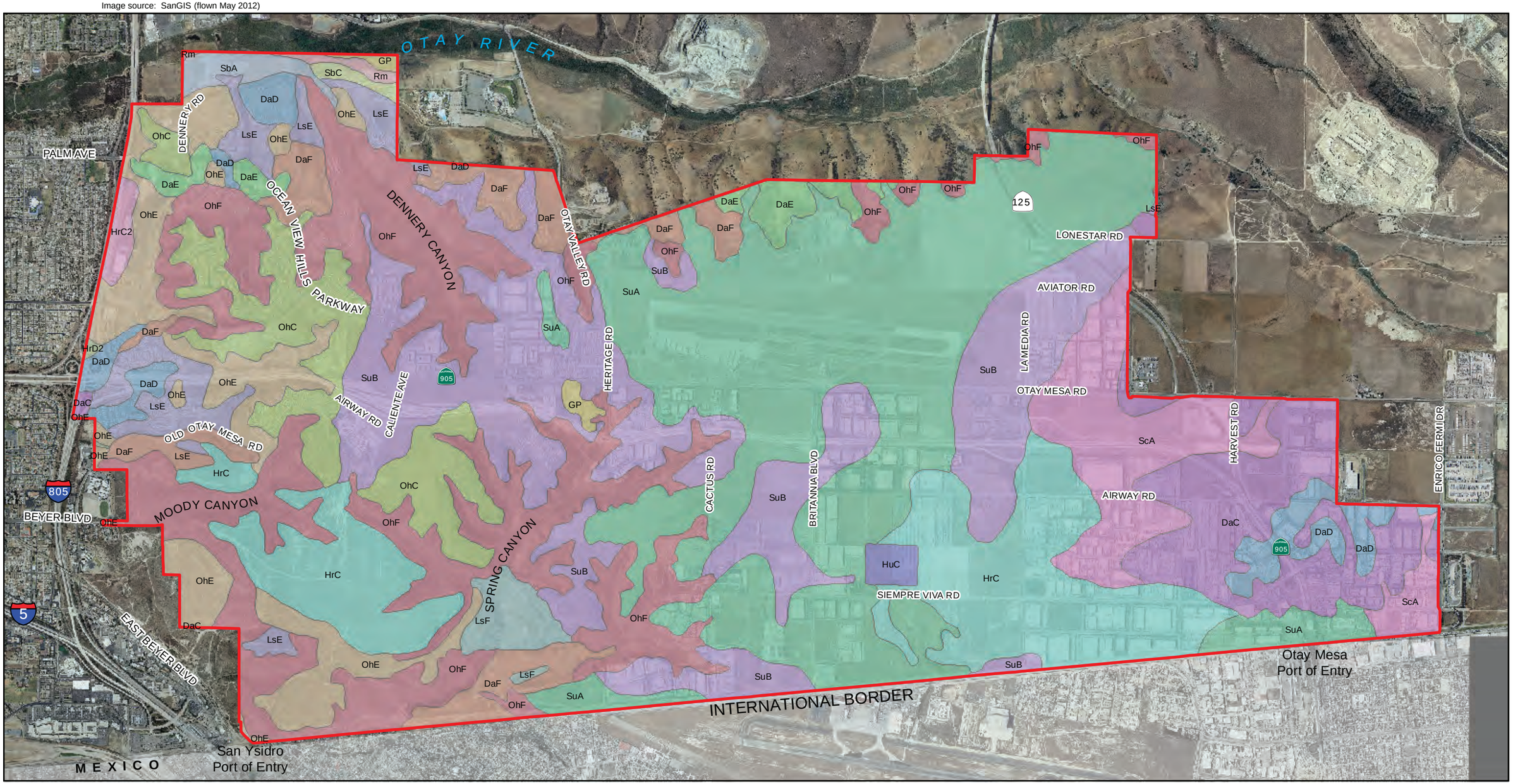
TABLE 5.17-1
IMPORTANT FARMLANDS WITHIN THE CPU AREA

Farmland Category	Total Acres	Open Space	Developed	Existing Farmland in Active Use	Undeveloped
Farmland of Statewide Importance	192	14	2	113	63
Farmland of Local Importance	2,658	691	337	115	1,515
Unique Farmland	48	1	19	28	0
Grazing Land	2,354	1,812	168	17	357
Other Land	541	25	377	33	106
Urban and Built-up Land	3,505	67	3,090	1	347
No Category	5	3	0	0	0
TOTAL	**9,302**	**2,612**	**3,994**	**306**	**2,389**

c. Soil Suitability for Agriculture

The USDA, NRCS developed a system to generally classify soil types and has published a soil survey for the San Diego area. The survey is used to determine the location and extent of the soil types found within the CPU area (listed in Table 5.17-2), which are shown on Figure 5.17-2. The land capability classification describes soil types, their physical characteristics and limitations, and their suitability for agriculture and other uses.

Image source: SanGIS (flown May 2012)



Otay Mesa Community Plan Boundary

Soil Type

- Diablo clay, 15 to 30 percent slopes, DaE
- Diablo clay, 2 to 9 percent slopes, DaC
- Diablo clay, 30 to 50 percent slopes, DaF
- Diablo clay, 9 to 15 percent slopes, DaD
- Gravel pits, GP
- Huerhuero loam, 2 to 9 percent slopes, HrC
- Huerhuero loam, 5 to 9 percent slopes, eroded, HrC2
- Huerhuero loam, 9 to 15 percent slopes, eroded, HrD2
- Huerhuero-Urban land complex, 2 to 9 percent slopes, HuC
- Linne clay loam, 30 to 50 percent slopes, LsF
- Linne clay loam, 9 to 30 percent slopes, LsE
- Olivenhain cobbly loam, 2 to 9 percent slopes, OhC
- Olivenhain cobbly loam, 30 to 50 percent slopes, OhF
- Olivenhain cobbly loam, 9 to 30 percent slopes, OhE
- Riverwash, Rm
- Salinas clay loam, 0 to 2 percent slopes, SbA
- Salinas clay loam, 2 to 9 percent slopes, SbC
- Salinas clay, 0 to 2 percent slopes, ScA
- Stockpen gravelly clay loam, 0 to 2 percent slopes, SuA
- Stockpen gravelly clay loam, 2 to 5 percent slopes, SuB

0 Feet 2,500

FIGURE 5.17-2

Soil Types

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TABLE 5.17-2
CPU SOIL RESOURCES

Soil Type/ Symbol	Soil Description	Number of Acres	% of CPU Area	Storie Index	Storie Index Score
DaC^	Diablo clay, 2 to 9 percent slopes	519	5.7	42	2.388
DaD^	Diablo clay, 9 to 15 percent slopes	214	2.4	37	0.870
DaE	Diablo clay, 15 to 30 percent slopes	115	1.2	30	0.370
DaF	Diablo Clay, 30 to 50 percent slopes	339	3.6	13	0.472
GP	Gravel pits	25	0.3	0	0.000
HrC^	Huerhuero loam, 2 to 9 percent slopes	936	10.0	41	4.117
HrC2^	Huerhuero loam, 5 to 9 percent slopes, eroded	34	0.4	38	0.134
HrD2	Huerhuero loam, 9 to 15 percent slopes, eroded	4	0.0	36	0.016
HuC	Huerhuero-Urban land complex, 2 to 9 percent slopes	31	0.3	0	0.000
LsE	Linne clay loam, 9 to 30 percent slopes	221	2.4	14	0.333
LsF	Linne clay loam, 30 to 50 percent slopes	91	1.0	6	0.058
OhC	Olivenhain cobbly loam, 2 to 9 percent slopes	479	5.1	29	1.489
OhE	Olivenhain cobbly loam, 9 to 30 percent slopes	534	5.7	20	1.146
OhF	Olivenhain cobbly loam, 30 to 50 percent slopes	1,520	16.3	10	1.628
Rm	Riverwash	18	0.2	1	0.002
ScA*	Salinas clay, 0 to 2 percent slopes	470	5.1	73	3.725
SbA*	Salinas clay loam, 0 to 2 percent slopes	53	0.6	81	0.463
SbC*	Salinas clay loam, 2 to 9 percent slopes	18	0.3	62	0.121
SuA^	Stockpen gravelly clay loam, 0 to 2 percent slopes	2,179	23.3	36	8.388
SuB^	Stockpen gravelly clay loam, 2 to 5 percent slopes	1,502	16.1	34	5.441
TOTAL		**9,302**	**100**	**----**	**31.16**

^Farmland of Statewide Importance Soil.
*Prime Farmland Soil.

One of the most commonly used ways to classify the value of agricultural soils is the Storie Index, which expresses numerically the relative degree of suitability and grade of a soil for intensive agriculture based on soil characteristics. Soils of grade 1 (i.e., with a Storie Index of 80 to 100) have few or no limitations restricting their use for crops, whereas at the other end of the scale, grade 6 (i.e., index rating of less than 10) consists of soils that generally are not suited to farming. Table 5.17-2 lists the acreage of the soils found within the CPU area along with each soil's corresponding Storie Index. An overall Storie Index score for the CPU area can be determined by taking the Storie index score multiplied by the percentage of the site that contains each soil type, then summing the scores. The overall Storie Index score for the CPU area is 31.16 (maximum score is 100), which means that the overall soil quality is relatively poor.

The California Department of Conservation maintains a soil candidate listing for prime agricultural soils (this term is not synonymous with Prime Farmland). Within the CPU area, the Salinas series of soils (ScA, SbA, and SbC) are listed as being prime soils for San Diego County. As listed in Table 5.17-2, there are 541 acres (6 percent of the CPU area) of prime soils within the CPU area. The majority of the prime soils and soils of statewide importance are located within the central and southeastern portions of the CPU area, which are significantly built out or limited by airport uses.

d. Regulatory Framework

California Land Conservation (Williamson) Act

The California Land Conservation Act of 1965, also referred to as the Williamson Act, is an agricultural protection program that currently protects more than 16 million of the state's 30 million acres of farm and ranch land. Under the act, a private landowner may voluntarily enter into a rolling term 10-year contract with the local government for the purpose of restricting specific parcels of land to agricultural or compatible open space use. Lands must be located within an agricultural preserve area and be a minimum of 100 acres in size unless a smaller size is authorized by the local government. There are no active Williamson Act contracts or properties within the CPU area.

Right-to-Farm Act

California Civil Code §3482.5, "The Right to Farm Act" or California Agricultural Protection Act provides, among other measures, that:

> No agricultural activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than three years if it was not a nuisance at the time it began.

The act shall prevail over any contrary provision of any ordinance or regulation of any city, county, or other political subdivision of the state but may be amended by the local governing jurisdiction, to provide for notification to prospective homeowners who may be affected by agricultural operations in close proximity. Although agriculture is listed as an interim use within the CPU area, the Right-to-Farm Act would still be applicable for all existing agricultural operations.

City of San Diego Land Development Code

Only two zones in the City allow for agricultural use by right; Open Space-Residential (OR-1-2) and Open Space-Floodplain (OF). The CPU area includes the OF zone along the Otay River Valley. No OR-1-2 zone exists within the CPU area. The area along the Otay River Valley is not currently in agricultural use and would not be viable for agricultural use considering the site conditions and proximity to residences.

Adopted Otay Mesa Community Plan

The 1981 Community Plan identified that approximately 3,900 acres within the CPU area were under cultivation. Agricultural use is allowed by the adopted community plan on an

interim basis only. The adopted Otay Mesa Community Plan contains one objective pertaining to agriculture: "to retain agriculture until development is warranted." Development in accordance with the adopted land uses would result in the elimination of agricultural activities in Otay Mesa.

5.17.1.2 Mineral Resources

a. State of California

Since mineral resources including sand and gravel have been and continue to be vital to California's economy, the state adopted the Surface Mining and Reclamation Act (SMARA) of 1975 and developed a number of programs to ensure the long-term availability of mineral resources to the people of the state and nation.

California Department of Conservation

The California Department of Conservation provides services and information that promote environmental health, economic vitality, informed land use decisions, and sound management of the state's mineral resources. The California Department of Conservation includes the California Geological Survey (CGS) (formerly Division of Mines and Geology), State Mines and Geology Board (SMGB), and Office of Mine Reclamation (OMR), which together provide information and oversight for the varied mining resources and permitted mining operations within the state.

As part of the classification process, the CGS established a "Production-Consumption" (P-C) Region in western San Diego County. The P-C Region includes the areas of highest population and urbanization in western San Diego County and defines the resources therein.

Within the P-C Region, Mineral Resource Zones (MRZs) are identified. In conformance with guidelines set forth in SMARA and the related "Guidelines for Classification and Designation of Mineral Lands," areas are categorized into four MRZs for the region's aggregate resources only. The following is a definition of the zones as presented in Special Report 153 (State of California 1982) with additional discussion of significant mineral deposit resources that occur within the CPU area:

MRZ-1 Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence.

MRZ-2 Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that there is a high likelihood for their presence. MRZ-2 areas are made up of four types of deposits which lie within the western San Diego County Region. These are Quaternary river channel and floodplain

deposits, Tertiary and Quaternary conglomerate and alluvial fans, Cretaceous granitic rocks, and Jurassic metavolcanic rocks.

MRZ-3 Areas containing mineral deposits, the significance of which cannot be evaluated from available data.

MRZ-4 Areas where available information is inadequate for assignment to any other MRZ zone.

Of the four categories discussed above, lands classified as MRZ-2 are of the greatest importance because significant mineral resources underlie them. Of the mineral resources identified within MRZ-2, the most economically valuable to the state and San Diego region is by far the mining of sand, gravel, and crushed rock resources. These resources are known collectively as construction aggregate. Construction aggregate is important to the local construction industry for use in concrete (especially PCC-grade aggregate), fill, road base, and building materials.

b. CPU Area

The entire CPU area is classified as either MRZ-2 or MRZ-3, which includes lands of "identified mineral resource significance" and those containing mineral deposits that have not been adequately tested to determine the significance of the materials present, respectively. MRZ-2 lands exist within the northwest portion of the CPU area along the Otay River and consist of approximately 330 acres. MRZ-3 lands exist within all remaining portions of the CPU area and comprise approximately 9,000 acres.

5.17.2 Significance Determination Thresholds

Based on the City's CEQA Significance Thresholds, impacts related to agricultural and mineral resources would be significant if the CPU would:

1. Convert a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

2. Change the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.

3. Result in the loss of availability of a significant mineral resource (e.g., sand or gravel) as identified in the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey.

5.17.3 Issue 1: Conversion of Agricultural Land

Would the land use modifications associated with the CPU result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

5.17.3.1 Impacts

Buildout of the CPU would eventually eliminate all agricultural activity that occurs within the CPU area. This includes the 306 acres of active farmland located in the area between Spring Canyon and La Media Road. It should be noted that, as described in Section 3.5, the Central Village would be rezoned to an agricultural zone. The agricultural zone would be used as a "holding zone" until greater specificity is proposed by the property owners within the Specific Plan area per the Land Use Element of the CPU. It is anticipated that agricultural operations on the 306 acres of active farmland would continue to be viable in the near-term under the holding zone designation, but are considered to be permanently converted under the long-term buildout of the CPU.

As of December 2013, the most currently available FMMP data is from 2010. Therefore, some lands, which have been developed with non-agricultural uses, are still designated as Important Farmland (see Table 5.17-2). As shown in Table 5.17-3, additional lands currently designated as Important Farmland would be converted as a result of the CPU. CPU impacts would include the additional conversion of 180 acres of Farmland of Statewide Importance, 28 acres of Unique Farmland, 1,489 acres of Farmland of Local Importance, and 295 acres of Grazing Land.

TABLE 5.17-3
CPU IMPACTS TO IMPORTANT FARMLANDS

Farmland Category	Total Acres	Proposed Open Space	Existing Developed Areas	CPU Impacts
Prime Farmland	0	0	0	0
Farmland of Statewide Importance	192	10	2	180
Farmland of Local Importance	2,658	851	337	1,489
Unique Farmland	48	1	19	28
Grazing Land	2,354	1,892	168	295
Other Land	541	20	377	139
Urban and Built-up Land	3,505	58	3,090	344
No Category	4	1	0	0
TOTAL	**9,302**	**2,833**	**3,994**	**2,475**

As shown in Figure 5.17-1, the existing areas mapped as Important Farmland are not contiguous and are surrounded by urban land uses and MHPA lands. This condition, combined with the high cost of water, has impacted the viability of agricultural uses in the CPU area.

5.17.3.2 Significance of Impacts

Although the CPU would convert additional Important Farmland to non-agricultural uses, these areas are fragmented and are surrounded by urban land uses and MHPA lands. Rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts have contributed to a significant reduction in future agricultural viability within the CPU area. Furthermore, agricultural land in the CPU area is intended as an interim, rather than permanent use. The CPU allows agriculture as an interim use pending development and would rezone the Central Village to an agricultural "holding" zone to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to non-agricultural uses would be less than significant.

5.17.3.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation would be required.

5.17.3.4 Significance After Mitigation

Impacts would be less than significant.

5.17.4 Issue 2: City and Regional Consequences of Agricultural Land Conversion

Would the CPU result in changes to the existing environment, which due to their location or nature, could result in the conversion of farmland to non-agricultural use?

5.17.4.1 Impacts

Existing agricultural uses occur sporadically throughout the CPU area. Of the 3,900 acres listed in the 1981 Community Plan designated to be retained as agriculture until development is warranted, 306 acres mapped as active agricultural land remain (SANDAG 2009). This would represent only a tenth of one percent (0.1 percent) of the total acreage under cultivation within the County. As such, conversion would not be significant in terms of countywide agricultural value. Because these acres are such a small portion of the regional agricultural production and have limited agricultural viability, impacts would be less than significant.

5.17.4.2 Significance of Impacts

The CPU would result in the conversion of all the existing agriculture in the CPU area. However, viability of this area for agricultural use is limited, and the amount of existing farmland is minimal relative to the regional total. Thus, implementation of the CPU would have a less than significant regional impact to agriculture.

5.17.4.3 Mitigation, Monitoring, and Reporting

Impacts would be less than significant; therefore, no mitigation would be required.

5.17.4.4 Significance After Mitigation

Impacts would be less than significant.

5.17.5 Issue 3: Mineral Resources

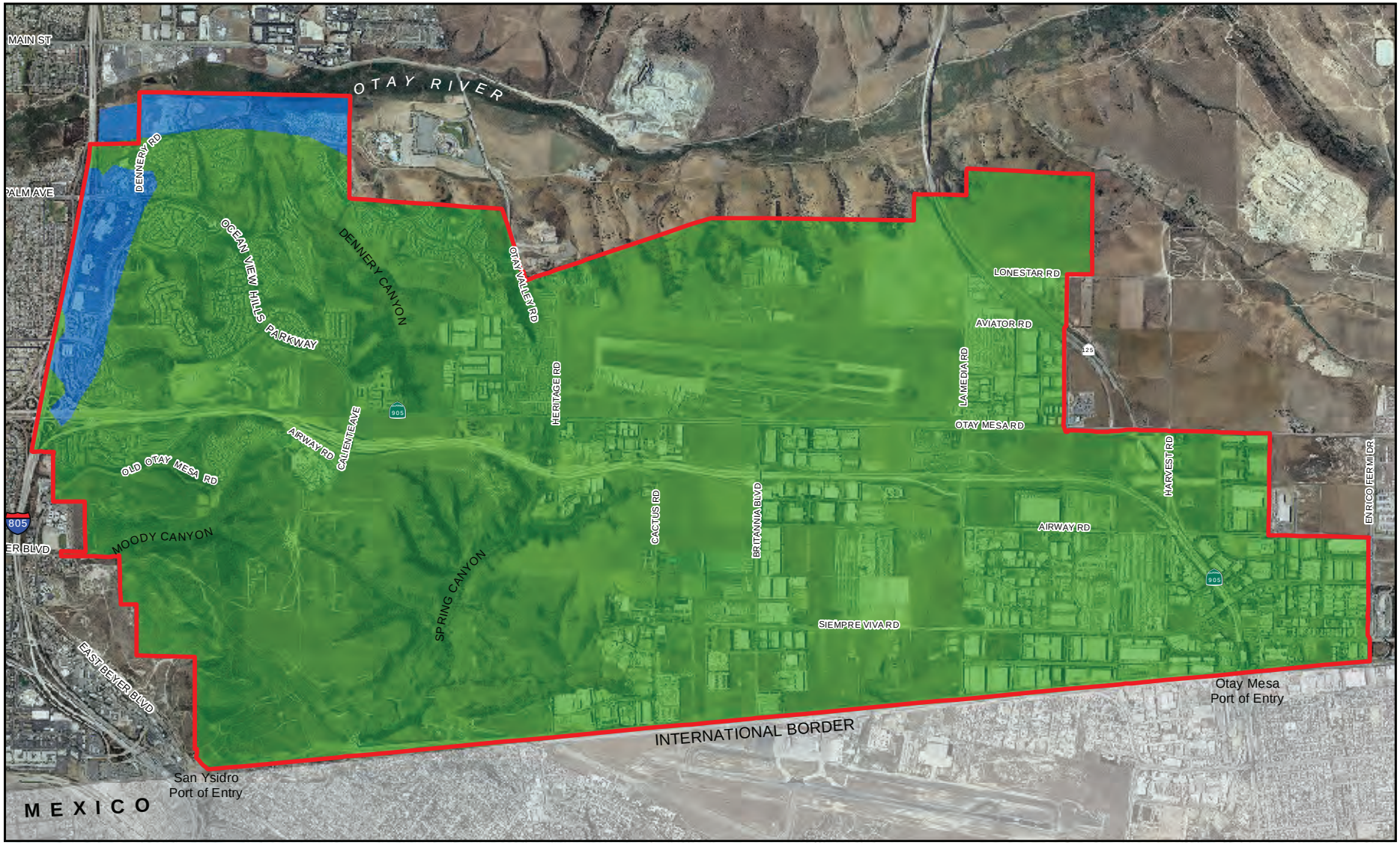
Would implementation of the CPU result in the loss of availability or prevention of future extraction of sand or gravel, and/or mineral resources as identified in the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey?

5.17.5.1 Impacts

The loss of access to mineral resources would primarily be the result of the conversion of lands underlain by these resources, or within close proximity to the resources such that future projects would restrict or eliminate safe and environmentally sound measures to implement extractive operations.

There are 353 acres of MRZ-2 “regionally significant” aggregate resource areas within the CPU area (Figure 5.17-3) which exist within the northwestern portion of the CPU area where development currently exists or where entitlements have already been approved for future development. Therefore, access to these areas of significant aggregate is already restricted, which precludes the likelihood of extraction of those resources. Furthermore, the surrounding residential and commercial development in close proximity to this area would not be compatible with the extraction processes. Objectionable characteristics that accompany this process include noise, vibration, air pollution, dust, heavy trucks causing traffic congestion, and often significant visual impacts. Additionally, as described in Section 5.17.1.2, above, the remainder of the CPU area is classified as MRZ-3, which is not considered a significant mineral resource pursuant to the City of San Diego’s Significance Determination Thresholds.

Image source: SanGIS (flown May 2012)



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Otay Mesa Community Plan Boundary

Mineral Resource Zones

Zone 2 (Regionally Significant)

Zone 3

FIGURE 5.17-3

Mineral Resources

No mining activities are currently occurring within the CPU area. However, a concrete batch plant is currently operating within the CPU and is not considered a formal mining activity. The Hanson Aggregates Otay Ranch Pit is located off-site, approximately three-quarters of a mile to the north of the CPU boundary and north of the Otay River Valley. Because of the distance and its location north of the river, there would be no indirect impacts to off-site mining activities as a result of the CPU implementation.

5.17.5.2 Significance of Impacts

Portions of the CPU area where 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. No mining activities are currently present within the CPU area and development would not have any indirect impacts to extraction operations in the vicinity. MRZ-3 mineral resources are not considered a significant mineral resource. As such, the ability to extract mineral resources would not be impacted with the adoption of the CPU.

5.17.5.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.17.5.4 Significance After Mitigation

Impacts would be less than significant.

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5.18 Greenhouse Gas Emissions

The following greenhouse gas emissions analysis is based on the Greenhouse Gas Emissions Analysis prepared by RECON in February 2013. The complete analysis is included as Appendix N.

5.18.1 Existing Conditions

5.18.1.1 Greenhouse Gas Inventories

a. Statewide GHG Emissions

Statewide GHG inventories performed by the California Air Resources Board (CARB) over the past two decades report that statewide GHG emissions totaled 433 million metric tons of carbon dioxide equivalent emissions ($MMTCO_2E$) in 1990, 458 $MMTCO_2E$ in 2000, 484 $MMTCO_2E$ in 2004, and 478 $MMTCO_2E$ in 2008 (CARB 2010b). Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

b. Plan Area GHG Emissions

The CPU area is currently a source of anthropogenic GHGs, with emissions generated by vehicular traffic and by the energy use, water use, and solid waste disposal practices of the existing buildings. Quantification of the existing GHG emissions from CPU area land uses and associated traffic was performed using the California Emissions Estimator Model (CalEEMod), which was released in March 2011 (SCAQMD 2011).

The results of the CalEEMod analysis indicate that the existing CPU area land uses are currently generating approximately 2,611,312 $MTCO_2E$ annually as shown in Table 5.18-1 below.

TABLE 5.18-1
CPU AREA GHG EMISSIONS IN 2012
($MTCO_2E$ PER YEAR)

Emission Source	Existing GHG Emissions
Vehicles	612,398
Energy Use	195,730
Area Sources	0
Water Use	916,242
Solid Waste Disposal	886,942
TOTAL	**2,611,312**

$MTCO_2E$ = metric tons of carbon dioxide equivalent emissions

5.18.1.2 Consequences of Global Climate Change

The potential consequences of global climate change on the San Diego region are far reaching. The Climate Scenarios Analysis Report, published in 2006 by the California Climate Change Center, predicts that throughout the state and the region, global climate and local microclimate changes could cause an increase in extreme heat days; higher concentrations, frequency, and duration of air pollutants; an increase in wildfires; more intense coastal storms; sea level rise; impacts to water supply and water quality through reduced snowpack and saltwater influx; public health impacts; impacts to near-shore marine ecosystems; reduced quantity and quality of agricultural products; pest population increases; and altered natural ecosystems and biodiversity.

CARB projected a future statewide GHG emissions increase of more than 23 percent (from 2004) by 2020 given Business as Usual (BAU) trends (CARB 2008a). BAU emissions are the GHG emissions that would be expected to occur in the absence of GHG-reduction measures (including local and state regulations) or mitigation. Year 2020 estimates of California's GHG emissions have been updated to account for new estimates for future fuel and energy demand as well as other factors including the economic downturn. More recent estimates predict a future statewide emissions increase of approximately 7 percent (from 2008) by 2020 given current trends (CARB 2012). The 2008 Energy Policy Initiative Center (EPIC) study predicted a countywide increase to 43 $MMTCO_2E$, or roughly 20 percent (from 2006) by 2020, given a BAU trajectory. Updated estimates are not available, but would be less than 20 percent for the same reasons.

5.18.1.3 Existing Regulatory Framework

Local and state regulatory plans aim to reduce state and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. These plans' goals and regulatory standards are thus largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles vehicles traveled (VMT) through land use change and infrastructure investments. The types of land use changes that can measurably reduce GHG emissions associated with vehicle use include: increased density; increased diversity (mixed-use); improved walkability design; improved transit accessibility; transit improvements; integration of below market-rate housing; and constrained parking.

By increasing density, especially within proximity of transit, travel distances are affected and greater options for the mode of travel they choose are provided. This can result in a substantial reduction in VMT depending on the change in density compared to a typical suburban residential density (California Air Pollution Control Officers Association [CAPCOA]

2010). By increasing transit accessibility and locating a high-density project near transit for example, a shift in travel mode is facilitated along with reduced VMT.

Constraining parking supply, either through policy changes (e.g., reduced parking requirements for urban areas) or through pricing, and/or preferential parking for ridesharing and fuel-efficient vehicles, can also result in a decrease in VMT, as motorists shift away from single-occupancy vehicle travel and carpool, and rely more on transit or elect to walk or bicycle instead. The effectiveness of these land use strategies ranges from less than one percent up to a maximum 30 percent reduction in communitywide VMT (CAPCOA 2010).

For the energy sector, the reduction strategies of local, state, and national plans aim to reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; and expand research and development. At the project-level, policies or incentive programs for builders to exceed the current Title 24 energy efficiency standards, install high-efficiency lighting, and energy-efficient plug-in appliances (for energy users not subject to Title 24), and to incorporate on-site renewable energy generation, can result in substantial GHG emissions reductions, up to 35 percent or more.

Energy use associated with water consumption and wastewater treatment can also be reduced by applying an overall water reduction strategy (e.g., of 20 percent on indoor and outdoor water use) and/or policies and actions related to using reclaimed and gray water, installation of low-flow plumbing fixtures, the use of water-efficient landscape design, including turf reduction and use of water-efficient irrigation systems. The institution of recycling and composting services can also reduce the energy embodied in the disposal of solid waste.

In addition to strategies aimed at reducing GHG emissions associated with vehicle and energy use, relevant local and state plans include GHG reduction strategies aimed at reducing the heat island effect through urban forestry and shade tree programs, and therefore energy-for-cooling demand. GHG reduction strategies also reduce area source emissions from woodstoves and fireplaces through stricter restrictions on fuel type and use, as well as landscaping equipment, such as use of only electric-powered lawn mowers, leaf blowers, and chain saws.

Climate adaptation, which generally acknowledges that GHG emissions cannot fully be avoided and that climate change is occurring over time, includes policies and strategies to increase climate adaptability and resilience through climate-sensitive building guidelines (e.g., through appropriate building orientation and glazing design), sea-level monitoring, and defensible building design.

There are numerous plans, policies, and regulations aimed at reducing GHG emissions. They exist at the international level, national, state and local levels. The discussion below is

focused on the key state and local regulations affecting GHG emissions analyses of land development projects. Greater detail on these and other GHG-related regulations, including international and national regulations, is provided in the GHG technical report (Appendix N).

a. State

EO S-3-05—Statewide GHG Emission Targets

This 2005 executive order (EO) established the following GHG emission reduction targets for the state of California:

- by 2010, reduce GHG emissions to 2000 levels;
- by 2020 reduce GHG emissions to 1990 levels;
- by 2050 reduce GHG emissions to 80 percent below 1990 levels.

It also directed the secretary of the California EPA (CalEPA) to oversee efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets, on the impacts to the state related to global warming, and on mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006 and has been updated every two years.

AB 32—California Global Warming Solutions Act

In response to EO S-3-05, the California legislature passed AB 32, the "California Global Warming Solutions Act of 2006." It required CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. It also required CARB to adopt a plan indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

As directed, in December 2007 CARB approved a 2020 emission limit of 427 $MMTCO_2E$; and the following year completed a Climate Change Scoping Plan (Scoping Plan).

Climate Change Scoping Plan

The Scoping Plan includes strategies and reduction measures to reduce statewide GHG emissions to 1990 levels by 2020. The reduction measures would achieve an approximate 174 $MMTCO_2E$ reduction in GHG emissions, for approximately 29 percent less than the state's projected 2020 emission level of 596 $MMTCO_2E$ under a BAU scenario. CARB will update the Scoping Plan at least once every five years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

Table 5.18-2 summarizes the reduction measures CARB identified as necessary to reduce forecasted BAU 2020 emissions to target levels. As indicated in Table 5.18-2, the majority of reductions is directed at the sectors with the largest GHG emissions contributions—transportation and electricity generation—and involve statutory mandates affecting vehicle

or fuel manufacture, public transit, and public utilities. To address emissions from vehicles, CARB is proposing a comprehensive three-prong strategy: reducing GHG emissions from vehicles, reducing the carbon content of the fuel these vehicles burn, and reducing the miles these vehicles travel.

To address emissions from energy use, the Scoping Plan includes enhanced energy-efficiency programs that provide incentives for customers to purchase and install more efficient products; building and appliance standards to ensure that manufacturers and builders bring improved products to market; and renewable energy mandates for public utilities. Over the long-term, the recommended measures will increase the amount of electricity from renewable energy sources and improve the energy efficiency of industries, homes, and buildings. While energy efficiency would account for the largest GHG reductions, other applicable land development measures such as water conservation and waste reduction would achieve additional energy emissions reduction.

Several Scoping Plan measures have been adopted as mandatory requirements in statewide regulations. The ones of most relevance to this analysis include the Pavley GHG Vehicle Standards, the Low Carbon Fuel Standards, and the Renewables Portfolio Standard.

TABLE 5.18-2
CARB SCOPING PLAN-RECOMMENDED GHG REDUCTION MEASURES

Recommended Reduction Measures	Reductions Counted Towards 2020 Target In $MMTCO_2E$ (% total) [2]
ESTIMATED REDUCTIONS RESULTING FROM THE COMBINATION OF CAPPED SECTORS AND COMPLEMENTARY MEASURES	**146.7**
California Light-Duty Vehicle Greenhouse Gas Standards • Implement Pavley Standards • Develop Pavley II light-duty vehicle standards	31.7 (22%)
Energy Efficiency • Building/appliance efficiency, new programs, etc. • Increase CHP generation by 30,000 GWh • Solar Water Heating (AB 1470 goal)	26.3 (18%)
Renewables Portfolio Standard (RPS) (33% by 2020)	21.3 (14%)
Low Carbon Fuel Standard	15 (10%)
Regional Transportation-related GHG Targets[1]	5 (4%)
Vehicle Efficiency Measures	4.5 (3%)
Goods Movement • Ship Electrification at Ports • System-Wide Efficiency Improvements	3.7 (3%)
Million Solar Roofs	2.1 (2%)
Medium/Heavy Duty Trucks • Heavy-Duty Vehicle Greenhouse Gas Emissions Reduction (Aerodynamic Efficiency) • Medium- and Heavy-Duty Vehicle Hybridization	1.4 (<1%)
High Speed Rail	1.0 (<1%)
Industrial Measures (for sources covered under cap & trade program) • Refinery Measures • Energy Efficiency and Co-Benefits Audits	0.3 (<.5%)
Additional Reductions Necessary to Achieve the Cap	34.4 (23%)
ESTIMATED REDUCTIONS RESULTING FROM UNCAPPED SECTORS	**27.3**
Industrial Measures (for sources not covered under cap & trade program) • Oil and Gas Extraction and Transmission	1.1
High Global Warming Potential Gas Measures	20.2
Sustainable Forests	5.0
Recycling and Waste (landfill methane capture)	1.0
TOTAL REDUCTIONS COUNTED TOWARDS 2020 TARGET	**174**[3]

SOURCE: Table 2 of CARB 2008b.

[1] This number represents an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target. CARB will establish regional targets for each Metropolitan Planning Organization following input of the Regional Targets Advisory Committee and a public stakeholders consultation process per SB 375.

[2] Percentages are relative to the capped sector subtotal of 146.7 $MMTCO_2E$, and may not total 100 due to rounding.

[3] The total reduction for the recommended measures slightly exceeds the 189 MMTCO2E of reductions estimated in the BAU 2020 Emissions Forecast. This is the net effect of adding several measures and adjusting the emissions reduction estimates for some other measures.

AB 1493—Pavley GHG Vehicle Standards

AB 1493 (Pavley) enacted July 2002, directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year. However, due to a lawsuit by the Alliance of Automobile Manufacturers, their eventual implementation did not get authority until June 2009. These regulations were expected to reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and are further expected to reduce emissions by about 30 percent in 2018 (CARB 2010c) for a total reduction of 31.7 $MMTCO_2E$ counted toward the total statewide reduction target (CARB 2008b) (see Table 5.18-2). These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives.

CARB has adopted a second, more stringent, phase of the Pavley regulations, termed "Pavley II" [now known as "Low Emission Vehicle III GHG"], that covers Model Years 2017 to 2025. Pavley II was estimated in 2008 to add an additional reduction of 4.0 $MMTCO_2E$ for 2 percent of the estimated 174 $MMTCO_2E$ reduction total.

EO S-01-07—Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS) is the means by which the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by 2020. CARB adopted the LCFS as a discrete early action measure pursuant to AB 32 in April 2009. The LCFS is a performance standard with flexible compliance mechanisms intended to incentivize the development of a diverse set of clean, low-carbon transportation fuel options. Its aim is to accelerate the availability and diversity of low-carbon fuels such as biofuels, electricity, and hydrogen, by taking into consideration the full life-cycle of GHG emissions. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 18.5 $MMTCO_2E$ in 2020. However, in order to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 $MMTCO_2E$ (CARB 2008b).

Renewables Portfolio Standard

The Renewables Portfolio Standard (RPS) promotes diversification of the state's electricity supply. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020, the goal has been accelerated and increased; most recently by EO S-14-08 and EO S-21-09 to a goal of 33 percent by 2020. Its purpose is to achieve a 33 percent renewable energy mix statewide, where 33 percent of the state's electricity needs would be met by renewable energy sources by 2020 (CARB 2008b). Increasing the RPS to 33 percent is meant to accelerate the transformation of the electricity sector, through investment in the transmission infrastructure and systems changes to allow integration of large quantities of intermittent wind and solar generation. Renewable energy includes (but is

not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Increased use of renewables would decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector. CARB estimates that full achievement of the RPS would decrease statewide GHG emissions by 21.3 $MMTCO_2E$ (CARB 2008b).

SB 375—Regional Emissions Targets

SB 375 was signed in September 2008 requiring CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Regional Transportation-Related GHG Target Scoping Plan measure. Its purpose is to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation in order to reduce GHG emissions by promoting high-density, mixed-use developments around mass transit hubs.

CARB, in consultation with the state's Metropolitan Planning Organizations (MPOs), was required to provide each affected region with passenger vehicle GHG emissions reduction targets for 2020 and 2035. The San Diego region will be required to reduce GHG emissions from cars and light trucks 7 percent per capita by 2020 and 13 percent by 2035 (SANDAG 2011). The reduction targets are to be updated every eight years, but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets.

Once reduction targets are established, each of California's MPOs must prepare and adopt a SCS that demonstrates how the region will meet its greenhouse gas reduction targets through integrated land use, housing, and transportation planning. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in the SCS. After the SCS is adopted by the MPO, the SCS will be incorporated into that region's federally enforceable RTP.

San Diego's MPO, SANDAG, completed and adopted its 2050 RTP in October 2011, the first such plan in the state that included a SCS (SANDAG 2011). In December 2012, the Superior Court ruled that SANDAG violated state law by failing to fully account for, and take steps to reduce, climate pollution in its environmental review of the RTP. It should be noted that as of the printing of this PEIR, the PEIR prepared for the RTP and SCS is the subject of ongoing litigation.

b. Local

San Diego Sustainable Community Program/Cities for Climate Protection

In 2002, the City Council approved the San Diego Sustainable Community Program (SCP) and requested that an advisory committee be established to provide recommendations that would decrease GHG emissions from City operations. The City subsequently became a

participant in the International Council for Local Environmental Initiatives (ICLEI) Cities for Climate Protection (CCP) Campaign to reduce GHG emissions, and in the California Climate Action Registry.

As a participant in the ICLEI CCP program, the City made a commitment to voluntarily decrease its GHG emissions by 2030 through a series of five milestones: (1) establish a CCP campaign, (2) engage the community to participate, (3) sign the U.S. Mayors Climate Protection Agreement, (4) take initial solution steps, and (5) perform a GHG audit. The City has advanced past Milestone 3 by signing the Mayor's agreement and establishing actions to decrease City Operations' emissions.

Climate Protection Action Plan

In July 2005, the City developed a Climate Protection Action Plan (CPAP) that identifies policies and actions to decrease GHG emissions from City operations. Recommendations included in CPAP for transportation included measures such as increasing carpooling and transit ridership, improving bicycle lanes, and converting the City vehicle fleet to low-emission or non-fossil-fueled vehicles. Recommendations in the CPAP for energy and other non-transportation emissions reductions included increasing building energy efficiency (i.e., requiring that all new City projects achieve the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver standard); reducing waste from City operations; continuing use of landfill methane as an energy source; reducing the urban heat island by avoiding dark roofs and roads which absorb and retain heat; and increasing shade tree and other vegetative cover plantings.

Because of City actions implemented earlier between 1990 and 2002, moderate GHG emissions reductions were reported in the CPAP. City actions taken to capture methane gas from solid waste landfills and sewage treatment plants resulted in the largest decrease in GHG emissions. Actions taken thus far to incorporate energy efficiency and alternative renewable energy reached only 5 percent of the City's 2010 goal. The transportation sector remains a significant source of GHG emissions in 2010 and has had the lowest GHG reductions, reaching only 2.2 percent of the goal for 2010. The recently amended City General Plan includes a Policy CE-A.13 to regularly monitor and update the CPAP.

Sustainable Building Policies

In several of its policies, the City aims to reduce GHG emissions by requiring sustainable development practices in City operations and incentivizing sustainable development practices in private development (see Council Policy (CP) 900-14—Sustainable Building Policy, adopted in 1997 and updated in 2010, CP 900-16—Community Energy Partnership, adopted in 2000, and the updated CP 600-27—Sustainable Buildings Expedite Program, last revised in 2003). The City has established a mandate for all City projects to achieve LEED Silver for all new buildings and major renovations over 5,000 square feet. Incentives

are also provided to private developers through the Expedite Program, which expedites project review of green building projects and discounts project review fees.

The City has also enacted codes and policies aimed at helping the City achieve the state's 75 percent waste diversion mandate, including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (O-19678 Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition Debris Deposit Ordinance (0-19420 & 0-19694 Municipal Code Chapter 6, Article 6, Division 6).

General Plan

The General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the Programmatic EIR prepared for the General Plan in 2008. A Programmatic EIR Mitigation Framework specifies that "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans and regulations), project-specific measures will [need to] be identified with the goal of reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists."

Climate Mitigation and Adaptation Plan

A citywide draft Climate Mitigation and Adaptation Plan (CMAP)~~, dated~~ was developed in August ~~28,~~ 2012~~, has been developed~~ to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan at a program- level. This document, now called the Climate Action Plan (CAP) has been revised to include 2035 targets that are on the trajectory for meeting the 2050 GHG reduction goals established by Executive Order S-3-05. The draft CAP was released for public review on December 3, 2013. The draft C~~M~~AP elements have been prepared pursuant to guidance from the amended CEQA Guidelines and CARB recommendations for what constitutes an effective GHG reduction plan.

~~The City's draft CMAP establishes a planning horizon of 2013 through 2035 and quantifies GHG emissions, establishes GHG reduction targets for 2020, 2035, and 2050, identifies strategies and measures to reduce GHG emissions, and provides guidance for monitoring progress on an annual basis.~~

5.18.2 Significance Determination Thresholds

The CEQA Guidelines Appendix G Environmental Checklist includes the following two questions regarding assessment of GHG emissions:

1. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?

2. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

As stated in the Guidelines, these questions are "intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance." The City has not adopted its own GHG Thresholds of Significance for CEQA and is following guidance from the 2008 CAPCOA report "CEQA & Climate Change," to identify screening criteria to determine when a GHG analysis would be required; and information from the CARB Scoping Plan and BAU 2020 Forecast to determine when a cumulatively significant contribution of GHGs has occurred.

The CAPCOA report references a 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. The City, thus, chose a 900-metric-ton screening criterion for determining when a GHG analysis would be required (Table 5.18-3). Projects that meet the following criteria are not required by the City to prepare a GHG technical analysis report, and are not considered to be significant.

TABLE 5.18-3
PROJECT TYPES THAT DO NOT REQUIRE A GHG ANALYSIS AND MITIGATION

Project Type	Project Size that Generates Approximately 900 Metric Tons of GHGs per Year
Single-Family Residential	50 units
Apartments/Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket/Grocery Space	6,300 square feet

For projects that do not meet the criteria outlined in Table 5.18-3, the City requires a GHG emissions analysis to demonstrate that the proposed project design achieves a 28.3 percent reduction relative to BAU GHG emissions (City of San Diego 2008b). This requirement is based on the CARB BAU 2020 Forecast and Scoping Plan, which identify reductions

needed to achieve an approximate overall 28.3 percent reduction in statewide BAU emissions by 2020.

If the project's 2020 GHG emissions with incorporation of GHG-reducing regulations and design features represent a 28.3 percent reduction relative to the project's BAU GHG emissions, the project would not result in a significant impact to global climate change.

5.18.3 Issue 1: Consistency with Adopted Plans, Policies, and Regulations

Would the CPU conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

5.18.3.1 Impacts

a. Consistency with Local GHG Reduction Measures

Policies within the CPU have been designed to reflect and implement the general GHG reduction recommendations of the General Plan, as well as the strategies of other local plans and state GHG reduction measures. These policies would also complement the City's operations-focused efforts of the Sustainable Community Program/CCP, the adopted CPAP, and City Council Policy 600-27 and Council Policy 900-14, referenced further in section 5.18.1.3.b.

Specifically, the CPU includes updated Conservation, Mobility, and Urban Design elements that include several policies aimed at reducing GHG emissions from target emission sources and/or aimed at adapting to climate change. The CPU policies provide refinement of the General Plan and citywide CPAP policies as specifically applicable to the CPU area. As described below, in several cases these policies are also consistent with key state GHG reduction plans, regulations, and recommended mitigation measures. An overview of relevant CPU elements and policies is outlined below.

Conservation Element

Climate Change and Sustainability Policies. The CPU contains policies 8.2-1 through 8.2-6 to provide a framework for addressing and adapting to climate change. These strategies are generally consistent with and encourage the implementation of the General Plan Mitigation Framework recommendations and Policies CE-A-1 through CE-A-13 as well as climate change mitigation and adaptation strategies of state plans and programs. These framework policies include the types of policies anticipated to be set forth in the draft CMAP currently being prepared by the City (refer to section 5.18.1.3.b).

Water Policies. The CPU's Conservation Element includes water conservation measures (Policies 8.3-1 through 8.3-4) to reduce the need for water, thereby reducing the energy use

embodied in water supply and treatment and its associated GHG emissions. The policies promote the use of reclaimed and recycled water. The policies are consistent with the outdoor water-reduction strategies of the General Plan, the state Climate Change Scoping Plan, the 2010 CAPCOA GHG Mitigation Measures report, and the recently effective 2011 CalGreen water-reduction requirements for residential and non-residential uses. At the individual project-level, some of these measures would be quantified.

Urban Forestry Policies. Street tree and private tree planting programs are low-cost, low-technology methods for improving the visual landscape and air quality in the CPU area. As the number and size of trees in the CPU area urban forest increase, so will the benefits. These benefits include lower energy consumption resulting from reduction in the size of the urban heat island; reduced storm water runoff through absorption of water by the trees; improved air quality achieved as trees convert carbon dioxide into oxygen, and an improved pedestrian environment created by providing pedestrians protection from the heat and glare of the sun.

Planting shade trees around buildings has been shown to effectively lower the electricity cooling demand of buildings by blocking incident sunlight and reducing heat gain through windows, walls, and roofs (CAPCOA 2010). By reducing cooling demand, shade trees help reduce electricity demand from the local utility, and therefore reduce GHG emissions which would otherwise be emitted during the production of electricity. Policies 8.5.1 through 8.5.5 of the CPU conform to the General Plan urban forestry Policies CE-J.1 through CE-J.5, and would promote the need for an increase in tree plantings in both residential and commercial areas.

Community Farms and Gardens Policies. The CPU area has the potential to provide multiple sites for community gardens that would contain individual and shared-plot spaces. The CPU Policies 8.6.1 and 8.6.2 would promote the development of community gardens within the community.

Establishment of community gardens has the potential to further reduce GHG emissions by providing residents with a local source of food, potentially resulting in a reduction in the number of trips and VMT traveled by food deliverers and the consumers to grocery stores and supermarkets. Community gardens would also contribute to GHG reductions by displacing carbon-intensive food production practices. These emissions reductions cannot be reasonably quantified at this time because they are based on several undefined parameters: the relative locations of the farmer's market, supermarket, and supermarket produce suppliers; the carbon intensity of food production practices; and the role of the farmer's market in a development.

Mobility Element

Through increasing density, bringing people closer to their work and providing pedestrian connections to retail, commercial, and residential units, a substantial reduction in VMT can

occur. A communitywide reduction in vehicle travel would reduce local VMT, which would in turn reduce emissions associated with vehicle use. The CPU would generate 1,045,025 ADT. The daily trip rates take into account the CPU density, diversity or mixed-use, improved walkability, and transit accessibility. The effectiveness of these land use strategies ranges from less than 1 percent up to a maximum 30 percent reduction in communitywide VMT (CAPCOA 2010).

The CPU Mobility Element includes numerous policies to improve the pedestrian (Policies 3.1-1 through 3.1-4) and bicycle network (Policies 3.4-1 and 3.4-2), and to increase transit accessibility and provide transit improvements (Policies 3.2-1 through 3.2-5). Generally, these policies would be consistent with the General Plan, and also consistent with the CARB Scoping Plan vehicle reduction measures for land use development and with specific traffic mitigation measures identified in the 2010 CAPCOA GHG Mitigation Measures report.

Urban Design Element

Distinct Districts and Streetscape Policies. Policies 4.1-1, 4.1-4, 4.1-15, 4.2-1, and 4.2-2 would promote enhanced connectivity to activity centers, active commercial centers supported by transit, improved pedestrian access and movement, pedestrian-oriented design principles, and improved walkability. Generally, these policies would be consistent with the General Plan, the CARB Scoping Plan, and the 2010 CAPCOA GHG Mitigation Measures report.

Sustainability Policies. Policies 4.9-1 through 4.9-5 would promote green building techniques that would be consistent with General Plan policies and with green building strategies recommended in the state Climate Change Scoping Plan and several of the measures identified in the 2010 CAPCOA GHG mitigation measures report. GHG reductions from these policies are not quantifiable at the program-level. Future development implemented in accordance with the CPU would be required to implement some of these measures, which would be quantified and their GHG reductions accounted for using the CalEEMod GHG emissions estimator model or other appropriate methods, thereby further reducing GHG emissions associated with the buildout of the CPU.

b. Consistency with State GHG Reduction Strategies

EO S-3-05 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target. The CARB Scoping Plan and its implementing and complementary regulations are discussed under Section 5.18.1.3 and generally encompass the GHG reduction strategies described at the beginning of this section. Subsequent to the CARB Scoping Plan, CAPCOA, released the report *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures* ("Mitigation Measures" report*),* that identifies specific project-level and program-level GHG reduction measures. The report includes quantification

of the GHG reductions that would be achieved through incorporation of project-level mitigation measures. These measures fall into the same categories as discussed earlier: transportation, energy, water and wastewater, solid waste, area source (woodstoves, fireplaces, landscaping equipment), and construction emissions. Most of the mitigation measures included in the CAPCOA report would be identified for project-level analyses; however, the project-level reduction strategies would be extrapolated to the program level. The program-level reduction measures included in the report are few in comparison and would be largely unquantifiable. They pertain to funding and incentive programs for increased energy efficiency, establishment of local farmer's markets and community gardens, urban shade tree planting programs, and communitywide strategies to reduce urban heat island effect. Several of the program-level measures, as well as the project-level measures, have been incorporated into the CPU, as discussed above.

In general, the CPU policies outlined above correspond to the intent of the GHG reduction measures identified in both the 2010 CAPCOA GHG Mitigation Measures report and the 2008 CARB Scoping Plan. Where practicable, GHG reductions have been included in the quantification of the CPU's GHG emissions, as described in Section 5.18.4 cumulative GHG emissions analysis. In the quantification of CPU GHG emissions, GHG reductions were accounted for vehicle emissions, and energy and water use emissions. These comprised the GHG reduction/mitigation measures that were quantifiable at the program-level. Subsequent projects would achieve further GHG reductions in these emissions sources, as well as in the area source, construction, and solid waste GHG emissions through project-specific design features.

5.18.3.2 Significance of Impacts

The CPU contains policies that would reduce GHG emissions from transportation and operational building uses (related to water and energy consumption, and solid waste generation, etc.) and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations. However, because project-level details are not known, there is the potential that projects would not meet the necessary City reduction goals put in place in order to achieve the reductions required by AB 32. Thus, the level of potential impacts associated with plan conflict would be significant.

5.18.3.3 Mitigation Framework

GHG-1: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Mobility, Urban Design, and Conservation elements of the CPU include specific policies to require dense, compact, and diverse development,

encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate-sensitive community design. These policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to BAU.

Future projects implemented in accordance with the CPU shall be required to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to BAU, to meet AB 32 year 2020 target levels. Quantifiable GHG reduction measures at the level of subsequent projects consist of:

- Building and non-building energy use
- Indoor and outdoor water use
- Area sources
- Solid waste disposal
- Vegetation/carbon sequestration
- Construction equipment
- Transportation/vehicles

5.18.3.4 Significance After Mitigation

Future projects implemented in accordance with the CPU would be required as a condition of project approval to include GHG-reducing features identified in a project-specific analysis as well as demonstrating consistency with applicable GHG plans, policies, and regulations. The effectiveness and feasibility of the GHG reduction measures stated above in reducing GHG emissions have been documented in the 2010 CAPCOA publication *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA 2010). They have subsequently been included in the mitigation modules of CalEEMod to quantify GHG emissions and reductions. These measures are included in the City's CMAP, yet to be adopted. These measures are best quantified at the project-level, because specific project-level design information is needed to calculate accurate GHG reductions. Therefore, even with adherence to the Mitigation Framework, GP and CPU policies, at the program-level, impacts related to GHG emissions would remain significant and unavoidable.

5.18.4 Issue 2: Cumulative GHG Emissions

Would implementation of the CPU generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

5.18.4.1 Impacts

Given current City guidance, the CPU would be required to demonstrate a 28.3 percent reduction in GHG emissions for the CPU and future projects implemented in accordance with the CPU. The vehicle portion of these estimates has been estimated both with and without accounting for the LCFS. Estimation without accounting for the LCFS is due to the fact that CARB's implementation of the LCFS GHG reduction program has been impeded by recent litigation. In December 2011, a preliminary injunction blocking CARB's implementation of the LCFS was granted. On April 23, 2012, the Ninth Circuit Court of Appeals overturned the injunction pending a ruling on the merits of the case, and as of April 30, 2012, LCFS enforcement is in effect and all outstanding reports are required to be submitted to CARB (CARB 2012). On September 18, 2013, the Ninth Circuit Court of Appeals reversed the ruling of the lower court, removed the injunction, and remanded the case back to the lower court to apply the *Pike* balancing test in determining if the regulation violates the United States Constitution interstate commerce clause by requiring business operations to be performed in the home state when they could be performed more efficiently elsewhere (U.S. Court of Appeals 2013). While there is no injunction currently in place, the City has determined there is sufficient legal uncertainty with this program that projects cannot rely on taking credit for CARB's implementation of the LCFS program when analyzing whether or not it meets the BAU threshold. Accordingly, the City has approved a new protocol requiring GHG technical studies to analyze project impacts both with and without reliance on the LCFS. As discussed previously, BAU emissions are the GHG emissions that would be expected to occur in the absence of GHG-reduction measures (including local and state regulations) or mitigation. To evaluate the CPU's GHG emissions relative to BAU, emissions have been quantified and projected to the year 2020 for both BAU and the CPU. This is because the AB 32, CARB BAU Forecast, and associated Scoping Plan GHG reduction targets (including the overall 28.3 percent reduction in BAU target) have been projected to a year 2020 horizon. Although the CPU has a time horizon of 15 to 20 years, with horizon year buildout anticipated to complete by roughly 2030 or 2035, no specific GHG reduction target has been identified in state legislation after 2020. Executive Order S-3-05 identified a GHG reduction target for 2050 but did not identify interim targets for the decades between 2020 and 2050. Establishing target reductions and significance of GHG emissions beyond 2020 is too speculative. Therefore, in this analysis the GHG emissions estimates based on an assumed buildout year of 2062 for the CPU have been compared to the 2020 GHG reduction goals in order to evaluate significance. In other words, for the purpose of this analysis, buildout is assumed to occur by 2062.

GHG emissions have been estimated using CalEEMod (SCAQMD 2011). In brief, the model estimates criteria air pollutants and GHG emissions by multiplying emission source intensity factors by estimated quantities of emission sources based on the land use information.

Emission estimates have been calculated for the three GHGs of primary concern (CO_2, CH_4, and N_2O) that would be emitted from construction and the five primary operational sources that would be associated with CPU buildout: mobile sources, area sources, energy use,

water use, and solid waste disposal. To evaluate the reductions in GHG emissions of the CPU relative to the BAU 2020 Forecast, emissions have been estimated for two scenarios: first, CPU buildout without GHG-reducing measures (i.e., CPU buildout under BAU conditions) and, second, CPU buildout with GHG-reducing measures. This allowed for a comparison between the CPU buildout with and without GHG-reducing measures in accordance with the City's 28.3 percent reduction goal.

Emissions due to land uses that currently exist in the CPU area have been calculated separately from emissions due to additional new construction that would occur under the CPU. It was assumed that future land uses would be constructed on currently vacant land. The distinction between these two categories has been made because of the differences in energy and water consumption rates for new development versus existing development constructed in accordance with older building codes.

Greater detail on CalEEMod and the methodology and assumptions used to estimate the CPU emissions are contained in the GHG technical report (see Appendix N).

a. Vehicle Emissions

For this analysis, CalEEMod default trip rates have been edited to reflect the trip rates identified for each land use subtype in the TIA (see Appendix J; Urban Systems Associates 2012). The default trip lengths have been used. CalEEMod default vehicle emission factors and fleet mix have been derived from the emission factors (EMFAC) 2007 model and adjusted for Pavley and the LCFS. For this analysis, the default values that account for Pavley and LCFS have been used to yield accurate estimates of the future CPU horizon year buildout with GHG reductions. Vehicle emissions under the BAU scenario would be those that would occur without regulations aimed at reducing vehicle emissions (Pavley and LCFS). To calculate the BAU scenario (i.e., the CPU without GHG reductions scenario), the CPU vehicle emissions have been divided by 0.70 to achieve a 30 percent increase in order to reflect the absence of those two regulations.

The traffic impact analysis determined that approximately 1,045,025 total vehicle trips would occur daily in association with horizon year buildout of the CPU (Urban Systems Associates 2012). The BAU and CPU GHG emissions due to vehicle sources are summarized in Tables 5.18-4 and 5.18-5, respectively. As shown, by accounting for statewide Pavley and LCFS vehicle and fuel regulations identified in the CARB Scoping Plan, BAU vehicle emissions would be reduced by roughly 30 percent. By accounting for only Pavley and not LCFS, BAU vehicle emissions would be reduced by roughly 20 percent.

TABLE 5.18-4
SUMMARY OF ESTIMATED BAU GHG EMISSIONS
($MTCO_2E$)

Emission Source	Emissions from Currently Existing Development	Emissions from New Development	Total BAU Emissions
Vehicle	738,452	669,176	1,407,628
Energy	195,730	191,122	386,851
Area	8,856	36,118	44,975
Water Consumption	916,242	555,687	1,471,929
Solid Waste Disposal	886,942	525,419	1,412,361
Construction	0	34,604	34,604
TOTAL	**2,746,222**	**2,012,126**	**4,758,348**

TABLE 5.18-5
SUMMARY OF ESTIMATED CPU GHG EMISSIONS
($MTCO_2E$)

Emission Source	Emissions from Currently Existing Development	Emissions from New Development	Total Future (2020) Emissions
Vehicle	516,916	468,424	985,340
Energy	195,730	182,189	377,918
Area	8,856	36,118	44,975
Water Consumption	916,242	444,550	1,360,792
Solid Waste Disposal	886,942	525,419	1,412,361
Construction	0	34,604	34,604
TOTAL	**2,524,686**	**1,691,303**	**4,215,989**

b. Energy Use Emissions

CalEEMod default energy values have been based on the California Energy Commission-sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies, which identify energy use by building type and climate zone. Because these studies have been based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 building codes. The default adjustment was made to the current 2008 Title 24 energy code (part 6 of the building code). Adjustments to simulate the 2005 Title 24 energy code are also available in CalEEMod.

For the BAU energy emissions estimate and the existing conditions estimate, GHG emissions from energy use have been calculated based on construction in accordance with the 2005 Title 24 energy code. For the estimates of the CPU, energy emissions have been estimated based on all new development constructed in accordance with the 2008 Title 24 energy code and all existing development, which would remain under buildout of the CPU, constructed in accordance with the 2005 Title 24 energy code. The BAU and CPU GHG

emissions associated with energy use are summarized in Tables 5.18-4 and 5.18-5, respectively.

The Title 24 energy code is updated every five years or so to account for changing technologies. It is likely that over the lifetime of the CPU, the energy code would be updated to include increased standards that would further reduce building energy demand and associated GHG emissions. New building construction and major renovations subject to the updated code would have an improved energy efficiency profile compared to the existing buildings or newer buildings built to comply with earlier versions of the energy code. Subsequent projects would also voluntarily exceed the current Title 24 energy code, install high-efficiency lighting and plug-in appliances, and/or include on-site renewable energy generation. At the project level, the GHG reductions from these actions would be quantified in CalEEMod in accordance with the 2010 CAPCOA GHG Mitigation Measures report. Therefore, over time, the level of GHG emissions resulting from building energy use would be less than the estimates presented in Tables 5.18-4 and 5.18-5.

Also, as discussed earlier, the CARB Scoping Plan includes a Renewables Portfolio Standard, which requires public utilities to acquire an increasing proportion of their energy supply from renewable energies. By 2020, 33 percent of all statewide electricity generation would come from renewable energies. This would result in a statewide emissions reduction of 26.3 $MMTCO_2E$. Through implementation of the Renewables Portfolio Standard, GHG emissions from electricity generation needed to supply future projects would likely decline as energy supply shifts from fossil fuel-based energies to renewable energy. Renewable energies have zero to little carbon content and their use in electricity generation emits fewer GHGs. Therefore, over time the quantity of GHG emissions resulting from the CPU's buildout energy consumption would likely be less than those presented in Tables 5.18-4 and 5.18-5.

c. Area Source Emissions

Area source emissions include hearths, woodstoves, and landscaping equipment. The use of hearths (fireplaces) and woodstoves directly emits CO_2 from the combustion of natural gas, wood, or biomass, some of which are classified as biogenic. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. CalEEMod estimates the number and type of landscape equipment needed based on the number of summer days given the project's location. The model defaults for hearths, woodstoves, and landscaping equipment have been used.

The BAU and CPU GHG emissions due to area sources are presented in Tables 5.18-4 and 5.18-5, respectively. The same quantities have been estimated to occur under BAU and CPU conditions, as no area source GHG reductions would be accounted for at the program level in the CalEEMod estimates.

Measures that would reduce area source emissions include restrictions on hearth fuel type or limits on their quantity or restrictions against the inclusion of hearths in residential projects. Future project-level reduction measures would also include the use of only electric-powered landscaping equipment, such as electric lawnmowers, electric leafblowers and electric chainsaws, versus gasoline or diesel-powered landscaping equipment. These measures have been included in CalEEMod's area source mitigation module, but require quantified project-level data in order to account for any GHG reductions. Subsequent projects that incorporate these kinds of design features or requirements would emit reduced area source GHGs relative to BAU area source emissions.

d. Water Use Emissions

The amount of water used and wastewater generated by a project would have indirect GHG emissions associated with it. These emissions would be a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment would directly emit both methane and nitrous oxide.

Default water consumption rates have been used for the estimates of BAU and existing conditions, including the existing land uses that would remain within the CPU horizon year. However, for the future/new land uses of the CPU, a 20 percent reduction in water use was applied in accordance with recent requirements of CalGreen. Similar to energy use, recent updates to the water conservation element of Title 24 have resulted in increased water conservation for development subsequent to 2010. New construction that would occur under the CPU would be constructed in accordance with the current 2011 CalGreen or later water conservation requirements. Because the 2011 CalGreen (i.e., Part 11 of Title 24) requires a minimum 20 percent reduction in water use, a 20 percent reduction in BAU water use has been factored into the CPU emissions.

The BAU and CPU GHG emissions due to water consumption are presented in Tables 5.18-4 and 5.18-5, respectively. It should be noted that industrial land uses consume significantly more water than other land uses. Due to the large amount of industrial uses in the CPU area, GHG emissions due to water use would be much greater in the CPU area than in other areas dominated by residential and commercial development.

The CARB Scoping Plan also includes other potential GHG reduction strategies associated with the water sector which they estimate would reduce statewide water sector GHGs an additional 4.8 $MMTCO_2E$ by 2020. The measures require water suppliers to improve energy and other efficiencies associated with water supply. Thus, it is possible that the embodied energy and resulting GHG emissions associated with supplying potable water to the CPU would decrease somewhat by 2020 through these statewide efforts.

Also, certain design-specific measures that would not be quantifiable at the program level would reduce subsequent projects' water use GHG emissions. Measures that would reduce

water use emissions at the project level include increased water conservation beyond the mandatory minimums in CalGreen, the use of reclaimed water or gray water, and the incorporation of green landscape design methods such as turf reduction/minimization, use of water-efficient plants and materials, and use of highly water-efficient irrigation systems. Project-level design information would be required to quantify the GHG reductions, such as the percent of reduction in water flow for various plumbing fixtures, percent of indoor/outdoor water use served by reclaimed or gray water, area of turf reduction, water demand in gallons per year of the water-efficient landscape design, and so forth.

e. Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. CalEEMod determines the GHG emissions associated with disposal of solid waste into landfills. Portions of these emissions are biogenic. CalEEMod methods for quantifying GHG emissions from solid waste have been based on the Intergovernmental Panel on Climate Change (IPCC) method using the degradable organic content of waste. Existing, BAU, and CPU GHG emissions associated with waste disposal have been all calculated using CalEEMod's default parameters.

The BAU and CPU GHG emissions due to solid waste are presented in Tables 5.18-4 and 5.18-5, respectively. The same quantities have been estimated to occur under BAU and CPU conditions, as no solid waste GHG reductions would be accounted for at the program level. Similar to water use, industrial land uses typically generate more waste than other land uses. Due to the large amount of industrial uses in the CPU area, GHG emissions due to solid waste would be greater in the CPU area than in other areas in the basin.

Measures that would reduce solid waste GHG emissions below BAU levels include the institution of recycling and composting services that achieve a quantifiable percentage reduction in the baseline waste disposal. Project-level information would be required in order to account for any GHG reductions. Subsequent projects that incorporate this or other kinds of waste minimization features or requirements would emit reduced solid waste GHGs relative to BAU solid waste emissions.

f. Construction Emissions

Construction activities emit GHGs primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in on-road construction vehicles and in the commute vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in any water use (for fugitive dust control) and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHG emissions, in volumes proportional to the quantity and type of construction equipment used. The heavier equipment typically emits more GHGs per hour of use than the lighter equipment because of their greater fuel consumption and engine design.

Construction is a temporary source of GHG emissions. Although these emissions are temporary, the impact from the emissions of GHGs is cumulative. The Association of Environmental Professionals (AEP) has recently recommended that total construction GHG emissions resulting from a project be amortized over 30 years and added to operational GHG emissions to provide a cumulative estimate of annual GHG emissions for the plan (AEP 2010). However, the exact nature and timing of development with the CPU area is unknown at this time. In order to provide an estimate of the GHG emissions that would occur from construction of new development, CalEEMod construction defaults have been assumed and the construction phasing has been adjusted to 30 years. Also, as recommended in a recent (March 2012) CalEEMod workshop conducted by CARB, because CalEEMod overestimates construction emissions by roughly 30 percent, the resulting total quantity of construction emissions estimated by CalEEMod has been multiplied by 0.70 to obtain total construction GHGs.

The BAU and CPU GHG emissions due to construction activities are presented in Tables 5.18-4 and 5.18-5, respectively. No quantifiable construction GHG reductions can be accounted for at the program level; therefore, the estimated emissions for both the BAU and CPU conditions would be the same.

The Scoping Plan does not identify any statewide measures specific to reducing GHG emissions from construction activities. However, the Scoping Plan reduction measure affecting heavy-duty truck emissions would potentially encompass construction on-road diesel vehicles and off-road equipment, and further reduce emissions through improved engine technology and conversion to non-diesel, low-carbon fuels. These GHG reductions would be realized by subsequent future projects implemented in accordance with the CPU.

Other project-level measures would be implemented that would reduce BAU construction emissions. While most of the reduction measures pertain to reducing criteria pollutants, particularly particulates, options to reduce GHG emissions include restrictions on equipment fuel type, engine tier, and use of oxidative catalyst reduction.

g. Total Combined Emissions

As shown in Table 5.18-4, the combined total BAU GHG emissions without GHG reductions would be approximately 4,758,348 $MTCO_2E$. Of this total, approximately 2,746,222 $MTCO_2E$ (57.7 percent) would be associated with the CPU's currently existing development, and 2,012,126 $MTCO_2E$ (42.3 percent) would be associated with new proposed development, consistent with the CPU.

As shown in Table 5.18-5, the combined total CPU GHG emissions without GHG reductions would be approximately 4,215,989 $MTCO_2E$. Of this total, approximately 2,524,686 $MTCO_2E$ (59.9 percent) would be associated with the CPU's currently existing development, and 1,691,303 $MTCO_2E$ (40.1 percent) would be associated with new proposed development.

Table 5.18-6 summarizes the CPU's estimated BAU emissions, emissions with GHG reductions, and resulting percentage reductions, for evaluation against the City's goal of a 28.3 percent reduction relative to BAU.

TABLE 5.18-6
ESTIMATED CPU GHG EMISSIONS AND BAU REDUCTIONS
($MTCO_2E$)

Emission Source	BAU Emissions (i.e., without GHG Reductions)	CPU Emissions with Project-Level GHG Reductions	Percent Reduction Relative to BAU Reduction Target
Vehicles	1,407,628	985,340	30.0
Energy Use	386,851	377,918	2.3
Area Sources	44,975	44,975	0.0
Water Use	1,471,929	1,360,792	7.6
Solid Waste	1,412,361	1,412,361	0.0
Construction	34,604	34,604	0.0
TOTAL	**4,758,348**	**4,215,989**	**11.4***

*An 11.4 percent reduction accounts for Pavley and LCFS reductions in vehicle emissions, 2008 Title 24 reductions in energy emissions, and CalGreen reductions in water use emissions. By not including the LCFS reduction, the total percent reduction relative to BAU becomes 9.1 percent.

Estimated emissions reductions accounted for in this analysis are due to regulations on auto and fuel manufacturers (Pavley and LCFS) and to the recently updated Title 24 California Building Code that contains increased energy and water efficiency requirements. The Mobility, Urban Design, and Conservation elements of the CPU include specific policies aimed at decreasing vehicle use and increase energy efficiency; however, these cannot be quantified in terms of their GHG emissions reductions at the program level.

BAU emissions would total 4,758,348 $MTCO_2E$ annually. The CPU emissions with GHG reductions would total 4,215,989 $MTCO_2E$ annually. This reduction in BAU emissions of 542,359 $MTCO_2E$ each year would be due to regulations on auto and fuel manufacturers that would reduce vehicle emissions by 2020. Reduction would also be due to the recently updated Title 24 California Building Code that contains increased energy and water efficiency requirements that would reduce GHG emissions from those sources for additional new development. Of the estimated 4,215,989 $MTCO_2E$ of GHGs associated with buildout of the CPU, the majority (59.9 percent) would come from currently existing development and the remainder (40.1 percent) would come from additional new development.

The CPU GHG emissions, when compared to the BAU annual emissions, would result in an 11.4 percent reduction in GHG emissions relative to BAU. This falls short of meeting the City's goal for demonstrating a minimum 28.3 percent reduction in GHG emissions relative to BAU. When comparing the new proposed development only (i.e., not taking into account the GHG emissions from currently existing development), the CPU would result in a 15.9 percent reduction relative to BAU. The Mobility, Urban Design, and Conservation elements of the CPU include specific policies aimed at decreasing vehicle use and increase energy

efficiency; however, these cannot be quantified in terms of their GHG emissions reductions at the program level. Because the CPU GHG emissions would fall short of the 28.3 percent reduction goal relative to BAU, the cumulative GHG emissions generated from CPU buildout would be considered significant. Therefore, subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

It should be noted that if the CPU were not adopted, development in Otay Mesa would continue to occur in accordance with the currently adopted Community Plan. The adopted Community Plan allows for more development than the CPU. The adopted Community Plan would also generate more traffic than the CPU. The CPU would introduce higher density residential and commercial land use designations, as well as several new mixed-use and industrial land use designations. As such, the GHG emissions associated with the adopted community plan would be greater than those summarized in Table 5.18-6.

5.18.4.2 Significance of Impacts

The 9.1 to 11.4 percent reductions relative to BAU fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to BAU, and therefore impacts associated with GHG emissions under the CPU would be significant and unavoidable.

The Mobility, Urban Design, and Conservation elements of the CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate-sensitive community design. These policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to BAU. These policies are discussed in detail in Section 5.18.3.

Despite the inclusion of these policies (most of which are not quantifiable in terms of their GHG emissions reductions at the program level), and despite the GHG reductions gleaned from statewide regulations on vehicle GHG emissions and building energy and water use, the CPU's projected GHG emissions would fall short of meeting the 28.3 percent GHG reduction target relative to 2020 BAU.

5.18.4.3 Mitigation Framework

GHG-2: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation measure GHG-1 in Section 5.18.3.3.

The approximate gap of 16.9 to 19.2 percent in meeting the target reductions shall consist of one or a combination of several effective and quantifiable GHG reduction measures that pertain to: building and non-building energy use; indoor

and outdoor water use; area sources; solid waste disposal; vegetation/carbon sequestration; construction equipment; and transportation/vehicles. Project-level GHG reduction design features shall demonstrate a reduction in BAU GHG emissions to 28.3 percent or more relative to BAU, and to the extent practicable, shall be required for future development projects implemented in accordance with the CPU.

5.18.4.4 Significance after Mitigation

While future development projects within the CPU area would be required to implement GHG emission reduction measures to the extent practicable, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each future project at this program-level of analysis. Therefore, buildout of the CPU would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unavoidable at the program-level, even with adherence to the Mitigation Framework. Please also refer to Mitigation Framework GHG-1 in Section 5.18.3.3.

6.0 Cumulative Impacts

6.1 Introduction

CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Section 15355 further states that cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130(a) of the State CEQA Guidelines requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined in Section 15065(a)(3), "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

According to Section 15130(b) of the State CEQA Guidelines, the discussion of cumulative effects "…need not provide as great a detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness…" The evaluation of cumulative impacts is to be based on either (A) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or (B) "a summary of projections contained in an adopted local, regional, or statewide plan or related planning document, that describes or evaluates conditions contributing to the cumulative effect…Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency" (CEQA Guidelines Section 15130(b)(1)).

Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, which may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans, and the Lead Agency determines that the regional or area- wide cumulative impacts of the proposed project have already been adequately addressed in a certified EIR for that plan. In addition, Section 15130(e) states that "if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact as provided in Section 15183(j)."

This cumulative impacts analysis relies primarily on the cumulative impact analysis of the General Plan PEIR, which concluded that implementation of the General Plan would result in significant and unmitigable cumulative impacts to the following environmental issue areas:

agricultural resources, air quality, biological resources, geologic resources, health and safety, historical resources, hydrologic resources, land use, mineral resources, noise, paleontological resources, population and housing, public facilities, public services and utilities, transportation/traffic/circulation/parking, visual effects and community character, water quality and global warming.

6.2 Cumulative Analysis Setting and Methodology

A broad examination of cumulative impacts involves considering the CPU together with growth of the City and the region. Development pursuant to the General Plan would occur in accordance with the land use designations and development intensities identified in the Land Use and Community Planning Element. The land uses and the associated potential development designated in the General Plan correlate to regional growth estimates made by SANDAG. SANDAG estimates anticipated growth for the 18 cities and the unincorporated areas within San Diego County for the purpose of allocating growth to specific areas and identifying regional transportation infrastructure needed to support regional growth.

Section 5 of the PEIR for the City's General Plan discusses the cumulative impacts that result from its implementation and is therefore, incorporated by reference. The analysis in the General Plan PEIR relied on the regional growth projections provided by the SANDAG *2030 Regional Growth Forecast Update* (Regional Growth Forecast) estimates for employment, population, and housing for the period between 2004 and 2030. Cumulative impacts were analyzed in light of the significance thresholds presented in Sections 3.1 through 3.17 of the General Plan PEIR, with the exception of global warming impacts, which were discussed separately in Section 6.2.

Cumulative impacts would occur as a result of multiple projects developed by 2030. The General Plan strategy anticipated the cumulative effects of growth and planned for it in a manner that would be balanced in its approach. The focused growth strategy addresses future growth as a whole, and includes policies to avoid or reduce impacts on a cumulative basis.

6.2.1 Plans and Programs Evaluated for Cumulative Impacts

The City of San Diego General Plan; the City of San Diego MSCP Subarea Plan and Draft Vernal Pool HCP; the City of San Diego Land Development Code, and the SANDAG RCP were used to evaluate cumulative impacts and are briefly described below. These documents are on file at the City of San Diego Development Services Department, 1222 First Avenue, San Diego, California 92101. A summary of anticipated significant impacts identified for the plans evaluated is included in Table 6-1.

TABLE 6-1
PLANS AND PROGRAMS USED FOR CUMULATIVE ANALYSIS

Map Number	Project	Project Location	CEQA Document (as of August 2013)	Significant Impacts by Resource Issue Area
1	City of San Diego General Plan	City of San Diego	Final EIR certified and plan adopted in March 2008	agricultural resources; air quality; biological resources; geologic conditions; health and safety; historical resources; hydrology; land use; mineral resources; noise; paleontological resources; population and housing; public facilities; public utilities; traffic; visual effects/neighborhood character; water quality; global warming
2	City of San Diego MSCP Subarea Plan	City of San Diego	Final EIR certified and plan adopted in March 1997	land use, biology
3	SANDAG RCP	San Diego region	Final EIR certified and plan adopted in July 2004	land use, population/housing, visual resources, transportation/circulation, air quality, noise, energy, geology/paleontology, hydrology/water resources, biological resources, cultural resources, and public services/utility systems.
4	City of San Diego Land Development Code	City of San Diego	Final EIR certified and adopted in 1999	land use, biological resources, landform alteration, historical resources, paleontological resources, human health and public safety; cumulative: soils/erosion hazard, air quality, hydrology/water quality, biological resources, land use, transportation/circulation, landform alteration, historical resources and paleontological resources.

6.2.1.1 City of San Diego General Plan

A comprehensive update of the City's General Plan (March 10, 2008) is based on a new planning strategy for the City developed in 2002. The Strategic Framework Plan describes the role and purpose of the General Plan, outlines the City of Villages strategy, presents ten Guiding Principles that helped to shape the General Plan, summarizes the plan's elements, and discusses how implementation would occur.

Under the City of Villages strategy, the General Plan aims to direct new development away from natural undeveloped lands into already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

6.2.1.2 City of San Diego MSCP Subarea Plan and Draft Vernal Pool HCP

The City of San Diego's MSCP Subarea Plan was approved in March 1997, and provides a process for the issuance of ITPs under the federal and state Endangered Species Act and the California NCCP Act. The primary goal of the City's MSCP Subarea Plan is to conserve viable populations of sensitive species and regional biodiversity while allowing for reasonable economic growth. To carry out this goal, the City's MSCP Subarea Plan establishes an area in which a permanent MSCP preserve, known as the MHPA, is assembled. Development or other discretionary actions are allowed a 25 percent encroachment into the least environmentally sensitive portion of the property.

The City's MSCP Subarea Plan additionally provides MHPA Land Use Adjacency Guidelines, which aim to avoid or reduce significant indirect impacts from adjacent uses. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development and are intended to be addressed on a project-by-project basis either in the planning or management stage. New development located adjacent to the MHPA would be required to incorporate measures for reducing potential indirect impacts through implementation of all applicable Land Use Adjacency Guidelines as outlines in the MSCP Subarea Plan.

Additionally, as of the writing of this PEIR, the City is in the process of developing a draft Vernal Pool HCP. The draft HCP is envisioned as a comprehensive planning approach to preserve vernal pool species and their habitat within the City's jurisdiction. The HCP would create a new preserve boundary and updated conditions of coverage for sensitive species, including San Diego and Riverside fairy shrimp, San Diego button celery, spreading navarretia, California orcutt grass, San Diego mesa mint, and Otay mesa mint.

6.2.1.3 SANDAG RCP

The RCP (2004) is the long-range planning document developed by SANDAG to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The RCP establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The RCP encourages cities and the County to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. Basic smart growth principles are designed to strengthen land use and transportation integration through an emphasis on pedestrian-friendly design and mixed-use development.

The RCP also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

6.2.1.4 City of San Diego Land Development Code

Chapters 11 through 15 of the City's Municipal Code (MC) are referred to as the Land Development Code (LDC). The LDC consolidates all development regulations into a sequence of four chapters of the MC consisting of citywide base zones, overlay zones and the planned district ordinances, as well as other requirements to guide development such as the steps for processing development permits, noticing, public hearings and decision-making processes, definitions and rules for calculations and measurements, LDC defined terms, enforcement, use regulations and permit types, as well as procedures for implementation of CEQA and the State CEQA Guidelines. The LDC also includes the ESL and Historical Resources Regulations, as well as the Brush Management Regulations, Landscape Standards and the Storm Water Standards, and the Land Development Manual which includes guidelines for preparing technical reports used to evaluate development projects.

6.3 Cumulative Effects Analysis

6.3.1 Land Use

The General Plan PEIR concluded that the gradual development of this region would result in significant, unavoidable cumulative land use impacts. Certification of the General Plan PEIR included the adoption of mitigation measures that provide strategies for future development proposals in an attempt to reduce significant land use impacts from future projects.

The assessment of cumulative land use impacts also relies on the SANDAG RCP, as well as the City of San Diego's MSCP Subarea Plan, Draft Vernal Pool HCP and the Land Development Code. One of the overriding land use goals in the RCP is to promote locating future development near existing and planned urban infrastructure, including transit. The MSCP Subarea Plan was prepared in order to meet the requirements of the California Natural Communities Conservation Planning Act (NCCP) of 1992 and forms the basis of the Implementing Agreement which is a contract between the City and the wildlife agencies to ensure implementation of the plan and allows the City to issue take permits at the local level. The MHPA was also developed by the City in cooperation with the wildlife agencies, property owners, developer and environmental groups and delineates the core biological resource areas and corridors targeted for conservation. Limited development is allowed in the MHPA and is further defined in the MSCP Subarea Plan and the ESL Regulations of the LDC.

As discussed in Section 5.1, Land Use, the CPU contains nine elements, each providing community-specific goals, policies, and recommendations. These are consistent with citywide zoning classifications, development design guidelines, other mobility and public realm guidelines, incentives, and programs in accordance with the general goals stated in the City's General Plan. The CPU includes the application of existing, new, or modified zoning, which is consistent with the General Plan goals and policies; therefore, community buildout resulting from development proposals would be consistent with community goals and character.

The CPU's land use plan includes two village opportunity areas that would help to minimize the potential impacts associated with growth. The CPU implements the General Plan by integrating housing in proximity to employment, within pedestrian-friendly, mixed-use village centers located along transit corridors. This occurs in the western portion of the CPU area. The eastern portion of the CPU area preserves Prime Industrial Lands allowing growth of industry and international business opportunities. Incorporation of these concepts would result in the accommodation of population growth primarily within compact village centers, along with the maintenance and development of industrial, business and international trade.

The proposed CPU would contribute to an overall increase in density and intensity of uses within the CPU area. The City's General Plan anticipated the cumulative effects, associated with denser, mixed-use villages and created specific design and planning standards, which are mirrored in the proposed CPU. The CPU would not result in direct or cumulative impacts associated with Land Use Plan Conflicts or Land Use Compatibility.

As discussed in Section 5.1.5, development under the CPU would not result in conflicts with the City's ESL or HRR. The City's process for the evaluation of discretionary projects includes environmental review pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of both the General and Community Plan. Implementation of General Plan and CPU policies and compliance with federal, state, and local regulations at the project-level would preclude adverse physical changes to the environment associated with land use impacts. The CPU includes specific

submittal requirements for future projects implemented in accordance with CPIOZ Type A with respect to biological and historical resources. Those projects that can demonstrate that no resources are present would not be subject to further evaluation under CEQA. However, for some projects it is possible that resources would be present and subject to discretionary review under CPIOZ Type B and therefore, subject to CEQA.

MHPA boundary adjustment(s) may be proposed as part of future development within the CPU area. The City's MSCP allows for adjustments to the MHPA boundary without the need to amend the MSCP Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. Six functional equivalency criteria in accordance with the Final MSCP Plan, Section 5.4.2 must be prepared as part of the MHPA boundary adjustment equivalency analysis. Any MHPA boundary adjustments would require concurrence from the Wildlife Agencies. Any MHPA boundary adjustments and functional equivalency analysis would be addressed at the time future development proposals are brought forward pursuant to the adopted CPU. Potential impacts to MHPA preserve configuration as a result of MHPA boundary adjustments would not be considered significant, because the adjustment must meet the required MHPA equivalency analysis criteria and obtain approval from the Wildlife Agencies. Potential impacts to sensitive vegetation and species would be analyzed and mitigated consistent with mitigation measures BIO-1 (uplands) and BIO-4 (wetlands).

6.3.2 Visual Effects and Neighborhood Character

This cumulative assessment of visual impacts relies on the General Plan PEIR. The cumulative study area included in the General Plan EIR was the entire San Diego County region and consisted of significant landscape features and landforms. The General Plan PEIR concluded that the gradual development of this region would result in cumulatively significant aesthetic impacts and included mitigation measures that provide strategies for future development proposals to apply in an attempt to reduce significant visual impacts.

Future growth pursuant to adopted plans in the region including the CPU, does not have the potential to result in a cumulative visual impact. Although adoption of the CPU would contribute to the increased urbanization in the subregion; the extent of adverse effects on visual character would be reduced through implementation of CPU policies addressing design and location of future buildings and inclusion of open-space, neighborhood parks, etc. Changes in visual character and quality resulting from future development within the CPU area would contribute incrementally to cumulative impacts; however, this would be an improvement with regards to aesthetics because development would occur where no development currently exists.

The CPU Urban Design Element contains goals and policies to ensure that development within the CPU area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area or strongly contrast with

the surrounding development or natural topography through excessive bulk, signage, or architectural projection. The design controls placed on subsequent development would ensure that development occurs in accordance with the CPU's goals, policies and design objectives. Therefore, the CPU's incremental contribution to visual impacts would not be cumulatively considerable.

6.3.3 Air Quality/Odor

While air quality in the SDAB has generally improved over recent decades due to auto emissions and other emissions restrictions and improved technologies, the SDAB is currently in non-attainment for federal and state ozone standards and state PM_{10} and $PM_{2.5,}$ and is unclassifiable for the federal PM_{10} standard. Past development has contributed to this condition and future development forecasted for the region would generate increased air pollution emissions associated with construction activities, transportation, and stationary sources, which could exceed regional air quality standards. Construction activities in particular would result in emissions of PM_{10} and $PM_{2.5}$. In addition, the increased volume of traffic generated by new development would increase localized concentrations of CO_2. While it is not anticipated that construction activities throughout the CPU area would occur simultaneously, there is no way to determine a precise construction schedule at this program-level or whether construction activities within the CPU area would occur concurrently with projects in adjacent areas. Because the air basin is in non-attainment for ozone, PM_{10} and $PM_{2.5,}$ any potential increase in emissions of these criteria pollutants resulting from future development would pose potential cumulatively considerable and significant air quality effects.

The cumulative assessment of air quality impacts to the SDAB relies on assessment of CPU project consistency with the adopted RAQS and SIP. The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum buildout of land uses as allowed in the adopted community and general plans. Potential cumulative air quality impacts would thus be reduced through achievement of emission levels and reduction strategies identified in the RAQS. With regard to ozone precursors ROGs and NO_x, in general, if a project is consistent with the General Plan land use designations and intensity, it has been accounted for in the ozone and other criteria pollutant and TAC attainment demonstrations contained within the SIP, and would not result in a cumulatively considerable ambient air quality impact. In this case, the most recent RAQS/SIP is based on the adopted community plan. As discussed in Section 5.3, Air Quality, area and mobile emissions under the proposed CPU would be less than area and mobile emissions under the adopted community plan for all criteria pollutants. Therefore, the proposed CPU is consistent with the SIP and RAQS and would not result in a cumulatively considerable ambient air quality impact. However, as further discussed in Section 5.3 Air Quality, buildout of the CPU would result in increased construction and operational emissions as well as the generation of air pollutants associated with planned industrial uses (stationary sources) and exposure of toxic

air emissions to sensitive receptors resulting from collocation, and would therefore result in a significant cumulative air quality impact.

Although future development proposals within the CPU area would be required to evaluate and mitigate potentially significant project-level impacts, no feasible mitigation measures are available at this program-level. Therefore, air quality impacts associated with buildout of the CPU would be significant and cumulatively considerable.

6.3.4 Biological Resources

Preservation of the region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City of San Diego, are managed through the adopted MSCP Subarea Plan which is incorporated by reference in the City's adopted General Plan.

As discussed in Section 5.4, Biological Resources, the CPU area currently supports a number of sensitive resources including riparian scrub, freshwater marsh, vernal pools, coastal sage scrub, native grassland, maritime succulent scrub, non-native grassland, and southern mixed chaparral. The distribution of these sensitive vegetation communities present in the CPU area are shown on Figure 5.4-2. Likewise, there are 23 sensitive plant species and 28 sensitive wildlife species occurring or historically known to occur in the CPU area. The Dennery and Spring canyons, connected by the Otay Mesa Road culvert, are major wildlife movement corridors within the CPU area. Additionally, the canyons along the Otay River Valley on the northern boundary of the CPU area provide for east-west wildlife movement.

The CPU incorporates several policies related to the protection of biological resources. These are detailed in Section 5.4.4.1 and focus primarily on the CPU's consistency with the City's ESL Regulations, the Biology Guidelines and MSCP Subarea Plan Management Policies to protect the area's sensitive plants and animals. This PEIR also includes a mitigation framework for future development implemented in accordance with the CPU.

Future commercial, business park and industrial development applications for properties that are subject to the CPIOZ and that are consistent with the CPU zone regulations, and the supplemental CPIOZ regulations, would be processed ministerially (CPIOZ Type A) in accordance with the procedures of the CPIOZ which requires preparation and submittal of a focused biological resources survey to determine presence or absence of sensitive plants and animal species. Future development proposal that do not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone would apply for a CPIOZ Type B permit and would be required to obtain discretionary approval through a Site Development Permit. Implementation of the CPIOZ would ensure consistency of all future development with CPU goals and policies. Although implementation of the CPU has the potential to result in significant direct and indirect impacts to sensitive plant and animal

species which can be mitigated at the project-level, these projects would be required to implement the Mitigation Framework identified in the MMRP which requires site-specific environmental review, analysis of potential impacts to biological resources, and recommendations for mitigation to reduce significant project-level biological resource impacts to below a level of significance. Although each individual future project implemented in accordance with the CPU would contribute to incremental biological resource impacts, compliance with adopted CPU policies, the MSCP Subarea Plan, ESL Regulations, the Biology Guidelines and strict adherence to the Mitigation Framework would ensure that impacts from future development would not be cumulatively significant.

6.3.5 Historical Resources

The General Plan PEIR stated that the continued pressure to develop or redevelop areas would result in incremental impacts to the historic record in the San Diego region, which was determined to be a cumulatively significant impact. Regardless of the efforts to avoid impacts to historical resources, the more that land is redeveloped, the greater the potential for impacts to historical resources. Furthermore, the General Plan, RCP and LDC EIR's concluded that the loss of historical resources in the region would be cumulatively significant.

The Historic Preservation Element of the CPU includes specific policies addressing the history and historical resources unique to the CPU area in order to encourage appreciation of the community's history and culture. As discussed in Section 5.5, Historical Resources, the CPU would result in direct impacts to historical resources. The goals, policies, and recommendations enacted by the City, combined with the federal, state, and local regulations described in Section 5.5, provide a framework for developing project-level mitigation measures for future subsequent development projects.

Future commercial, business park and industrial development applications for properties that are subject to the CPIOZ and that are consistent with the CPU zone regulations, and the supplemental CPIOZ regulations, would be processed ministerially (CPIOZ Type A) in accordance with the procedures of the CPIOZ which requires preparation and submittal of a archaeological survey to determine presence or absence of resources within a project site. Future development proposal that do not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone would apply for a CPIOZ Type B permit and would be required to obtain discretionary approval through a Site Development Permit. Implementation of the CPIOZ would ensure consistency of all future development with CPU goals and policies. These policies and regulations are designed to reduce impacts to historical resources to below a level of significance.

There are no impacts associated with the historical built-environment, and therefore, they are not considered in the cumulative analysis. Potential impacts to Historical Resources (Archaeology) are individually significant and when taken into consideration with other past

projects, current projects and probable future projects in the CPU or region, do contribute to a cumulative impact; specifically with respect to non-renewable resources. However, with implementation of the Mitigation Framework detailed in the PEIR, information associated with these resources from project-level analysis would be collected, catalogued and included in technical reports available to researchers for use on future projects, thereby reducing the cumulative impact to below a level of significance.

6.3.6 Human Health/Public Safety/Hazardous Materials

The cumulative assessment of impacts to human health/public safety/hazardous materials relies in part on the General Plan PEIR and the Hazardous Materials Technical Study (HMTS) prepared for the CPU. The General Plan PEIR concludes that the population growth occurring during implementation of the General Plan would result in an incremental increase in the number of people exposed to hazards. The General Plan PEIR includes the adoption of mitigation measures that provide strategies for future development proposals to reduce significant impacts to human health and safety. However, because the degree of future impacts and applicability, feasibility, and success of future mitigation measures would not be adequately known at the program-level, the General Plan PEIR concluded that there would be a cumulatively significant impact to human health and safety.

Projected population growth associated with the CPU would increase the number of people potentially exposed to hazards associated with wildfires. As discussed in Section 5.6, Human Health/Public Safety/Hazardous Materials, City regulations, as well as General Plan and CPU policies, would help reduce, but not completely abate, the potential risks of wildland fires, and subsequent review of development proposals implemented in accordance with the CPU would likely result in a reduction of impacts through design measures focused on fire safety. However, for some projects, it is possible that adherence to regulations may not adequately avoid or reduce incremental urban and wildland fire impacts, and such projects would require additional measures.

The CPU would introduce additional residents and businesses within the AIA for Brown Field. Future development pursuant to the CPU would require consistency with the adopted ALUCP. Therefore, implementation of the CPU would not result in a cumulative impact associated with aircraft hazards.

As further discussed in Section 5.6, Human Health/Public Safety/Hazardous Materials, a total of six sites associated with County's DEH site assessment and mitigation cases were identified within the CPU area. The CPU includes new uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations that would allow certain business and industrial operations to generate, transport, or temporarily store hazardous waste within the vicinity of residential uses. The addition of trucks serving local businesses would also expose an increased number of residents to hazards associated with the release of hazardous

materials that are being transported through the CPU area. As future projects are submitted for review, site-specific studies will be required to determine the potential for impacts resulting from new development or redevelopment of existing sites, which have been identified on local, state or federal lists related to hazardous materials. Future project applicants would be required to consult with and obtain clearance from the County's DEH before subsequent development projects would be recommended for approval. Compliance with existing local, state, and federal regulations, General Plan and CPU policies and the Mitigation Framework identified in Section 5.6, would ensure that no direct or cumulative impacts related to Human Health/Public Safety/Hazardous Materials would result from implementation of the CPU.

6.3.7 Hydrology/Water Quality

Implementation of the CPU through the construction and operation of future projects could result in significant impacts on drainage patterns, water quality, flooding, and groundwater, and an increase in stormwater runoff within the study area.

Future projects within the CPU area would be required to comply with all NPDES permit requirements, including the development of an SWPPP if the disturbed area covers 1 acre or more or a Water Quality Control Plan if the disturbed area is less than 1 acre; utilize/follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment. In addition, adherence to the San Diego RWQCB NPDES requirements and the San Diego Bay and Tijuana River WURMP would help ensure operational compliance of future projects within the CPU area.

However, minimization of a direct impact does not necessarily guarantee that no additional cumulative impacts would occur. The potential exists that implementation of future development in the study area could have a cumulative impact on hydrology and water quality of the watersheds, including downstream problems with flooding, sizing of drainage facilities, erosion and sedimentation that is not avoided through implementation of local, federal and state regulations that require the implementation of storm water control facilities and BMPs.

Pursuant to the City's Storm Water Standards, future development would be required to implement construction, post-construction, and permanent BMPs in addition to hydromodification management to minimize water quality impacts both during the construction and operation phases. Future development projects would be required to enter into a Storm Water Management and Discharge Control Maintenance Agreement with the City to ensure the maintenance of the permanent BMPs. Future development would also be required to implement these mandated water quality protection measures and, through adherence to the City's NPDES permit, Standard Urban Stormwater Management Plan, and Stormwater Standards Manual, would prepare project-specific SWPPPs and implement

practices that would preclude significant water quality impacts. Implementation of these requirements would avoid potentially significant cumulative impacts.

The CPU contains goals and policies related to the provision of a reliable system of stormwater facilities to serve the existing and future needs of the community and as a means to minimize urban runoff and pollution. Because the CPU includes measures intended to minimize impacts to hydrology and water quality and future development would be required to adhere to the local, state and federal regulations, related to water quality, implementation of the Mitigation Framework provided in Section 5.7, Hydrology and Water Quality, including the requirement for all subsequent projects to prepare SWPPPs and Storm Water Mitigation Plans in accordance with local and state regulations would preclude the potential for cumulative impacts.

6.3.8 Geology/Soils

The General Plan PEIR concluded that projected population growth in the county and in the CPU area would increase the number of people potentially exposed to seismic and geologic hazards, specifically within the western and southern edges of the CPU that are identified as moderate to high geotechnical and relative risk area. Erosion rates would be accelerated by earthwork for new construction during buildout of the CPU. However, such impacts are site-specific and do not compound or increase in combination with projected development elsewhere in the county.

As discussed in Section 5.8, Geology/Soils, potential impacts to future development would be addressed through project-level analysis and the application of remedial measures identified in site-specific geotechnical investigations (when applicable), along with the Mitigation Framework specified in Section 5.8 of this PEIR. Additionally, adherence to the City's Grading Ordinance and conformance to building construction standards for seismic safety with the California Building Code satisfactory to the City Engineer would assure potential impacts would be less than significant. Therefore, future development implemented in accordance with the CPU would not result in a cumulatively considerable impact.

6.3.9 Energy Conservation

The study area for the energy conservation cumulative effects analysis is defined as the San Diego region. The CPU is projected to result in an increase in both population and energy consumption as compared to existing conditions and would contribute to a citywide cumulative increase in demand for both electricity and natural gas.

At a minimum, future development implemented in accordance with the CPU area would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code). Development would also be required to be in conformance with the General Plan and CPU policies, which

identify sustainability and energy efficiency design standards, including: environmentally oriented site design (CPU 4.9-1), environmentally conscious building practices (CPU 4.9-2, 4.9-3), sustainable landscaping techniques (CPU 4.9-4), and low impact development principles (CPU 4.9-5).

The CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the CPU, and construction-related energy impacts would be less than significant. Implementation of the CPU is not anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of the CPU state and local mandates for energy conservation, and the energy reduction measures set forth in the CPU policies, impacts associated with energy use would be less than significant. Therefore, through adherence to energy policies contained within state regulations and the CPU, future development implemented in accordance with the CPU would not contribute to a cumulatively considerable increase in energy related impacts.

6.3.10 Noise

The City's General Plan PEIR concluded that as the region develops in response to projected population growth, future residential, commercial, industrial, transportation, and public facilities projects would not only result in short-term construction-related noise impacts, but the operation of these projects would cumulatively increase ambient noise levels in the county. All jurisdictions have existing ordinances that dictate periods of construction to avoid significant impacts, and no cumulatively considerable noise impacts would result from construction activities.

Cumulative noise impacts would generally be associated with improvements to major regional transportation corridors and stationary sources such as industrial land uses. Sensitive receptors within the noise impact zone of major transportation corridors and significant stationary sources of noise could be exposed to noise levels in excess of applicable standards as a result. Future development within both the CPU and adjacent areas would generate increased noise levels associated with both transportation and stationary sources, which could exceed City standards.

The Noise Element of the General Plan includes specific policies pertaining to compatible land uses, and the CPU Noise Element provides additional polices for noise attenuation pertaining to new uses that would help protect people living and working in the CPU area, especially within areas of residential–industrial interface from an excessive noise environment. The residential–industrial interface would allow for the collocation of noise sensitive uses (i.e., residential) adjacent to noise generating commercial and industrial uses resulting in a cumulative increase in exposure of people to excessive noise levels.

As discussed in Section 5.10.3.2, exterior noise levels at uses adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road would exceed applicable noise standards. The incremental exposure of sensitive receptors to increased vehicular noise levels along major transportation corridors and within the vicinity of new residences, when viewed in connection with the increased number of trucks, buses, and trains along these corridors and new stationary sources associated with development elsewhere in the City and surrounding jurisdictions, would be cumulatively considerable.

Compliance with the goals, policies, and recommendations of the General Plan and CPU, along with federal, state, and local regulations would, in general, preclude impacts related to the incremental exposure of sensitive receptors to increased ambient noise levels along major transportation corridors and within the vicinity of new stationary sources. However, with buildout of the CPU, there is the potential for exposure of sensitive receptors to increased noise related to roadways and stationary sources, such as commercial and industrial operations. The CPU therefore, would contribute to a cumulatively considerable noise impact.

6.3.11 Paleontological Resources

The General Plan PEIR concluded that impacts to paleontological resources, similar to historical resources, would be cumulatively significant. For each future subsequent development project requiring mitigation, the General Plan PEIR identified site-specific measures detailed in the Mitigation Framework, which would reduce significant project-level paleontological resources impacts to less than significant.

As discussed in Section 5.11, Paleontological Resources, the majority of the CPU area overlies geologic formations assigned a high or moderate sensitivity rating. Based on the excavation activities associated with future development implemented in accordance with the CPU, there is a potential to impact subsurface paleontological resources. A Mitigation Framework consistent with the General Plan PEIR has been incorporated into this PEIR to reduce potential impacts to below a level of significance.

Future commercial, business park and industrial development applications for properties that are subject to the CPIOZ and that are consistent with the CPU zone regulations, and the supplemental CPIOZ regulations, and can demonstrate that no paleontological fossil resources are present on the project site; the project can be processed ministerially (CPIOZ Type A) and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources. Implementation of the CPIOZ would ensure consistency of all future development with CPU goals and policies. These policies and regulations are designed to reduce impacts to paleontological resources to below a level of significance. Therefore, the incremental contribution of impacts from grading activities in

high and moderate fossil-bearing formations would not be considered cumulatively significant.

6.3.12 Traffic/Circulation

Because the CPU would not result directly in the development of new or expanded uses, the analysis of potential impacts to transportation/circulation detailed within Section 5.12 is conducted at a program-level and reflects potential cumulative (i.e., Horizon Year 2030) impacts.

The traffic analysis is based on the inclusion of SANDAG's Mobility 2030 Plan, identified improvements to the regional transportation system, and the understanding that the La Media Road bridge crossing the Otay River Valley would not be constructed, as it has already been removed from the City of Chula Vista Facilities Financing Plan. Additionally, the traffic analysis is based on the approval of proposed road classifications included as part of the CPU (see Table 5.12-5).

Traffic thresholds for the CPU are presented in Section 5.12.2. If the CPU exceeds these thresholds, then the CPU would be considered to have a significant cumulative impact. A significant cumulative impact would also occur if the CPU would cause the LOS to degrade from D to E, even if the allowable increases are not exceeded.

Implementation of the CPU would increase the number of intersections and road or freeway segments operating at LOS E or F within the CPU area. As shown in Tables 5.12-6 and 5.12-7, the CPU would result in unacceptable LOS E or F operations for 24 roadway segments, and 49 intersections. These would be considered significant cumulative impacts.

Also under the "Horizon Year Plus CPU" conditions, five segments of SR-905 would be expected to operate at unacceptable levels of service (see Table 5.12-8), and five ramp meter locations would also experience a downstream freeway operation of unacceptable LOS E or F (see Table 5.12-9). These failures would be considered significant cumulative impacts of the CPU.

At the program-level, impacts would be reduced through the CPU's proposed roadway classifications and identification of necessary roadway, intersection and freeway improvements. With proposed mitigation, 24 roadway segments, 39 intersections, five freeway segments, and five freeway ramp meter locations would operate at unacceptable levels of service. Mitigation or construction of these improvements would be carried out at the project-level by future development and with implementation of Public Facilities Financing transportation projects. Funding would be either through construction by individual projects, or through fair share contributions to be determined at the project-level, or through payment of Facilities Benefit Assessment fees. While some CPU circulation impacts would ultimately be reduced to less than significant through project-level mitigation, the CPU, in conjunction with other past, present or future projects, as identified in

Section 5.12, would result in a significant cumulative impact. The CPU's contribution to the aforementioned impacts would be cumulatively considerable.

6.3.13 Public Services

The anticipated population growth within the CPU area would increase the demand for fire protection, police protection, schools, parks and recreation, and libraries. This demand, together with the demand from other development in the surrounding area, would result in a need for new or modified facilities. The construction of new or improved public services and facilities infrastructure could result in physical impacts to the environment.

The General Plan PEIR identified that a cumulatively significant impact exists relative to public services and facilities. Many agencies such as police and fire departments are party to agency sharing agreements in which agencies from one jurisdiction provide a public service to another jurisdiction under certain circumstances. In addition, some smaller school districts within the City serve students in other jurisdictions in the county. Therefore, impacts associated with the need for new or physically altered public services and facilities are cumulative in nature.

As discussed in Section 5.13, the City has planned for facilities that would adequately accommodate the projected growth of the CPU area. The construction of these facilities would most likely take place within the development footprint of the CPU and would be subject to independent environmental review at the time design plans are available. Consistent with the General Plan PEIR, for future subsequent development projects requiring mitigation, site-specific measures would be identified to reduce significant project-level incremental impacts associated with new construction of, or improvements to, public services and facilities infrastructure to less than significant. In addition, concurrent with adoption of the CPU, the PFFP provides a mechanism to ensure that the need for public facilities identified in the land use plan are funded through payment of DIF or fair share contribution by future project implemented in accordance with the CPU. As such, the CPU would not contribute to a cumulative impact.

6.3.14 Utilities

6.3.14.1 Water

The City PUD and OWD are responsible for water supply distribution with the CPU area. The City PUD's Otay Mesa service area was evaluated and reviewed in the Otay Mesa Master Plan Optimization Baseline Report, which recommended backbone infrastructure improvements to the City's PUD system. The OWD's water system model was updated in October 2008 as part of the 2008 WRMP and again in November 2010, as part of the 2010 WRMP Update. The improvements identified above from the City's Baseline Report would be required regardless, and are not necessitated by implementation of the CPU. The

addition of pumping capacity to the Otay Mesa pump station, which is necessitated by the CPU, would occur at an existing facility and would not result in significant new environmental impacts. The OWD has not identified any infrastructure improvements that are necessitated by implementation of the CPU. Future development within the City PUD Otay Mesa service area and OWD service area could result in additional demand for reclaimed water. However, water distribution facilities would be expanded pursuant to the City PUD's Otay Mesa Master Plan and the OWD's 2010 WRMP; therefore, no cumulative impacts associated with water distribution facilities would result.

6.3.14.2 Wastewater

The City PUD is responsible for wastewater service within the CPU area. Wastewater service to the CPU area is currently provided through the Otay Mesa sewer collection system, the OVTS system, and Metropolitan Sewerage System (Metro). The study area considered for the sewer utility cumulative effects analysis is, therefore, defined as service areas for the Otay Mesa sewer collection system, the OVTS and Metro.

Growth associated with buildout of the CPU would increase wastewater flows by 1.33 mgd over buildout of the adopted community plan, for a total projected wastewater generation of 9.68 mgd. This increase would trigger the need for the construction of additional sewer infrastructure, including an increase in the sizing of sewer pipelines. The 2004 OMTS Sewer Master Plan and 2009 Refinement Report identified these improvements as potentially required in future phases to accommodate wastewater generation associated with buildout of the CPU area. The additional wastewater transmission improvements identified within the reports would occur within existing utility line easements and facilities, and therefore, would not result in significant new environmental impacts. Future development within the study area would be served by improvements identified within the Master Plan. No cumulative impacts associated with waster transmission infrastructure would result from the CPU.

6.3.14.3 Reclaimed Water

Recycled water service in the CPU area is planned to be provided by the OWD. Therefore, the cumulative study area relative to reclaimed water is OWD's service area, which encompasses the CPU area and Eastlake to the north. OWD's 2008 WRMP evaluated ultimate recycled water supply, storage, and pumping conditions, which would be required within the service area. The OWD's 2010 WRMP Update incorporated demands projected under the CPU, and did not identify additional storage or pumping deficiencies beyond improvements recommended in the 2008 WRMP. The improvements identified above from the OWD's 2008 and 2010 WRMPs would be required regardless and are not necessitated by implementation of the CPU. The OWD has not identified any reclaimed water infrastructure improvements that are necessitated by implementation of the CPU. Future development within the OWD service area could result in additional demand for reclaimed

water. Recycled water facilities would be expanded pursuant to the OWD's 2010 WRMP; therefore, no cumulative impacts associated with reclaimed water would result.

6.3.14.4 Solid Waste

Buildout of the CPU area would generate solid waste through both demolition and construction, along with ongoing operations of existing and future land uses within the CPU area. Waste generated from the CPU area would most likely be disposed of at the Otay Landfill, which has adequate capacity through 2021. Other disposal options include the Sycamore or Miramar landfills. All landfills within the San Diego region are approaching capacity and are due to close within the next three to 20 years. The application of the City's Recycling Ordinance, solid waste storage ordinance and the Construction and Demolition Debris Diversion Deposit Program, along with adherence to the policies in the General Plan and CPU would continue to reduce solid waste generation and increase recycling efforts. However, as indicated in Section 5.14, regulatory compliance alone would only allow for a 40 percent diversion rate at the program-level. In order to meet with State-mandated 75 percent diversion requirements, additional measures for waste reduction would need to be identified at the project-level. Therefore, buildout of the CPU would increase the amount of solid waste, resulting in a cumulative impact relative to solid waste capacity and collection.

Future development implemented in accordance with the CPU that meet the City threshold would be required to prepare and implement site-specific solid waste management plans, which include measures to supplement regulatory compliance, and reduce significant project-level solid waste impacts to below a level of significance. However, even with strict adherence to the CPU policies, regulatory compliance in the Municipal Code and implementation of the Mitigation Framework detailed in Section 5.14, the CPU's contribution to solid waste impacts would be cumulatively considerable.

6.3.15 Water Supply

The SDCWA 2010 UWMP identifies a diverse mix of water resources projected to be developed through 2035 to ensure long-term water supply reliability for the county, including the identification of alternative water supply sources to alleviate the risk of unforeseen water shortages. As discussed in Section 5.15, water demand associated with accelerated forecasted growth is intended to account for a portion of SANDAG's residential land use development currently projected to occur between 2035 and 2050. However, this demand has the potential to occur on an accelerated schedule. Under this model, the difference between the planned and proposed water demands of the CPU is accounted for in the SDCWA 2010 UWMP.

The CPU area is served by both the City PUD and the OWD. The WSAs prepared for the proposed CPU concluded that the CPU would be consistent with the water demands assumptions included in the regional water resource planning documents of the SDCWA

and MWD. Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, OWD, the SDCWA and MWD to serve the projected demands of the CPU area, in addition to existing and planned future water demand of the County. No cumulative impact exists, and no cumulatively considerable impact would occur from implementation of the CPU.

6.3.16 Population and Housing

The study area considered for the population and housing cumulative impact analysis is defined as the region. The increase in housing supply proposed by the CPU would implement the housing goals of SANDAG's RCP and the General Plan Housing Element, not only in terms of quantity, but also diversity and location of residentially designated land. Buildout of the CPU area would contribute a projected maximum net increase of 6,374 dwelling units to the housing stock within the City and region. The increase in housing stock would accommodate the projected growth in population in the region and is consistent with the adopted General Plan and smart growth principles in that the higher residential density communities within the CPU area would be located close to transit, served by existing public infrastructure, and close to major urban amenities and jobs. Therefore, no significant cumulative impacts would result.

6.3.17 Agriculture/Mineral Resources

6.3.17.1 Agriculture

As discussed in Section 5.17, Agriculture/Mineral Resources, buildout of the CPU would convert 180 acres of Farmland of Statewide Importance as well as 28 acres of Unique Farmland to non-agricultural uses. In conjunction with buildout of other communities in the region, including development in the unincorporated areas, the CPU would result in a countywide loss of agricultural land, resulting in a significant cumulative impact.

Farmland within the CPU area is not contiguous and is currently surrounded by urban land uses and MHPA lands. Production associated with agricultural operations in the CPU area is not significant in terms of countywide agricultural value and agriculture is designated as interim use pending future development in the adopted Community Plan (1981). Of the 3,900 acres listed in the adopted Community Plan, 306 acres are currently still under agricultural production within the CPU area (SANDAG 2009). This represents only a tenth of one percent (0.1 percent) of the total acreage under cultivation within the county. A conversion of this amount would not be considered a significant agricultural loss. Because the CPU allows the interim use of the 306 acres currently under production, and because the loss of this acreage is not regionally significant to agricultural production, the loss would not be cumulatively considerable.

6.3.17.2 Mineral Resources

As discussed in the City's General Plan EIR, development associated with future population growth in San Diego County could result in adjacent incompatible land uses that impact the extraction of mineral resources. Also, a balancing of implementation of General Plan goals and policies addressing habitat and open space preservation and mineral extraction may lead to the loss of access to significant mineral resources. In general, implementation of General Plan policies and compliance with federal, state, and local regulations would preclude mineral resources impacts.

As discussed in Section 5.17, Agriculture and Mineral Resources, "regionally significant" MRZ-2 aggregate resource areas exist within the northwest portion of the CPU area. While implementation of the CPU would result in the loss of mineral resources, it would not represent a loss of value to the region because this area is developed or planned to be developed as identified in the adopted 1981 Community Plan. Therefore, access to areas of significant aggregate within the CPU area are already restricted, which reduces the likelihood of extraction of those resources. Furthermore, the surrounding residential and commercial development in close proximity to this area would not be compatible with the extraction processes. When considering past, present, and future development in the region, implementation of the CPU would not result in a cumulatively considerable impact to mineral resources.

6.3.18 Greenhouse Gas Emissions

Greenhouse gas emissions are a cumulative concern on the global level and are generally regulated through state-wide legislation. For the purposes of the CPU, the study area for cumulative GHG emissions modeling is consistent with that of the traffic analysis. The boundary of the study area includes the CPU area and extends to those areas outside the CPU area, to roads that are common to other communities in the City of San Diego and other jurisdictions, such as the City of Chula Vista and the County of San Diego.

Section 5.18, Greenhouse Gas Emissions, provides a discussion of whether implementation of the CPU would generate GHG emissions, either directly or indirectly, that would have a significant cumulative impact on the environment. The section also analyzes the issue of whether the CPU's GHG emissions, with incorporation of GHG-reducing regulations and design features, would achieve a 28.3 percent or greater reduction relative to the CPU's BAU GHG emissions. Specific emission levels associated with vehicle use, energy use, area source emissions, water use, solid waste, and construction emissions are identified in Section 5.18.4.1a through 5.18.4.1g of the PEIR.

As shown in Table 5.18-6, the CPU GHG emissions, when compared to the BAU annual emissions, would result in an 11.4 percent reduction in GHG emissions relative to BAU. This falls short of meeting the City's requirement to achieve a minimum 28.3 percent reduction in

GHG emissions relative to BAU. The CPU Mobility, Urban Design, and Conservation elements include specific policies aimed at decreasing vehicle use and increase energy efficiency; however, these cannot be quantified in terms of their GHG emissions reductions at the program-level, and the GHG emissions generated from CPU buildout, in conjunction without other local GHG emissions sources, would be cumulatively significant. While future development implemented in accordance with the CPU would be required to incorporate GHG emission reduction measures to the extent practicable, the CPU would fail to reduce its GHG emissions from BAU by a minimum of 28.3 percent, and therefore, the CPU's contribution to GHG emissions would be cumulatively considerable.

7.0 Growth Inducement

Pursuant to the 2012 CEQA Guidelines Section 15126.2 (d), an EIR shall "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment…it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." According to the City's 2011 Significance Determination Thresholds, growth inducement:

> … is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly which may result in the construction of major and new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment.

In addition, the Thresholds state that "the analysis must avoid speculation and focus on probable growth patterns or projects" (City of San Diego 2011d).

As previously discussed in Section 5.16, according to SANDAG, there were an estimated 15,323 residents in 2012 in the CPU area (SANDAG 2012b). By 2030, this population is projected to increase to 46,392; and to 65,368 by 2050 (SANDAG 2010b). Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. In accordance with the framework and policies in the City's General Plan, future population growth would be accommodated primarily in existing urbanized areas or mixed-use villages.

The General Plan is based on the previously adopted City of Villages strategy. Under this strategy, a "village" is a place where residential, commercial, employment, and civic uses are present and integrated. The City of Villages strategy addresses the need for redevelopment, infill, and new growth in compact, mixed-use activity areas that are pedestrian-friendly, centers of community, and linked to the regional transit system. Implementation of the City of Villages strategy relies upon the future designation and development of village sites through comprehensive community plan updates. This strategy, as implemented through the General Plan goals and policies, is designed to provide a framework to manage and plan for future population growth in the City.

The CPU incorporates the City of Villages strategy by designating residential, village center and commercial, and most open space and park areas in the western portion of the CPU

area. The community village concept draws upon the character and strength of the CPU's mixed-use settings and commercial centers. This western portion of the CPU area is planned to be comprised of vibrant pedestrian neighborhoods with enhanced connectivity. Additionally, CPU policies direct housing growth to areas suitable for residential use, buffered from industrial uses.

The CPU would also provide guidance for orderly growth and development in accordance with smart growth principles. Through the placement of higher density residential development in areas in and around transit and commercial corridors, the CPU would create mixed-use urban environments that support transit and pedestrian activity. A PFFP is being prepared concurrently with the CPU to allow for the maintenance and improvements in infrastructure capacity and public services to coincide with future development. Other potential environmental impacts associated with population growth in the CPU area (e.g., transportation/traffic, air quality, noise, GHG emissions) are addressed in the relevant sections of this PEIR.

SANDAG population projections prepared for the CPU area indicate that population would increase over time, regardless of whether the CPU is approved. As shown in Table 5.16-3, the CPU would result in an increase of approximately 6,374 residential dwelling units as compared to the adopted community plan and almost 14,500 additional units above existing. While planning for increased population growth within the CPU area, the Economic Prosperity Element of the CPU aims to maintain the vital role of the CPU area in the economic prosperity for the entire San Diego and U.S./Mexico border region due to activities generated at the Otay Mesa POE and additional base-sector industries. In order to accomplish this, the CPU includes land use planning principles, as well as goals and policies intended to protect, preserve, and expand the Prime Industrial Land designation in the eastern portion of the CPU area. Policies are intended to encourage the development of existing and emerging technology-based industries on these Prime Industrial Lands.

Overall, the CPU provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist.

8.0 Effects Found Not to Be Significant

Pursuant to CEQA Guidelines Section 15128, based upon initial environmental review, the City determined that the CPU would have the potential to result in adverse effects on all environmental issue areas and called out as such in the Notice of Preparation distributed in 2010. While each of the environmental issue areas are further discussed in Chapter 5.0, Environmental Analysis of this PEIR, during the course of evaluating potential impacts and developing polices to be adopted with the CPU, the following issue areas were determined not to be significant and therefore, no mitigation would be required:

- Land Use (Land Use Plan Conflicts, Land Use Compatibility, Brush Management, MSCP Specific Management Directives for Otay Mesa)
- Visual/Aesthetics (Public Views, Compatibility, Landform Alteration, Unique Physical Features)
- Air Quality (Plan Consistency, Sensitive Receptors (Hot Spot and Particulate Matter), Odors)
- Human Health/Public Safety/Hazardous Materials (Hazardous Substances)
- Energy Conservation
- Noise (Airport noise)
- Transportation/Circulation (Traffic Hazards, Circulation and Access, and Alternative Transportation)
- Public Services (Fire, Police Services, Schools, Parkland, and Libraries)
- Public Utilities (Water, Wastewater, Reclaimed Water, Storm Water Infrastructure Communication systems)
- Water Supply
- Population/Housing (Population Growth, Affordable Housing)
- Agricultural/Mineral Resources

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9.0 Significant Unavoidable Environmental Effects/Irreversible Environmental Changes

9.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the PEIR. For the CPU, transportation/circulation (capacity), utilities (solid waste), air quality (criteria pollutants, sensitive receptors), greenhouse gas emissions, and noise (traffic, stationary sources and construction) would remain significant and unavoidable effects of the CPU (refer to Section 5 of this PEIR for further detail). All other significant impacts identified in Section 5, Environmental Analysis, of this PEIR can be reduced to below a level of significance with implementation of the Mitigation Framework identified in Section 5 and in the Mitigation Monitoring and Reporting Program contained within Section 11 of this PEIR as well as through compliance with adopted General Plan and CPU policies.

9.2 Significant Irreversible Environmental Changes Which Would Be Caused by the Proposed Project Should It Be Implemented

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should the CPU be implemented. Irreversible changes typically fall into three categories:

- Primary impacts such as the use of nonrenewable resources (i.e. biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Primary and Secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with the CPU.

Section 15126.2(c) of the State CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the CPU would not result in significant irreversible impacts to biological resources, agricultural land, mineral deposits, water bodies, energy resources or historical resources. Although sensitive biological resources are identified throughout the CPU area which would be impacted with future development, direct and indirect impacts can be offset through strict compliance with CPU policies, regulatory compliance (CPIOZ) and the Mitigation Framework identified in EIR for biological resources. Historical resources are mainly concentrated in the southern portion of the CPU. Future development has the potential to impact archaeological sites recorded across this area of the CPU; however, these potential impacts can be mitigated through strict adherence to the CPU policies, regulatory compliance (CPIOZ) and implementation of the Mitigation Framework further detailed in Section 5 of the EIR.

While the Otay Mesa area includes agricultural land uses, the community has planned for the conversion of agricultural lands to more intensive residential, commercial and industrial uses. As further described in Section 5 (Environmental Analysis) of the EIR, the loss of any remaining agricultural land uses in the CPU would not constitute a significant adverse effect. The same would hold true for mineral resources within the CPU. The loss of mineral resources would be the result of conversion of undeveloped land to more intensive uses, thereby eliminating the potential for extraction activities. However, only a small area within the northwestern portion of the CPU contains regionally significant aggregate resources (MRZ-2). These resources are mapped in a portion of the CPU area where development currently exists or where entitlements have already been approved for future development. Therefore, access to these areas of significant aggregate is already restricted, which precludes the likelihood of extraction of those resources. Furthermore, the surrounding residential and commercial development in close proximity to this area would not be compatible with the extraction processes.

Otay Mesa is an area which has been planned for growth and is currently accessible via regional transportation facilities (e.g., I-805, SR-905, and SR-125). Access would be enhanced through improvements to community plan roads which link to surrounding areas. Surrounding land under jurisdiction of the City of Chula Vista and the County is also planned for future growth with similar land uses. Therefore, the CPU would not have a significant irreversible commitment to unplanned land use.

However, future development of the CPU area would represent a long-term commitment to a more intensive land use. Therefore, implementation of the CPU would involve an irreversible commitment to the use of non-renewable resources in the form of water, natural gas, and electricity.

Construction of future development implemented in accordance with the CPU would require consumption of non-replenishable resources, or resources which may renew slowly. These resources would include certain types of lumber and other forest products; aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone); metals (e.g., steel, copper and lead); petrochemical construction materials (e.g., plastics, asphalt); and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment, as well as in lighting, heating, cooling, and other operational uses of future development and transportation of people to/from and within the community. As described throughout the PEIR, the CPU includes policies aimed at improving energy efficiency, reducing water use, and minimizing impacts on other natural resources. The CPU policies also build upon sustainability principles, which would reduce energy consumption. For example, the CPU village concept would reduce dependence on fossil fuel energy sources by integrating housing units in close proximity to employment centers and along transit corridors. These policies would serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation.

With respect to environmental accidents potentially associated with the CPU and as further discussed in the EIR, although the Hazardous Materials Technical Study (HMTS) identified 23 sites of potential environmental concern located within the CPU area only six (6) were considered potentially significant. Within the CPU, the risk for wildfires is highest in areas of natural, unmaintained open space, and as development occurs adjacent to these areas the risk increases. The City operates Brown Field Municipal Airport in the north-central portion of the CPU. This airport provides business, corporate, training, and charter aviation services that support commercial and industrial activities within the region. Air traffic in and out of Brown Field is controlled by the FAA, and land uses associated with airport operations are covered in an adopted ALUCP. Based on the analysis provided in Section 5.6, although conditions exist within the CPU associated with hazardous materials, risk of wildfires, and aircraft operations, the CPU contains policies and a Mitigation Framework intended to assure compliance with regulatory requirements which would reduce the potential for environmental accidents.

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10.0 Project Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. The alternatives selected for comparison should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

The alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the CPU;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the CPU;
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (Section 15126.6[e]).

As discussed in Section 5, the CPU would result in significant, direct, and/or cumulative environmental impacts related to land use, air quality, biological resources, geology/soils, historical resources, human health/public safety/hazardous materials, noise, paleontological resources, traffic/circulation, utilities, and greenhouse gas emissions. In developing the alternatives to be addressed in this section, consideration was given regarding their ability to meet the basic objectives of the CPU and eliminate or substantially reduce significant environmental impacts (as identified in Sections 5 and 6 of this PEIR).

The following specific objectives for the CPU support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate

in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the CPU are to:

- **Regional Center**: Enhance Otay Mesa's role as a bi-national regional center.
- **Economic Diversification**: Broaden the economic profile to increase employment and growth opportunities.
- **Industrial Capacity**: Enhance and sustain Otay Mesa's strong economic base and potential for expansion.
- **International Trade**: Support activities that promote greater interregional and bi-national activities.
- **Housing:** Provide more and varied housing and meet workforce needs close to employment centers.
- **Complete Places**: Create balanced, integrated mix of uses in Otay Mesa while minimizing collocation compatibility issues.
- **Transit:** Coordinate land use planning with high frequency transit service planning.
- **Open Space**: Protect the canyon lands and sensitive biological resources while providing recreational opportunities.
- **Infrastructure:** Include financing mechanisms that can secure infrastructure improvements concurrent with development.
- **Environmental Leadership and Sustainability:** Follow environmentally sensitive design and sustainable development practices.

The above objectives are specific to the Otay Mesa planning area, and are intended to implement the broader goals, policies, and Guiding Principles of the General Plan. Following are the Guiding Principles of the General Plan.

- An open space network formed by parks, canyons, river valleys, habitats, beaches and ocean;
- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High-quality, affordable, and well-maintained public facilities to serve the City's population, workers, and visitors:
- Historic districts and sites that respect our heritage;

- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and
- A high aesthetic standard.

This section identifies one alternative that was eliminated from further consideration and reasons for dismissal, and analyzes a No Project Alternative, the Reduced Biological Impacts Alternative, and the Reduced Density Alternative in comparison to the potential environmental impacts associated with the CPU. Each major issue area included in the detailed impact analysis of this PEIR has been given consideration in the alternative analysis. A summary comparison of the No Project Alternative, the Reduced Biological Impacts Alternative, and the Reduced Density Alternative, with the CPU is included in Table 10-1, below.

As required under Section 15126.6 (e)(2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project.

10.1 Alternatives Considered but Rejected

An alternative was considered where all vernal pools and vernal pool species would be conserved. In order to ensure the long-term viability of the vernal pools and species, conservation of associated watersheds and sufficient buffers would also be required. While this alternative would significantly reduce impacts to vernal pool resources and the surrounding non-native grasslands, this alternative was rejected because the ability to provide a neighborhood village within the Southwest Specific Plan area would be severely constrained.

Due to the scattered location of the vernal pool resources within the Southwest Specific Plan area, the available development area would not result in compact development, but would separate out exclusive development areas without an integrated circulation pattern or open space system. Benefits of the village areas such as but not limited to compact development, multi-model transportation networks and mixed-use development opportunities as further described below, would not be realized. In addition, the following goals and objectives of the General Plan and CPU for this area would not be achieved:

- Diverse residential communities formed by the open space network;
- Compact walkable mixed-use villages of different scales within communities;
- Integrated regional transportation network of walkways, bikeways, transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- Distinct villages that include places to live, work and recreate;
- Require a mixed-use residential/commercial component to be included within village core areas, with neighborhood-serving commercial uses such and food markets, restaurants, and other small retail shops.

10.2 Alternatives Considered

This EIR evaluates three alternatives to the CPU: (1) No Project Alternative; (2) Reduced Biological Impacts Alternative; and (3) Reduced Density Alternative.

Descriptions of each alterative and their impacts are provided below. Also, Table 10-1 provides a side-by-side comparison of the potential impacts of the alternatives to the impacts of the CPU.

TABLE 10-1
MATRIX COMPARISON OF THE CPU AND PROJECT ALTERNATIVES

Environmental Issue Area	CPU	No Project/Adopted Plan	Reduced Biological Impacts Alternative	Reduced Density Alternative
Land Use	SM	Same as CPU	Less than CPU	Less than CPU
Landform Alteration/Visual Quality	LS	Greater than CPU	Less than CPU	Same as CPU
Air Quality	SU - (Criteria Pollutants, Sensitive Receptors - Stationary Sources/Collocation)	Greater than CPU	Less than CPU	Less than CPU
Biological Resources	SM	Greater than CPU	Less than CPU	Same as CPU
Historical Resources	SM	Greater than CPU	Less than CPU	Same as CPU
Human Health/ Public Safety/ Hazardous Materials	SM	Same as CPU	Greater than CPU	Less than CPU
Hydrology/ Water Quality	SM	Greater than CPU	Less than CPU	Same as CPU
Geology/Soils	SM	Same as CPU	Same as CPU	Same as CPU
Energy Conservation	LS	Same as CPU	Less than CPU	Less than CPU
Noise	SU - (Traffic, Stationary Sources and Construction only)	Stationary sources: Less than CPU; Traffic noise: Greater than CPU.	Less than CPU	Less than CPU
Paleontological Resources	SM	Greater than CPU	Less than CPU	Same as CPU
Traffic/Circulation	SU(Capacity)	Greater than CPU	Less than CPU	Less than CPU
Public Services	LS	Same as CPU	Same as CPU	Same as CPU
Utilities	SU (Solid Waste)	Same as CPU	Same as CPU	Same as CPU
Water Supply	LS	Same as CPU	Same as CPU	Same as CPU
Population and Housing	LS	Same as CPU	Same as CPU	Same as CPU
Agriculture /Mineral Resources	LS	Same as CPU	Same as CPU	Same as CPU
Greenhouse Gas Emissions	SU - (Plan Consistency; GHG Emissions)	Greater than CPU	Less than CPU	Less than CPU

LS = less than significant; SM = significant and mitigated; SU = significant and unavoidable

10.2.1 No Project Alternative (Adopted Community Plan)

Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), the No Project Alternative represents the continued implementation of the adopted 1981 Otay Mesa Community Plan as shown on Figure 10-1, including amendments to the plan as further described in Table 10-2, which more accurately reflects the current conditions of the community planning area.

TABLE 10-2
UPDATES TO ADOPTED COMMUNITY PLAN

- The MHPA boundary was provided by MSCP staff and reflects the City's adopted MSCP Subarea Plan and MHPA (1997) and subsequent MHPA boundary line adjustments have occurred as part of prior discretionary project approvals.
- Freeway alignments and ROW limits for SR-905 and SR-125 were incorporated.
- The extent of residential land use designations was modified to reflect the actual limits of existing development (using aerial photograph to determine the edge of development).
- The development area on the northern edge of Brown Field was extended in one location based on existing development patterns.
- The industrial area at the northwest corner of Brown Field was extended.
- The MHPA boundaries along the western edge of the industrial development was corrected to reflect the actual limits of development and conserved open space consistent with the approved International Business Center project (EQD No. 86-0536).
- The existing fire station at the northeast corner of Otay Mesa Road and La Media was incorporated.
- Changes to school/park sites were incorporated as follows:
  - i. The high school site was reconfigured/relocated based on the actual development area for San Ysidro High School.
  - ii. The community park south of SR-905 where the high school now exists was relocated to the Beyer Athletic Area in the adjacent San Ysidro community. This approximately 20-useable-acre community park would satisfy 15 acres of community park requirements in the Otay Mesa community and 5 acres of neighborhood park requirements in the San Ysidro community.
  - iii. The boundaries of the community park, school site, and medium-high residential area located north of SR-905 was revised to reflect the actual boundaries of the school and park.
  - iv. The school site east of the community park (north of SR-905) was designated as a combined elementary/junior high school based on its current configuration as a K-8 school and the potential for it to become a junior high school when the elementary school to the west of the community park is constructed.
  - v. The elementary school and portions of the very low and low-medium density residential area designated south of Old Otay Mesa Road was deleted and designated as open space.

Map Source: City of San Diego Planning Department

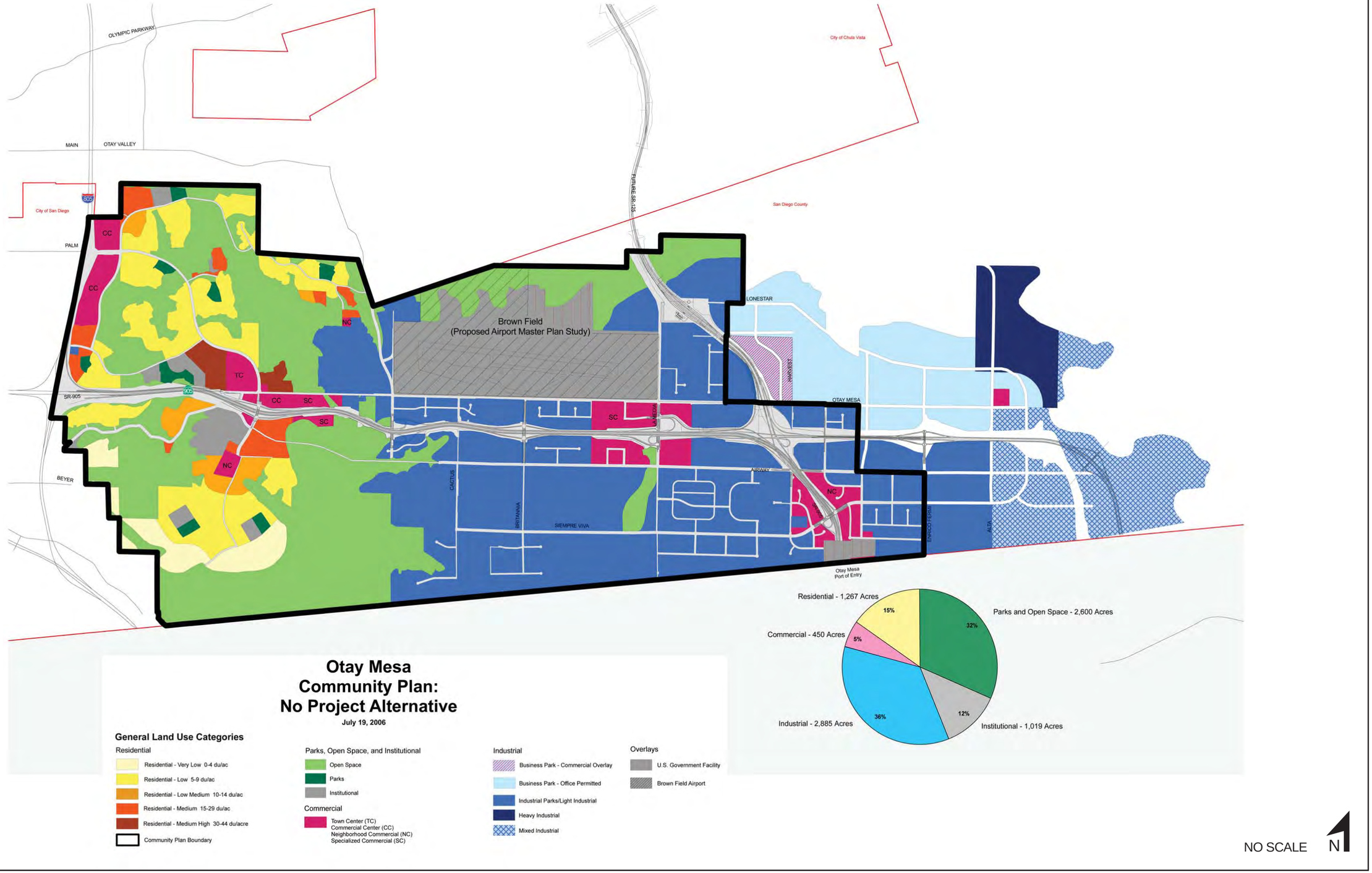

FIGURE 10-1
Concept of the No Project Alternative

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Buildout projections for the No Project Alternative compared to the CPU are shown below in Table 10-3.

TABLE 10-3
COMPARISON OF NO PROJECT ALTERNATIVE WITH CPU

Land Use Categories	Adopted Community Plan as modified (No Project Alternative)[1]	CPU[2]
Residential	1270 ac/ 12,400 du	802 ac/ 18,774 du
Commercial	453 ac/ 5,776,000 sq. ft.[4]	302 ac/ 3,917,000 sq. ft.[4]
Village Centers	0	560 ac
Industrial	2,839 ac/ 64,465,000 sq. ft.[4]	2,510 ac/ 54,461,000 sq. ft.[4,5]
Institutional	1,023 ac	1,120 ac
Parks	53 ac	151 ac
Open Space	2,565 ac	2,833 ac
Right-of-Way	1,099 ac	1,023 ac
ADT	1,165,103[4]	1,045,025[4]
TOTAL	9,319ac[3]	9,302 ac

[1]SOURCE: City of San Diego Otay Mesa Community Plan Update, April 2011 Public Draft
[2]SOURCE: City of San Diego Draft CPU Land Use Map, September 10, 2013
[3]Acreage discrepancy due to mapping limitations
[4]SOURCE: Urban Systems. Transportation Analysis for the OMCPU, June 2012
[5]Industrial Uses under the CPU include Heavy and Light industrial, I+BT and Business Park land use categories
ac = acre; du = dwelling unit; sq. ft. = square feet.

Compared to the CPU, the No Project Alternative would have lower density of residential land use per acre while allowing for more industrial land use per acre. A total population of 46,392 people would be projected for an assumed buildout year (2032) under this alternative with approximately 12,400 dwelling units permitted under the adopted plan. The general distribution of land uses in the No Project Alternative would have residential uses on the west and industrial uses in the central-eastern areas. The residential uses on the west would be comprised of conventional suburban development, while the industrial uses on the east would mainly include labor intensive manufacturing, warehousing, and distribution, with only limited office uses.

An issue-by-issue comparison of the No Project Alternative and the CPU is presented below.

10.2.1.1 Land Use

As residential and industrial lands uses would be primarily segregated with the No Project Alternative, potential impacts associated with the adjacency of residential and industrial uses would be avoided. However, some beneficial features of the CPU would not occur. These include the integration of village centers along transportation corridors, creation of Community and Neighborhood Villages, and the inclusion of new specific land use designations (e.g., International Business and Trade and Business Park – Residential Permitted). As such, the goals and objectives of both the CPU and the General Plan would

not be achieved. Moreover, this segregation of land uses would not be as conducive to high-frequency transit service and could present obstacles to the future construction of supporting infrastructure. Overall, the No Project Alternative would provide less open space and fewer acres of parkland than the CPU, as industrial development would occur on both sides of SR-125 in the northeastern portion of the CPU area.

Despite the differences in future development patterns when compared to the CPU, the No Project Alternative would also require compliance with both the ESL and Historical Resources Regulations of the LDC, along with the MHPA Land Use Adjacency Guidelines, which includes site-specific review at the project-level. Therefore, as with the CPU, while the No Project Alternative would result in potentially significant impacts to resources covered under these regulations, these impacts can be reduced to below a level of significance with mitigation at the project-level.

10.2.1.2 Landform Alteration/Visual Quality

Within the primarily developed western third of the CPU area, the No Project Alternative would result in roughly the same visual quality impacts as the CPU. This is because the residential land use patterns in the No Project Alternative would be similar to the CPU, although more open space would be provided under the CPU within the Southwest District as compared to the No Project Alternative. However, unlike the CPU, the No Project Alternative would not introduce new residential and additional commercial components within the eastern industrial areas and would not result in an integrated community with respect to design and community character; Additionally, Urban Design polices developed for the CPU would not be envisioned under the No Project Alternative, and therefore from an overall visual perspective of the built out community, the aesthetic impacts would be greater than anticipated for the CPU.

10.2.1.3 Air Quality/Odor

Overall, the No Project Alternative would result in less integration of jobs and housing and generate more vehicle trips when compared to the CPU. In addition, under the No Project Alternative, village centers with transit stations would not be created. As such, the goals of reducing trips and air emissions contained in the General Plan would not be achieved under the No Project Alternative.

The No Project Alternative would be consistent with the RAQS and SIP, because no changes in land use would occur. The CPU would not be consistent with the adopted community plan land use designations upon which the RAQS and SIP were based; however, the changes in the land uses under the CPU and the reduced traffic generated under the CPU would result in fewer emissions than the No Project Alternative. Neither the No Project Alternative nor the CPU would obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP, and impacts would be less than significant for both.

Impacts associated with both construction and operational emissions of criteria pollutants under the No Project Alternative would be greater than those identified for the CPU. The No Project Alternative would include a greater number of industrial uses (stationary emission sources), more truck traffic (diesel emissions), and a greater ADT volume than the CPU. Therefore, under the No Project Alternative, total ROG, NO_x, CO, SO, PM_{10} and $PM_{2.5}$ emissions would be greater than emissions under the CPU. By comparison, the No Project Alternative would result in greater impacts than the CPU relative to air quality/odor.

10.2.1.4 Biological Resources

Because the amount of preserved open space would be less, the No Project Alternative would result in greater impacts to biological resources than those anticipated under the CPU. As with the CPU, implementation of the No Project Alternative would also be required to adhere to all applicable federal, state, and local regulations regarding the protection of biological resources, as described in Section 5.4, for all subsequent development project submittals. Under this alternative, future applicants would not have the opportunity to provide documentation under a ministerial process demonstrating that no impacts to biological resources would occur and therefore, similar requirements for project-specific biological analysis in accordance with the ESL Regulations and Biology Guidelines, as outlined in the CPU Mitigation Framework would apply in either case. Therefore, impacts under this alternative would be similar, but slightly greater than those identified for the CPU because less developable land would be converted to open space and development patterns would remain as they are today

10.2.1.5 Historical Resources

Historical and prehistoric resources (see Table 5.5-1), are known to exist within the CPU. Therefore, future development (and associated grading) has the potential to result in significant direct and/or indirect impacts to historical resources for both the No Project Alternative and the CPU. As with the CPU, because development would still be allowed in accordance with existing zoning under a discretionary review process, implementation of this alternative would require future projects to adhere to all applicable federal, state, and local regulations regarding the protection of historical resources, as described in Section 5.5, along with the identified mitigation framework, which would be applied at the project-level. However, although impacts to historical resources under this alternative would be similar to the CPU, unlike the CPU, the No Project Alternative does not provide a mechanism for ministerial review under a CPIOZ Type A at the project-level to demonstrate that no historical resources are present on the site. All projects under this alternative would be subject to discretionary review which includes evaluation in accordance with the Historical Resources Regulation and Guidelines, and would be required to provide applicable mitigation for potential impacts to a significant resource. The extent of impacts to historical resources resulting from implementation of the No Project Alternative would be similar, but slightly greater than those identified for the CPU because less land would be preserved in

open space under this alternative and development patterns would remain as they are today and would be subject to future grading.

As with the CPU, implementation of this alternative would require future projects to adhere to all applicable federal, state, and local guidelines and regulations related to historical resources, as described in Section 5.5, along with the identified mitigation framework, which would be applied at the project-level and therefore would not result in a significant impact.

10.2.1.6 Human Health/Public Safety/Hazardous Materials

As discussed in Section 5.6–Human Health/Public Safety/Hazardous Materials, implementation of the CPU could be subject to hazards from the presence of hazardous materials that would be encountered during future grading and/or construction-related activities. Additionally, because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. However, under both the CPU and the No Project Alternative, all projects would be required to comply with the Brush Management Regulations and Landscape Standards of the LDC and any other applicable requirements conditioned on project approval by the City Fire Marshal, and therefore would preclude the potential for impacts under both the No Project Alternative and the CPU.

Because the No Project Alternative would segregate residential land use from industrial uses to a greater extent than under the CPU, the risk of exposure to hazardous materials would be less. However, the No Project Alternative designates more industrial acreage than the CPU, which would result in a potential for increase in the use of hazardous materials under the No Project Alternative. Hazardous materials impacts would require similar mitigation for new development through compliance with all applicable federal, state, and local regulations regarding hazardous materials siting, assessment, and remediation and would preclude the potential for impacts under both the No Project Alternative and the CPU.

10.2.1.7 Hydrology and Water Quality

Although the land use pattern and distribution for the No Project Alternative differs from the CPU, the area to be developed is roughly similar. Less open space would be preserved under the No Project Alternative when compared to the CPU; therefore, this alternative would result in slightly greater impacts associated with hydrology, flooding and water quality. Future development would be required to comply with existing federal, state and local regulations relative to runoff and water quality at the project-level which would preclude the potential for impacts under both the No Project Alternative and the CPU.

10.2.1.8 Geology/Soils

Impacts to geology and soils resulting from implementation of the No Project Alternative would be similar to those identified for the CPU. As with the CPU, implementation of the No Project Alternative has the potential to result in significant impacts related to geologic hazards. Future development would be exposed to geological hazards associated with unstable conditions related to compressible soils, landslides, seismicity (faults), and expansive soils. Future development under both the No Project Alternative and the CPU would be required to comply with existing federal, state and local regulations relative to engineering and construction which would preclude the potential for impacts under both the No Project Alternative and the CPU.

10.2.1.9 Energy Conservation

Development under the No Project Alternative would result in an energy demand of about 821 million kilowatt hours per year (kWh/yr) for electricity and 1.18 billion thousand British Thermal Units (kBTU) per year of natural gas which would be greater than the demand associated with the CPU, which would result in an energy demand of approximately 772 million kilowatt hours per year (kWh/yr) and 1.15 billion kBTU per year of natural gas. Similar to the CPU, the No Project Alternative would not result in the use of excessive amounts of fuel or other forms of energy during construction. Also, the adopted plan, like the CPU, is not anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of both the CPU and No Project Alternative, impacts associated with energy use would be similar and less than significant.

10.2.1.10 Noise

The CPU would result in significant unavoidable impacts due to stationary and traffic noise sources. Noise impacts resulting from implementation of the No Project Alternative would be incrementally less than those identified for the CPU relative to stationary noise sources. Fewer areas of collocation would occur under the No Project Alternative and, therefore, the potential for noise sensitive land uses to be exposed to excessive noise would be less than under the CPU. Additionally, the residential and industrial land uses would be segregated to a greater extent under the No Project Alternative, thereby decreasing the exposure of noise sensitive users.

Implementation of the No Project Alternative would result in greater traffic volumes resulting in more traffic noise when compared to the CPU. Therefore, existing sensitive receptors may experience greater noise impacts from transportation-related noise sources under the No Project Alternative. While noise impacts of this alternative would be somewhat less than the CPU for stationary sources and somewhat greater for traffic sources, overall impacts would remain significant and unavoidable for this alternative as with the CPU.

10.2.1.11 Paleontological Resources

Paleontological fossil resources within high and moderate geological formations are known to exist within the CPU area. Therefore, future development has the potential to result in significant direct impacts for both the No Project Alternative and the CPU. As with the CPU, because development (and associated grading) would still be allowed in accordance with existing zoning under a discretionary review process, implementation of this alternative would require future projects to evaluate the potential for impacts in accordance with the Paleontological Guidelines, along with the identified mitigation framework, which would be applied at the project-level. However, although impacts to paleontological resources under this alternative would be similar to the CPU, unlike the CPU, the No Project Alternative does not provide a mechanism for ministerial review under a CPIOZ Type A at the project-level to demonstrate that no paleontological resources are present on the site. All projects under this alternative would be subject to discretionary review which includes evaluation in accordance with the Paleontological Resources Guidelines, and would be required to provide applicable mitigation for potential impacts to a significant resource when a significance threshold is exceeded, The extent of impacts to paleontological resources resulting from implementation of the No Project Alternative would be similar, but slightly greater than those identified for the CPU because less land would be preserved in open space under this alternative and development patterns would remain as they are today and would be subject to future grading.

As with the CPU, implementation of this alternative would require future projects to adhere to all applicable federal, state, and local guidelines related to paleontological resources, as described in Section 5.11, along with the identified mitigation framework, which would be applied at the project-level and therefore would not result in a significant impact.

10.2.1.12 Traffic/Circulation

Impacts associated with the No Project Alternative are addressed in the *Transportation Analysis for the Otay Mesa Community Plan Update* (see Appendix J, Buildout of the Adopted Community Plan analysis). The No Project Alternative would generate approximately 1,165,103 ADT, compared to 1,045,025 ADT generated by the CPU. The report shows that traffic conditions would, therefore, be more congested under the No Project Alternative when compared to the CPU. The No Project Alternative would result in 38 street segments operating at LOS E or F compared to 24 for the CPU in the Horizon Year. The number of peak hour intersections operating at LOS E or F in the AM and/or PM peak hour would be 52 in the Horizon Year for the No Project Alternative and 49 in the Horizon Year for the CPU. In addition, 8 freeway segments would operate at unacceptable levels in the Horizon Year under the No Project Alternative, while 5 freeway segments would operate unacceptably in the Horizon Year for the CPU. Six freeway ramps would operate unacceptably in the Horizon Year No Project Alternative and 5 freeway ramps would operate unacceptably in the Horizon Year with the CPU.

The Transportation Analysis (see Appendix J) identifies mitigation for the No Project Alternative; however, traffic/circulation capacity impacts would be significant and unavoidable, similar to the CPU.

Traffic hazards and circulation and access impacts for the No Project Alternative would be similar to those for the CPU, as both would be subject to the City's Street Design Manual and General Plan policies. While the No Project Alternative does not emphasize alternative transportation to the extent of the CPU, the bus routes and transit in the area are controlled by the MTS and therefore, transit planning would occur regardless of the CPU. Pedestrian orientation would be less emphasized under the No Project Alternative, but this is not anticipated to result in a significant impact relative to alternative transportation, considering that future development would be required to comply with the General Plan policies. The No Project Alternative traffic hazards, circulation and access, and alternative transportation impacts would be less than significant and similar to the CPU.

10.2.1.13 Public Services

The demand for law enforcement, fire protection, educational services, libraries, and parks resulting from implementation of the No Project Alternative would be less than those identified for the CPU as there would be a smaller residential buildout population. As such, the demand for new facilities would be less under this alternative. Impacts related to construction of new facilities under the No Project Alternative would be considered at the time that project-specific designs are available; therefore, this alternative would not result in a significant impact, similar to the CPU.

10.2.1.14 Utilities

Like the CPU, buildout of the No Project Alternative would generate increased demands on water, wastewater and recycled water services, especially in areas where no development or infrastructure currently exists in the CPU area. Improvements to water and recycled water systems have been previously identified in master planning documents. No additional facilities would be necessitated as a result of plan buildout. The physical impacts from these improvements would be evaluated under CEQA at the time they are submitted for review in conjunction with a private development project or as part of a future CIP. Therefore, impacts associated with water and recycled water system improvements would be less than significant at the program-level for both this alternative and the CPU.

Buildout of the No Project Alternative would not directly result in the need for a new landfill. However, compliance with the Storage, Recycling, and C&D ordinances alone would result in only a 40 percent diversion rate within the CPU area. As with the CPU, future subsequent development projects (that meet the threshold) would be required to prepare a Waste Management Plan (WMP) with site-specific waste reduction measures in order to meet the State-mandated 75 percent diversion rate. Because all future projects within the CPU area

may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, the No Project Alternative cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste, like the CPU, would be significant and unavoidable.

Additionally, future projects would be required to design and build storm water infrastructure systems to accommodate new development within the CPU area. All future projects under either the No Project Alternative or the CPU would be required to comply with the City's Storm Water Standards at the project-level and design facilities satisfactory to the City Engineer as further detailed in the Mitigation Framework in Section 5.14, regardless of whether the CPU of this alternative are implemented. Therefore, impacts would be less than significant under both the No Project Alternative and the CPU.

10.2.1.15 Water Supply

The No Project Alternative is consistent with water demand assumptions included in the regional water resource planning documents of the SDCWA and MWD. Appendices M-1 and M-2 (Water Supply Assessment Reports) demonstrates that there would be sufficient water to supply future development in accordance with either the No Project Alternative or CPU, and impacts would be less than significant for both this alternative and the CPU.

10.2.1.16 Population and Housing

The No Project Alternative would result in buildout of fewer dwelling units (12,400 dwelling units) relative to the CPU (18,774). In addition, the No Project Alternative would not create mixed-use village centers where residential uses would be integrated with employment and commercial uses as anticipated in the CPU. Thus, the population and economic prosperity goals and objectives of both the General Plan and SANDAG's RCP would not be achieved. However, neither the No Project Alternative, nor the CPU would result in substantial, unanticipated population growth or conflict with the City's affordable housing regulations. Therefore, impacts would be less than significant under both the No Project Alternative and the CPU.

10.2.1.17 Agriculture/Mineral Resources

a. Agriculture

Because neither the No Project Alternative, nor the CPU designate areas for agricultural land uses, no planned long-term agriculture would be eliminated upon full build out under either the CPU or No Project Alternative. Therefore, both the No Project Alternative and the CPU would result in less than significant impacts to agriculture.

b. Mineral Resources

There are no regionally significant MRZ-2 areas within the CPU area. Although the No Project Alternative would have a slightly larger grading footprint than the CPU, there are no significant mineral resources that would be impacted. Therefore, both the No Project Alternative and the CPU would result in less than significant impacts to mineral resources.

10.2.1.18 Greenhouse Gas Emissions

The CPU would introduce higher density residential and commercial land use designations, as well as several new mixed-use and industrial land use designations, which would in turn, reduce VMT, as compared to the No Project Alternative. As such, the GHG emissions associated with the No Project Alternative would be greater than those associated with the CPU. While future development proposals would be required to implement GHG emission reduction measures under both the No Project Alternative and the CPU, buildout of either would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unavoidable at the program-level.

10.2.1.19 Conclusion Regarding the No Project Alternative

Implementation of the No Project Alternative would not avoid any of the significant and unavoidable impacts of the CPU (air quality, [criteria pollutants, sensitive receptors - stationary sources/collocation], noise [traffic, stationary source, and construction], traffic/circulation [capacity], utilities [solid waste], and greenhouse gas emissions).

This alternative would preserve less open space resulting in greater potential impacts to biological, historical, and paleontological resources because these areas would be available for future development. However, mitigation is available to reduce these potential impacts to below a level of significance regardless of whether the CPU or the No Project Alternative is implemented. This alternative would also generate a greater number of ADT than the CPU, and thus impacts from traffic congestion (such as, air quality, traffic noise and greenhouse gas emissions) would be greater than under the CPU. However, noise associated with stationary sources would be less under the No Project Alternative because the rezone and new land use designations for IBT and BPRP would not occur.

The No Project Alternative meets several of the 10 project objectives, but none to the same extent as the CPU. This alternative does not include the same diversity and flexibility of land uses, and therefore, does not allow for a full range of industrial uses. The IBT designation included under the CPU, better implements General Plan and CPU goals relative to a subregional employment center.

The No Project Alternative also does not include the two mixed-use villages as proposed by the CPU. The village areas proposed under the CPU implement both General Plan and

CPU goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The No Project Alternative would allow for some suburban-type development, which could be more auto-centric, and contribute to, rather than reduce GHG impacts.

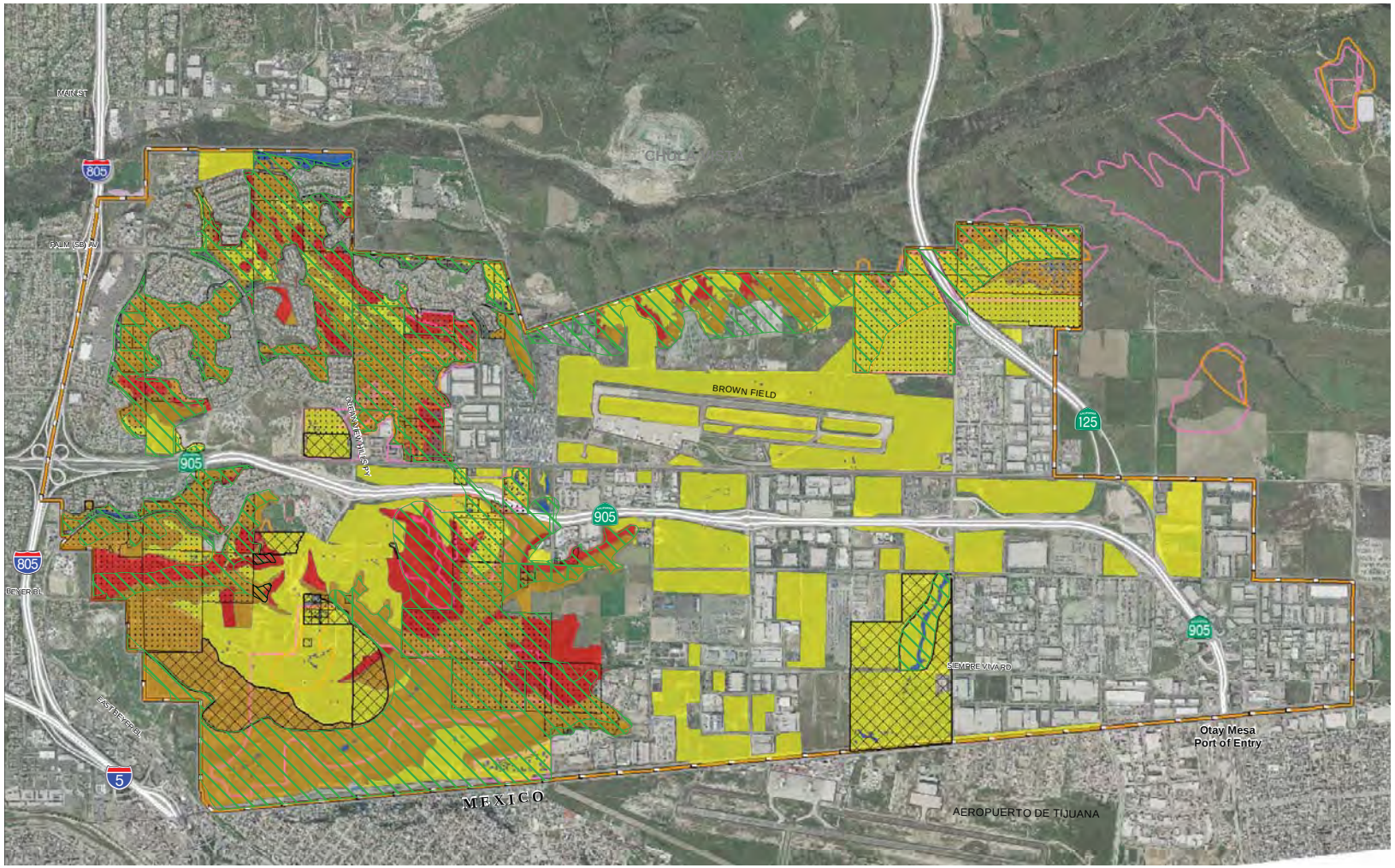
10.2.2 Reduced Biological Impacts Alternative

The Reduced Biological Impacts Alternative is intended to reduce impacts to biological resources in within the CPU area, as illustrated on Figure 10-2. Three locations of reduced impacts would occur within the western portion of the CPU area including: the Southwest Village; the community commercial site west of Oceanview Hills Parkway and north of Otay Mesa Road; and southwest of San Ysidro High School. Reduction in these areas would result in increased preservation of coastal sage scrub, maritime succulent scrub, vernal pools and vernal pool species, as well as non-native grasslands with the potential for vernal pool and burrowing owl habitat restoration. The preservation of coastal sage scrub habitat within the Southwest Village area would improve connections to local habitat corridors to the west between I-805, Beyer Boulevard, and East Beyer Boulevard. In the location west of the San Ysidro High School, this alternative would conserve vernal pool resources and non-native grasslands, consistent with the USFWS Biological Opinion that has been prepared for the Candlelight project site.

An additional location where impacts would be reduced is located along the drainage area west of La Media Road in the south-central portion of the CPU area. Preservation of non-native grassland at this location would reduce impacts to and preserve vernal pools and their associated watersheds, as well as, habitat for burrowing owl. Preservation at this location would also include riparian and mule fat scrub habitat. In addition, the local habitat corridor would be improved from the International Border north to Airway Road.

The land within these areas of reduced impact would become part of the MHPA and development potential would be restricted to 25 percent within the least sensitive portion of the site. The only exception would be the eastern mesa within the Southwest Village which would be 100% conserved. This area has a high potential for vernal pool and burrowing owl restoration due to the appropriate vernal pool soils, connectivity with the adjacent open space network, and minimum edge effects. As a partial offset for this conservation area, a MHPA Boundary Line Adjustment (see Figure 10-2) may be considered within two small

Map Source: City of San Diego



Vegetation Classification
- Tier I Uplands
- Tier II Uplands
- Tier IIIA Uplands
- Tier IIIB Uplands
- Wetlands
- Planning Areas
- Multi-Habitat Planning Area
- Reduced Development Area per Alternative
- Potential MHPA Boundary Line Adjustment
- San Diego Fairy Shrimp Critical Habitat
- Navarretia Fossalis Critical Habitat
- 100% Conserved Lands

No Scale

FIGURE 10-2
Reduced Biological Impacts Alternative

canyon heads located south of the proposed Beyer Boulevard on the western edge of the Southwest Village area.

The discussion of this alternative is conceptual, as detailed land use plans have not been prepared. A summary of the conceptual modifications and the associated environmental impacts under this alternative for each of the issue areas is presented below.

10.2.2.1 Land Use

Application of this alternative would preserve additional biologically sensitive lands in the western portion of the CPU area and along the drainage located west of La Media Road, thereby reducing impacts to coastal sage scrub habitat and maritime succulent scrub habitat, nonnative grasslands, mulefat scrub, riparian, vernal pools and vernal pool species, and burrowing owl habitat. Although this alternative would not allow for the same amount of development within the Southwest Village and IBT designation, it would be generally consistent with the policies of the General Plan and the CPU including LU 2.1-2, LU 2.6-1,UD4.2-6, and UD 4.3-1 (see Table 5.4-5).

The Reduced Biological Impacts Alternative would allow for less grading or ground disturbing activity, and thus would reduce conflicts with the purpose and intent of the ESL Regulations and the Historical Resources Regulations of the LDC as compared to the CPU. Impacts associated with the City's MHPA Land Use Adjacency Guidelines would be similar under both this alternative and the CPU. As with the CPU, the Reduced Biological Impacts Alternative would result in significant impacts which would be reduced to below a level of significance at the program level with implementation of the Mitigation Framework which requires regulatory compliance with the LDC and all applicable standards and guidelines. Therefore, impacts related to Land Use compliance under this alternative would be similar to or less then under the CPU.

10.2.2.2 Landform Alteration/Visual Quality

The increase in open space resulting from this alternative would reduce the extent of landform alteration and grading. Non-native grasslands, vernal pool resources and restorable lands for vernal pool and burrowing owl would be conserved in the southwest portion of the community and the drainage area west of La Media Road. Additionally, coastal sage scrub and maritime succulent scrub located on the steep slopes in the southwest area would be preserved along with the riparian habitat in the drainage area west of La Media Road. The reduced grading, preservation of steep slopes, and increased open space would improve the aesthetic characteristics of the built out CPU area. Therefore, the Reduced Biological Impacts Alternative would reduce the visual quality impacts associated with the CPU.

10.2.2.3 Air Quality/Odor

The Reduced Biological Impacts Alternative would include more open space than the CPU, thereby resulting in fewer residences in the Southwest Specific Plan Area and less community commercial and industrial/business park development within the CPU. Correspondingly, this alternative would generate fewer ADT than the CPU. Like the CPU, the Reduced Biological Impacts Alternative would not be consistent with the adopted community plan land use designations upon which the RAQS and SIP were based; however, the changes in the land uses under both the CPU and this alternative would result in reduced traffic, and in turn, fewer emissions than under the adopted Community Plan. Although neither the Reduced Biological Impacts Alternative, nor the CPU would obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP, impacts associated with both construction and operational emissions of criteria pollutants covered under the RAQS for this alternative would be the same as the CPU and remain significant and unavoidable. Despite the reduction in ADT under this alternative, development would still occur relative to residential, commercial and industrial land uses, and therefore, impacts associated with stationary sources and collocation would remain significant and unavoidable as with the CPU.

10.2.2.4 Biological Resources

By definition the Reduced Biological Impacts Alternative would increase the acreage of biological sensitive habitat and species preserved throughout the CPU area. This alternative would reduce impacts to coastal sage scrub and maritime succulent scrub habitat, non-native grasslands, vernal pools and vernal pool species, and burrowing owl habitat within the Southwest Village area. Additionally, mulefat scrub, riparian, and non-native grassland would be preserved within the drainage area west of La Media Road. Preservation of the non-native grasslands would also reduce impacts and preserve vernal pools and their associated watersheds, as well as, habitat for burrowing owl. Wildlife corridors also would be conserved to a greater extent under this alternative.

This alternative would implement several of the CPU policies relating to biological resources including CE 8.1.1, CE 8.1.2, CE 8.1.4, CE 8.1.5, CE 8.1.6, CE 8.1.7, CE 8.1.8, CE 8-1-10, and CE.8.1.11 (see Table 5.4-5). In addition to increased preservation of the biological resources, this alternative would increase available acreage for restoration of vernal pool and burrowing owl habitat, provide expanded wildlife linkages, and decrease impacts to critical habitat for San Diego fairy shrimp and spreading navarretia. This alternative would lessen impacts to coastal sage scrub, non-native grassland, vernal pools and burrowing owls. Therefore, impacts to biological resources would be less under the Reduced Biological Impacts Alternative when compared to the CPU. Therefore, as with the CPU, projects implemented under this alternative that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no biological resources present on the project site; the project can be processed ministerially

and would not be subject to further environmental review under CEQA. This requires submittal of a focused Biological Survey prepared by a qualified biologist in accordance with the City's Biology Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Biological Resources. Although impacts would be slightly less under this alternative when compared to the CPU, strict adherence to the Mitigation Framework would still be required to reduce potential impacts to below a level of significance. Therefore, as with the CPU, impacts to biological resources would be reduced to below a level of significance at the program-level.

10.2.2.5 Historical Resources

Impacts to historical resources resulting from implementation of the Reduced Biological Impacts Alternative would be reduced, because the extent of grading would be less than under the CPU. With preservation of greater open space, this alternative would result in potential avoidance of impacts to historical resources. It should be noted however, that under both this alternative and the CPU, future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). For these project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no archaeological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of an Archaeological Survey prepared by a qualified archaeologist in accordance with the City's Historical Resources Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Historical Resources. Although impacts would be slightly less under this alternative when compared to the CPU, strict adherence to the Mitigation Framework would still be required to reduce potential impacts to below a level of significance.

10.2.2.6 Human Health/Public Safety/Hazardous Materials

Impacts under this category resulting from implementation of the Reduced Biological Impacts Alternative would be similar to those associated with the CPU. Despite the reduction in developable land under this alternative, resulting in increased in open space areas, development and grading under this alternative would still occur relative to residential, commercial and industrial land uses, and therefore, impacts associated with hazardous sites, substances, health hazards, wildfire hazards and aircraft hazards would be similar or slightly less than the CPU. However, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.2.7 Hydrology and Water Quality

This alternative would reduce the extent and intensity of development through greater preservation of open space, and therefore, would incrementally reduce the impacts to hydrology and water quality. Despite this reduction, future development under both the Reduced Biological Impacts Alternative and the CPU would still be required to comply with existing local, state and federal regulations relative to runoff and water quality. Therefore, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.2.8 Geology/Soils

The potential impacts associated with geology and soils resulting from implementation of the Reduced Biological Impacts Alternative would be similar to those identified for the CPU. As with the CPU, implementation of the Reduced Biological Impacts Alternative has the potential to result in significant impacts related to geologic hazards associated with unstable conditions related to compressible soils, landslides, seismicity (faults), and expansive soils. Despite this reduction in developable area future development under both the Reduced Biological Impacts Alternative and the CPU would still be required to comply with existing local, state and federal regulations relative to engineering design and construction in areas where unstable or unsuitable soils have been identified. Therefore, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.2.9 Energy Conservation

Development under the Reduced Biological Impacts Alternative would reduce the energy demand from that described for the CPU. The reduced development intensity in the residential area, community commercial, and industrial/business park area would result in a decreased energy demand as there would be a smaller population within the CPU area. Similar to the CPU, the Reduced Biological Impacts Alternative would not result in the use of excessive amounts of fuel or other forms of energy during construction. Also, this alternative, like the CPU, is not anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of both the CPU and the Reduced Biological Impacts Alternative, impacts associated with energy use would be similar, although slightly less under this alternative, and less than significant.

10.2.2.10 Noise

Noise impacts resulting from implementation of the Reduced Biological Impacts Alternative would be similar to those identified for the CPU relative to stationary noise sources. Similar

areas of collocation would occur under the Reduced Biological Impacts Alternative because the IBT land use designation is included, and, therefore, the potential for noise sensitive land uses to be exposed to excessive noise would be similar as under the CPU.

Noise impacts associated with traffic resulting from implementation of the Reduced Biological Impacts Alternative would be incrementally less than those identified for the CPU because of the reduced land use intensity and likely incrementally reduced traffic volumes on the CPU area roadways. Stationary and traffic-related noise impacts would still likely be significant and unavoidable for the Reduced Biological Impacts Alternative, as for the CPU.

10.2.2.11 Paleontological Resources

Impacts to paleontological resources associated with development under the Reduced Biological Impacts Alternative would be slightly less than under the CPU because of the reduced acreage which would be graded. This reduced grading into sensitive formations would reduce the potential impacts to paleontological resources. It should be noted however, that under both this alternative and the CPU future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). For these project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no paleontological fossil resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of a Paleontological Letter prepared by a qualified paleontologist in accordance with the City's Paleontological Resources Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources. Although impacts would be slightly less under this alternative when compared to the CPU, strict adherence to the Mitigation Framework would still be required to reduce potential impacts to below a level of significance.

10.2.2.12 Traffic/Circulation

Impacts associated with the Reduced Biological Impacts Alternative are addressed qualitatively in this analysis. Under the Reduced Biological Impacts Alternative a greater area would be preserved as open space than under the CPU, resulting in a decrease in the number of potential residential dwelling units and the amount of areas designated for community commercial and industrial/business park development. Because of the reduction in the total number of dwelling units as well areas designated for community commercial and industrial square-footage, the total number of ADT's would be reduced when compared to the CPU. This would result in fewer impacts relative to traffic capacity, access and circulation than would occur under the CPU. However, due to the changes in land use and increased

intensity of development relative to the existing condition, it is anticipated that the Reduced Biological Impacts Alternative like the CPU would still result in traffic/circulation and capacity impacts, which would remain significant and unavoidable.

Traffic hazards and circulation and access impacts for the Reduced Biological Impacts Alternative would be similar to those for the CPU, as both would be subject to the City's Street Design Manual and General Plan policies. Pedestrian orientation would be similarly emphasized under the Reduced Biological Impacts Alternative; therefore, it is not anticipated to result in a significant impact relative to alternative transportation. For the Reduced Biological Impacts Alternative traffic hazards and alternative transportation impacts would be less than significant, similar to the CPU.

10.2.2.13 Public Services

Impacts to public services resulting from implementation of the Reduced Biological Impacts Alternative would be similar, although slightly less than those identified for the CPU, as the Reduced Biological Impacts Alternative would decrease the projected population. As such, the demand for new facilities would be slightly less under this alternative. Impacts related to construction of new facilities under the Reduced Biological Impacts Alternative would be considered at the time site-specific design plans are available at the project-level, similar to the CPU; therefore, this alternative would not result in a significant impact, similar to the CPU.

10.2.2.14 Utilities

Like the CPU, albeit to a lesser extent, buildout of the Reduced Biological Impacts Alternative would increase the demand for water, wastewater and recycled water services. Improvements to water and recycled water systems have been previously identified in master planning documents. No additional facilities would be necessitated as a result of buildout of the Reduced Biological Impacts Alternative. The physical impacts from these improvements would be evaluated under CEQA as they are required to be implemented. Therefore, impacts associated with water and recycled water system improvements would be less than significant at the program-level.

Like the CPU, buildout of the Reduced Biological Impacts Alternative would not directly result in the need for a new landfill. However, compliance with the Storage, Recycling, and C&D ordinances alone would result in only a 40 percent diversion rate within the CPU area. As with the CPU, future subsequent development projects (that meet the threshold) would be required to prepare a waste management plan with site-specific waste reduction measures in order to meet the State-mandated 75 percent diversion rate. Because all future projects within the CPU area may not be required to prepare a waste management plan or may not reduce project-level waste management impacts below a level of significance, the Reduced Biological Impacts Alternative cannot be guaranteed, at the program-level, to meet

the 75 percent diversion requirement. Therefore, direct impacts associated with solid waste would be significant and unavoidable, similar to the CPU.

Additionally, under this alternative like the CPU, future projects would be required to design and build storm water infrastructure systems to accommodate new development within the CPU area; however, under this alternative less area would be available for development and therefore, less biological impacts would result. Although the specific location and design details for future storm water infrastructure improvements are unknown at this time and all projects would be reviewed for consistency with the City's Storm Water Standards and designed satisfactory to the City Engineer. Therefore, strict adherence to existing storm water regulations, conformance with General Plan and CPU policies, and implementation of the Mitigation Framework which requires future review under CEQA would assure that impacts associated with the need for an construction of future storm water infrastructure under both this alternative and the CPU would be less than significant.

10.2.2.15 Water Supply

The Reduced Biological Impacts Alternative, like the CPU, is consistent with water demand assumptions included in the regional water resource planning documents of the SDCWA and MWD. Appendices M-1 and M-2 (Water Supply Assessment Reports) demonstrate that there would be sufficient water to supply future development in accordance with the CPU. Because the Reduced Biological Impacts Alternative would yield fewer units than the CPU, there would be adequate water supply for this alternative, and impacts would be less than significant and therefore, similar to the CPU.

10.2.2.16 Population and Housing

The Reduced Biological Impacts Alternative would result in a reduction in the number of dwelling units within the Southwest Village relative to the CPU, and fewer square-feet of Community Commercial and IBT uses. Like the CPU, the Reduced Biological Impacts Alternative would create mixed-use village centers where residential uses would be integrated with employment and commercial uses, but with a lesser intensity of residential uses than under the CPU. Thus, the population and economic prosperity goals and objectives of both the General Plan, and SANDAG's RCP would be achieved. Neither the Reduced Biological Impact Alternative, nor the CPU would result in substantial, unanticipated population growth or conflict with the City's affordable housing regulations. Therefore, impacts would be less than significant under both the Reduced Biological Impact alternative and the CPU.

10.2.2.17 Agriculture/Mineral Resources

a. Agriculture

The adopted Community Plan does not designate land for agricultural land uses, thus no planned long-term agriculture would be eliminated upon full build out of either the CPU or the Reduced Biological Impacts Alternative. Thus, both this alternative and the CPU would result in less than significant impacts to agriculture.

b. Mineral Resources

There are no regionally significant MRZ-2 areas within the CPU area. The Reduced Biological Impacts Alternative would result in reduced grading relative to the CPU, thus there are no significant mineral resources that would be impacted under this alternative. Therefore, both the Reduced Biological Impacts Alternative and the CPU would result in less than significant impacts to mineral resources.

10.2.2.18 Greenhouse Gas Emissions

Like the CPU, the Reduced Biological Impacts Alternative would introduce higher density residential and commercial land use designations, as well as several new mixed-use and industrial land use designations. However, GHG emissions associated with the Reduced Biological Impacts Alternative would be less than those associated with the CPU, because of the greater preservation of open space/reduced intensity of development and fewer associated ADT. While future development proposals would be required to implement GHG emission reduction measures under both the Reduced Biological Impacts Alternative and the CPU, buildout in either case would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unavoidable at the program-level.

10.2.2.19 Conclusion Regarding the Reduced Biological Impacts Alternative

Implementation of the Reduced Biological Impacts Alternative would reduce but not avoid any of the identified significant and unavoidable impacts of the CPU (i.e., air quality [criteria pollutants, sensitive receptors - stationary sources/collocation], noise [traffic, construction, and stationary sources], traffic/circulation [capacity], utilities [solid waste], and greenhouse gas emissions).

However, this alternative would generate fewer ADT due to the greater preservation of open space/reduced amount of residential development within the Southwest Specific Plan Area and reduced amount of development within areas designated as Community Commercial and IBT. Thus, impacts from traffic congestion (such as, air quality, noise, and greenhouse gas emissions) would be incrementally reduced when compared to the CPU. Also, this

alternative proposes a greater amount of open space than the CPU, and therefore, would result in less grading and ground disturbance than the CPU. Therefore, this alternative would further reduce impacts to biological resources, historical resources, hydrology/water quality, human health/public safety/hazardous materials, utilities (including solid waste), and paleontological resources.

Although significant and mitigated under both this alternative and the CPU, impacts associated with wildfire hazards may be slightly increased under the Reduced Biological Impacts Alternative due to the greater amount of natural open space in proximity to development.

The Reduced Biological Impacts Alternative generally meets the CPU objectives. The alternative preserves more area in open space and in turn reduces the extent of residential development, within areas designated for Community Commercial, and industrial/business park development. This would not however, preclude this alternative from meeting General Plan and Community Plan goals relative to mixed-use, transit-oriented communities, but would not accommodate anticipated population growth to the same extent as the CPU.

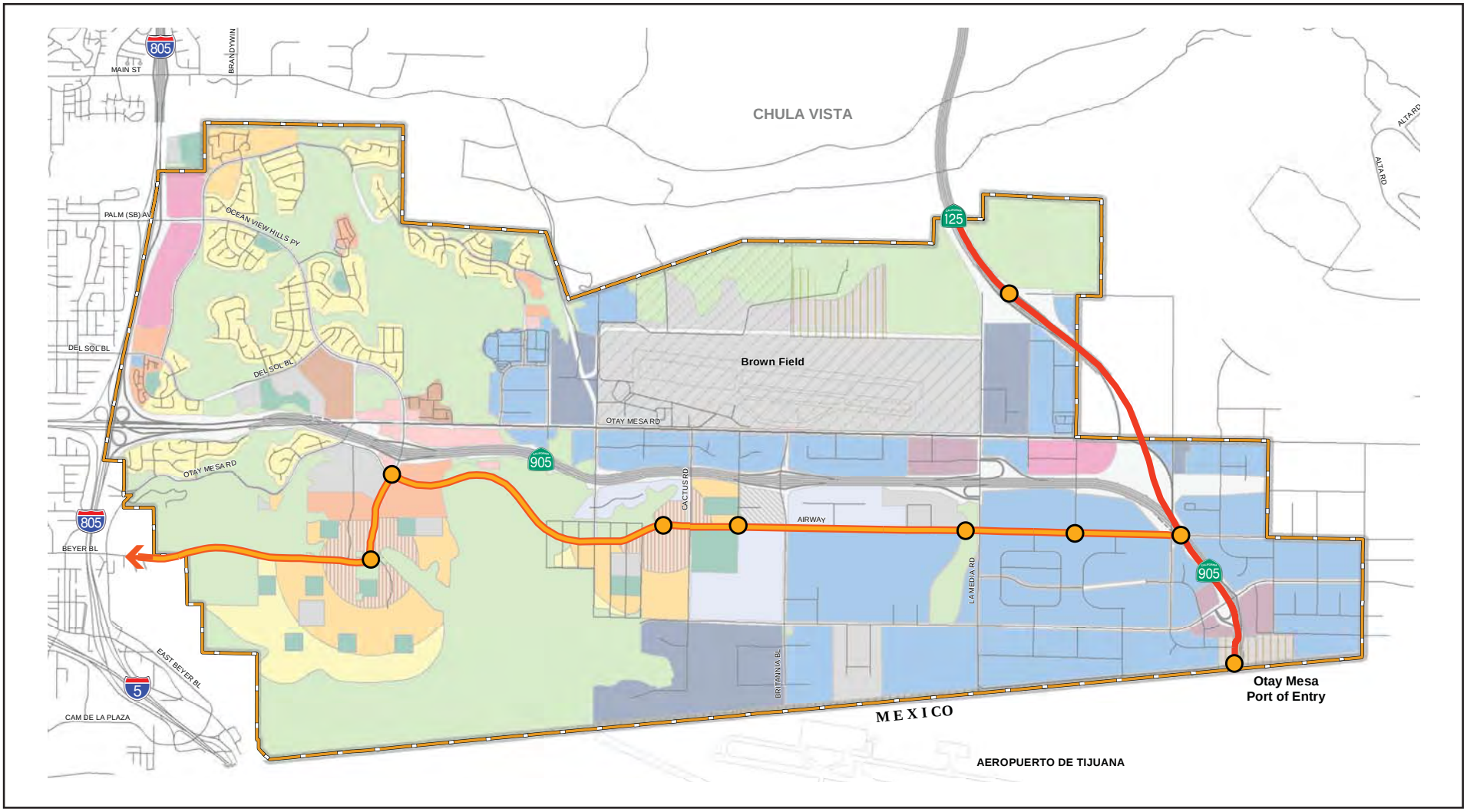
10.2.3 Reduced Density Alternative

The Reduced Density Alternative would convert the IBT land use designation to “Light Industrial” and reduce the permitted residential densities within both the Southwest Specific Plan Area and Central Village Area (Figure 10-3).

The IBT land use designation combines the uses permitted in both Business Park and Light Industrial designations and would allow for single- and multi-tenant office, research and development, in addition to those uses permitted in the Light Industrial designation. Under the CPU, the IBT would be applied in portions of the community adjacent to the border, POE, or areas in transition to higher intensity industries. Under the Reduced Density Alternative, areas designated as IBT would instead be designated as Light industrial, thereby excluding business park use types, which would serve to reduce the trip generation rates in these areas.

Under this alternative, the maximum number of permitted residential units within the Southwest Specific Plan Area would be reduced from 5,880 to 3,850. The maximum number of permitted residential units within the Central Village would be reduced from 5,246 to 1,940. The permitted densities under the Reduced Density Alternative are consistent with the City of San Diego’s Transit Oriented Development (TOD) Guidelines. Densities under this alternative are assigned based on proximity to future transit (i.e., areas closest to transit would have a density of 25 du's/ac; areas slightly further away would have a density of 12/ac, and areas well beyond transit service would have a density of 7/ac).

Map Source: City of San Diego



Community Plan Boundary

Transit Routes

Future Transit

Bus Rapid Transit

Stops

Potential Transit Stop

No Scale

FIGURE 10-3

Reduced Density Alternative

Buildout projections for the Reduced Density Alternative compared to the CPU are shown below in Table 10-4.

TABLE 10-4
COMPARISON OF REDUCED DENSITY ALTERNATIVE WITH CPU

Land Use Categories	Reduced Density Alternative[1]	CPU[2]
Residential	803 ac/ **13,438 du**	802 ac/ **18,774 du**
Commercial	284 ac/ 3,917,000 sq. ft.[3]	302 ac/ 3,917,000 sq. ft.[3]
Village Centers	560 ac/ **5,790**	560ac/ **11,126 du**
Industrial	2,510 ac/ 54,461,000 sq. ft.[3] (No IBT)	2,510 ac/ 54,461,000 sq. ft.[3,4] (IBT with CPIOZ)
Institutional	1,120 ac	1,120 ac
Parks	164 ac	151 ac
Open Space	2,837 ac	2,833 ac
Right-of-Way	1,023 ac	1,023 ac
ADT	**910,435[1]**	**1,045,025[3]**
TOTAL	9,301 ac	9,302 ac

[1]SOURCE: City of San Diego
[2]SOURCE: City of San Diego Draft CPU Land Use Map, September 10, 2013
[3]SOURCE: Urban Systems. Transportation Analysis for the OMCPU, June 2012
ac = acre; du = dwelling unit; sq. ft. = square feet.
[4]Industrial Uses under the CPU include Heavy and Light industrial, IBT and Business Park land use categories

10.2.3.1 Land Use

The Reduced Density Alterative would convert all IBT designated lands to Light Industrial, thereby reducing potential impacts associated with the adjacency of nonindustrial and industrial uses. However, some beneficial features of the CPU would not occur. These include new specific land use designations (e.g., International Business and Trade and Business Park – Residential Permitted). As such, the goals and objectives of both the CPU and the General Plan would not be achieved to the same extent as under the CPU. Impacts associated with the City's MHPA Adjacency Guidelines would be similar under both this alternative and the CPU. Additionally, the Reduced Density Alternative would result in buildout of fewer dwelling units and less commercial/retail and industrial acreage, and therefore, allow for less grading or ground disturbing activity, which would reduce conflicts with the purpose and intent of the ESL Regulations and the Historical Resources Regulations of the LDC when compared to the CPU. As with the CPU, this alternative would result in significant impacts associated with biological and historical resources which would be reduced to below a level of significance at the program level with implementation of the Mitigation Framework which requires regulatory compliance with the LDC and all applicable standards and guidelines. Therefore, impacts related to Land Use compliance under this alternative would be similar to or less then the CPU.

10.2.3.2 Landform Alteration/Visual Quality

Within the primarily developed western third of the CPU area, the Reduced Density Alternative would result in roughly the same visual quality impacts as the CPU. This is because the residential land use patterns in the Reduced Density Alternative would be similar to the CPU, although residential land uses would be constructed to a higher intensity under the CPU within the southwest quadrant as compared to the Reduced Density Project Alternative. However, unlike the CPU, the Reduced Density Alternative would not allow for the collocation of light industrial and business park uses within the eastern industrial areas, as no IBT land use designation would occur under this alternative. The CPU would ensure the compatibility of development with the IBT through implementation of the CPIOZ. Therefore, from an overall visual perspective of the built out community, the aesthetic impacts under this alternative would be similar to those identified for the CPU.

10.2.3.3 Air Quality/Odor

Overall, the Reduced Density Alternative would construct fewer residences than the CPU and would not allow for the IBT land use designation, thereby generating approximately 100,000 fewer trips when compared to the CPU. In addition, under the Reduced Density Alternative, village centers with transit stations would still be created, but at a lesser intensity. As such, the goals of reducing trips and air emissions contained in the City of Villages strategy would be achieved under the Reduced Density Alternative, albeit to a lesser extent than under the CPU.

Like the CPU, the Reduced Density Alternative would not be consistent with the adopted community plan land use designations upon which the RAQS and SIP were based; however, the changes in the land uses under both this alternative and the CPU would result in reduced traffic, and in turn, fewer emissions than under the adopted Community Plan. Therefore, neither the Reduced Density Alternative nor the CPU would obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP, and impacts would be the same for both.

Impacts associated with both construction and operational emissions of criteria pollutants under the Reduced Density Alternative would be less than those identified for the CPU. Under the Reduced Density Alternative, total ROG, NO_x, CO, SO, PM_{10} and $PM_{2.5}$ emissions would be less than emissions under the CPU. The Reduced Density Alternative would include a similar number of industrial uses (stationary emission sources), and truck traffic (diesel emissions), and fewer ADT volume than the CPU. Therefore, by comparison, the Reduced Density Alternative would result in fewer impacts than the CPU relative to air quality. Despite the reduction in ADT under this alternative, development would still occur relative to residential, commercial and industrial land uses, and therefore, impacts associated with stationary sources and collocation (air toxics) would remain significant and unavoidable as with the CPU.

10.2.3.4 Biological Resources

The Reduced Density Alternative would have a similar development footprint as the CPU. Therefore, the extent of biological impacts from the Reduced Density Alternative would be similar to that under the CPU, as the amount of preserved open space and extent of disturbance from future development would be approximately the same. The types of impacts to sensitive resources, habitat, and species also would be similar. As with the CPU, projects implemented under this alternative that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no biological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of a focused Biological Survey prepared by a qualified biologist in accordance with the City's Biology Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Biological Resources. Like the CPU, strict adherence to the Mitigation Framework would still be required to reduce potential impacts to below a level of significance.

10.2.3.5 Historical Resources

Since the CPU area includes known historical and prehistoric resources (see Section 5.5), future development has the potential to result in significant direct and/or indirect impacts to cultural or historical resources for both the Reduced Density Alternative and the CPU. As with the CPU, implementation of this alternative would require adherence to all applicable, federal, state, and local regulations regarding the protection of historical resources, as further described in Section 5.5. The extent of impacts to historical resources resulting from implementation of the Reduced Density Alternative would be similar to those identified for the CPU because the extent and areas of disturbance by development would be generally the same, only the land use designation would change.

As with the CPU, implementation of the Reduced Density Alternative would result in potentially significant impacts related to historical resources at the program-level. It should be noted however, that under both this alternative and the CPU future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). For these project types that are consistent with the OMCP, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no archaeological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of an Archaeological Survey prepared by a qualified archaeologist in accordance with the City's Historical Resources Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance

with CPIOZ Type B and the Mitigation Framework for Historical Resources. As such, future development proposals implementing this alternative or the CPU would be required to incorporate the Mitigation Framework for Historical Resources adopted in conjunction with the certification of this PEIR. With adherence to the Mitigation Framework, the program-level impacts related to prehistoric or historical archaeological sites would be reduced to below a level of significance.

10.2.3.6 Human Health/Public Safety/Hazardous Materials

Because the Reduced Density Alternative would segregate non-industrial land use from industrial uses to a greater extent than under the CPU through eliminating the IBT, the risk of exposure to hazardous materials would be slightly less under this alternative, although the development footprint for the land uses under this alternative would remain the same. The identification and treatment of hazardous materials within the CPU area relative to this alternative would be required to comply with all applicable federal, state, and local regulations regarding hazardous materials siting, assessment, and remediation. Strict compliance with all applicable regulations would preclude the potential for impacts under both this alternative and the CPU.

The Reduced Density Alternative and the CPU would have similar development footprints, and therefore, would be subject to similar hazards related to wildfires. Wildfire hazard impacts would be significant, but would still be subject to the same regulations for compliance as with the CPU. Impacts under this category resulting from implementation of the Reduced Density Alternative would be similar to those associated with the CPU. Development and grading would still occur relative to residential, commercial and industrial land uses, and therefore, impacts associated with hazardous sites, substances, health hazards, wildfire hazards and aircraft hazards would be similar or slightly less than the CPU. However, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.3.7 Hydrology and Water Quality

Although the residential densities and industrial use categories for the Reduced Density Alternative differ slightly from the CPU, the area to be developed is roughly similar. The Reduced Density Alternative would preserve a similar amount of open space as with the CPU; therefore, this alternative would result in similar impacts associated with hydrology, flooding and water quality. Despite this reduction, future development under both the Reduced Density Alternative and the CPU would still be required to comply with existing local, state and federal regulations relative to runoff and water quality. Therefore, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.3.8 Geology/Soils

Impacts associated with geology and soils resulting from implementation of the Reduced Density Alternative would be similar to those identified for the CPU. As with the CPU, implementation of the Reduced Density Alternative has the potential to result in significant impacts related to geologic hazards associated with unstable conditions related to compressible soils, landslides, seismicity (faults), and expansive soils. Future development under both the Reduced Density Alternative and the CPU would be required to comply with all applicable local, state, and federal regulations relative to engineering design and construction. Therefore, strict compliance with all applicable local, state, and federal regulations and implementation of the Mitigation Framework would preclude the potential for impacts under both this alternative and the CPU.

10.2.3.9 Energy Conservation

Development under the Reduced Density Alternative would result in less energy demand for both electricity and natural gas when compared to the CPU, because fewer residential units would be constructed. Similar to the CPU, the Reduced Density Alternative would not result in the use of excessive amounts of fuel or other forms of energy during construction. Also, this alternative, like the CPU, is not anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of both the CPU and the Reduced Density Alternative, impacts associated with energy use would be similar, although slightly less under the Reduced Density Alternative, and less than significant.

10.2.3.10 Noise

Noise impacts resulting from implementation of the Reduced Density Alternative would be less than those identified for the CPU relative to stationary noise sources. Fewer areas of collocation would occur under the Reduced Density Alternative because no IBT land use designation is included, and, therefore, the potential for noise sensitive land uses to be exposed to excessive noise would be less than under the CPU.

Implementation of the Reduced Density Alternative would result in less traffic, thereby resulting in less traffic-related noise than would occur under the CPU. Therefore, existing sensitive receptors may experience fewer noise impacts from transportation-related noise sources under the Reduced Density Alternative. Stationary and traffic-related noise impacts would still likely be significant and unavoidable for the Reduced Density Alternative, as anticipated for the CPU.

10.2.3.11 Paleontological Resources

As discussed in Section 5.11 (Paleontological Resources), future development has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources for both the Reduced Density Alternative and the CPU. As with the CPU, implementation of this alternative would require adherence to all applicable guidelines further described in Section 5.11. The extent of impacts to paleontological resources resulting from implementation of the Reduced Density Alternative would be similar to those identified for the CPU because the extent and areas of disturbance by development would be generally the same, only the land use designation would change. As with the CPU, implementation of the Reduced Density Alternative would result in potentially significant impacts related to paleontological resources at the program-level. It should be noted however, that under both this alternative and the CPU future development in areas designated for commercial and industrial uses on properties that have not been previously graded, or have been graded but have not otherwise developed, would be subject to review in accordance with the supplemental regulations for CPIOZ Type A (ministerial). For these project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that are no paleontological resources present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. This requires submittal of a Paleontological Letter prepared by a qualified paleontologist in accordance with the City's Paleontology Guidelines. Development proposals that do not comply with the CPIOZ Type A supplemental regulations would be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources. As for the CPU, strict adherence to the Mitigation Framework would still be required to reduce potential impacts to below a level of significance.

10.2.3.12 Traffic/Circulation

Impacts associated with the Reduced Density Alternative are addressed qualitatively in this analysis. According to data generated by the City, the Reduced Density Alternative would generate approximately 135,000 fewer trips than the CPU. This would result in fewer impacts relative to traffic capacity, access and circulation than would occur under the CPU. However, due to the changes in land use and increased intensity of development relative to the existing condition, it is anticipated that the Reduced Density Alternative like the CPU would result in traffic/circulation and capacity impacts, which would remain significant and unavoidable

Traffic hazards and circulation and access impacts for the Reduced Density Alternative would be similar to those for the CPU. Pedestrian orientation would be similarly emphasized under the Reduced Density Alternative, which is based on TOD guidelines; therefore, it is not anticipated to result in a significant impact relative to alternative transportation.

Therefore, the Reduced Density Alternative traffic hazards and alternative transportation impacts would be less than significant and similar to the CPU.

10.2.3.13 Public Services

The demand for law enforcement, fire protection, educational services, libraries, and parks resulting from implementation of the Reduced Density Alternative would be similar, although slightly less than those identified for the CPU, as there would be a smaller buildout resident population. As such, the demand for new facilities would be slightly less under this alternative. Impacts related to construction of new facilities under the Reduced Density Alternative would be considered at the time site-specific design plans are available at the project-level, similar to the CPU; therefore, this alternative would not result in a significant impact, similar to the CPU.

10.2.3.14 Utilities

Like the CPU, buildout of the Reduced Density Alternative would increase the demand for water, wastewater and recycled water services, but to a lesser extent. Improvements to water and recycled water systems have been previously identified in master planning documents. No additional facilities would be necessitated as a result of buildout of the Reduced Density Alternative. The physical impacts from these improvements would be evaluated under CEQA once site-specific design plans are available. Therefore, impacts associated with water and recycled water system improvements would be less than significant at the program-level.

Like the CPU, buildout of the Reduced Density Alternative would not directly result in the need for a new landfill. However, compliance with the Storage, Recycling, and C&D ordinances alone would result in only a 40 percent diversion rate within the CPU area. As with the CPU, future subsequent development projects (that meet the threshold) would be required to prepare a waste management plan with site-specific waste reduction measures in order to meet the State-mandated 75 percent diversion rate. Because all future projects within the CPU area may not be required to prepare a waste management plan or may not reduce project-level waste management impacts below a level of significance, the Reduced Density Alternative cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste would be significant and unavoidable at the program-level, similar to the CPU.

Additionally, under this alternative like the CPU, future projects would be required to design and build storm water infrastructure systems to accommodate new development within the CPU area. Under this alternative, although the development footprint would remain the same, the IBT land use designation would convert to Light Industrial and permitted residential densities would be reduced; storm water infrastructure would still be required.

Although the specific location and design details for future storm water infrastructure improvements are unknown at this time, all projects would be reviewed for consistency with the City's Storm Water Standards and designed satisfactory to the City Engineer. Therefore, strict adherence to existing storm water regulations, conformance with General Plan and CPU policies, and implementation of the Mitigation Framework which requires future review under CEQA would assure that impacts associated with the need for construction of future storm water infrastructure under both this alternative and the CPU would be less than significant.

10.2.3.15 Water Supply

The Reduced Density Alternative, like the CPU, is consistent with water demand assumptions included in the regional water resource planning documents of the SDCWA and MWD. Appendices M-2 and M-3 (Water Supply Assessment Reports) demonstrate that there would be sufficient water to supply future development in accordance with the CPU. Because the Reduced Density Alternative would convert one land use designation to a less intense use category and yield fewer units than the CPU, there would be adequate water supply under this alternative and therefore, impacts would be less than significant.

10.2.3.16 Population and Housing

The Reduced Density Alternative would result in buildout of fewer dwelling units (13,438 dwelling units) relative to the CPU (18,774). Like the CPU, the Reduced Density Alternative would create mixed-use village centers where residential uses would be integrated with employment and commercial uses, but with less intensity of residential uses than under the CPU. Thus, the population and economic prosperity goals and objectives of both the General Plan, and SANDAG's RCP would be achieved. Neither the Reduced Density Alternative, nor the CPU would result in substantial, unanticipated population growth or conflict with the City's affordable housing regulations. As with the CPU, this alternative would be growth accommodating, rather than growth inducing and therefore, impacts would be less than significant under both the Reduced Density Alternative and the CPU.

10.2.3.17 Agriculture/Mineral Resources

a. Agriculture

The adopted Community Plan does not designate land for agricultural land uses, thus no planned long-term agriculture would be eliminated upon full build out of either the CPU or the Reduced Density Alternative. Therefore, both the Reduced Density Alternative and the CPU would result in less than significant impacts to agriculture.

b. Mineral Resources

The Reduced Density Alternative would have a similar grading footprint as the CPU, thus there are no significant mineral resources that would be impacted under this alternative. Therefore, both the Reduced Density Alternative and the CPU would result in less than significant impacts to mineral resources.

10.2.3.18 Greenhouse Gas Emissions

Like the CPU, the Reduced Density Alternative would introduce higher density residential and commercial land use designations, as well as several new mixed-use and industrial land use designations, which would in turn, reduce VMT, as compared to the No Project Alternative. However, GHG emissions associated with the Reduced Density Alternative would be less than those associated with the CPU, because of the reduced intensity of development, fewer residential units, and fewer associated ADT. While future development proposals would be required to implement GHG emission reduction measures under both the Reduced Density Alternative and the CPU, buildout in either case would result in impacts associated with the contribution of GHG emissions to cumulative statewide emissions that would be considered significant and unavoidable at the program-level.

10.2.3.19 Conclusion Regarding the Reduced Density Alternative

Implementation of the Reduced Density Alternative would not avoid any of the significant and unavoidable impacts of the CPU (i.e., air quality [criteria pollutants, sensitive receptors - stationary sources/collocation], noise [traffic, construction and stationary sources], traffic/circulation [capacity], utilities [solid waste], and greenhouse gas emissions). However, this alternative would generate fewer ADT due to the reduced intensity of residential development within the villages, and thus impacts from traffic congestion (such as, air quality, noise, and greenhouse gas emissions) would be incrementally reduced from the CPU. Impacts associated with hazardous materials would be slightly less under the Reduced Density Alternative due to the removal of the IBT land use designation.

The Reduced Density Alternative generally meets project objectives. The alternative replaces the IBT land use designation with light industrial, which is more restrictive, and therefore, does not allow for a full range of industrial uses. The IBT designation better implements General Plan and CPU goals relative to a subregional employment center.

The Reduced Density Alternative also lessens the intensity of residential development within both villages. Greater density within the village areas, such as that proposed under the CPU, better implements General Plan and CPU goals for compact communities, a wider range of housing types, affordability, greater transit opportunities, etc. The Reduced Density alternative would allow for more suburban-type development, which could be more auto-centric, and contribute to, rather than reduce GHG impacts.

Additionally, although this alternative would reduce density; the development footprint within the CPU would remain generally the same, and therefore, result in similar areas requiring grading and ground disturbance as with the CPU. Therefore, this alternative would have similar, or in some cases less impacts to biological resources, historical resources, hydrology/water quality, human health/public safety/hazardous materials, utilities (including solid waste), and paleontological resources depending on the location and development footprint. As with the CPU, strict adherence to the applicable Mitigation Framework for each issue area would reduce potential impacts to below a level of significance.

10.3 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. Based on this CEQA Guidance and the analysis further detailed in Section 10 of the PEIR, the Reduced Biological Impacts Alternative would be considered environmentally superior because it would preserve more open space and, therefore, result in fewer impacts to biological, archaeological, and paleontological resources; hydrology/water quality; human health/public safety/hazardous materials, and utilities (including solid waste), resulting from a decrease in developable land that could be graded. It also would reduce (but not avoid) the significant and unavoidable impacts of the CPU (i.e., air quality (criteria pollutants, sensitive receptors - stationary sources/collocation), noise (traffic, construction and stationary sources), traffic/circulation (capacity), utilities (solid waste), and greenhouse gas emissions.

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11.0 Mitigation Monitoring and Reporting Program

Section 21081.6 of the CEQA Guidelines requires that a mitigation, monitoring, and reporting program be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The CPU is described in this PEIR. The PEIR, incorporated herein as referenced, focused on issues determined to be potentially significant by the City. The issues addressed in the PEIR include land use; transportation/circulation; air quality/odor; agriculture/mineral resources; noise; historical resources; visual effects/neighborhood character; human health/public safety/hazardous materials; hydrology/water quality; water supply; population and housing; utilities; public services; geology/soils; paleontological resources; energy conservation; biological resources; and greenhouse gas emissions.

Public Resources Code section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for land use; air quality; biological resources; historical resources; human health/public safety/hazardous materials; hydrology/water quality; geology/soils; noise; paleontological resources; transportation/circulation; utilities; and greenhouse gas emissions.

The environmental analysis resulted in the identification of a mitigation framework which would reduce potentially significant impacts, but not to below a level of significance for all environmental issue areas noted above. Specifically, mitigation measures for significant impacts related to air quality (criteria pollutants, stationary sources/collocation), transportation/circulation, noise (traffic/stationary sources/construction), utilities (solid waste), and greenhouse gas emissions were identified, but impacts at the program-level remains significant and unavoidable, even with adherence to the Mitigation Framework.

The mitigation monitoring and reporting program for the CPU is under the jurisdiction of the City and other agencies as specified in below. The mitigation monitoring and reporting program for the CPU addresses only the issue areas identified above as significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the CPU.

11.1 Land Use

11.1.1 Regulation Consistency

a. Environmentally Sensitive Lands Regulations

Impact

The development footprint of the CPU would encroach into sensitive ESL areas. Future public and private development proposals would be required to comply with the ESL Regulations or process a Site Development Permit in order to deviate from the regulations. Additionally, all subsequent discretionary projects would be subject to review in accordance with CEQA. At which time, appropriate site-specific mitigation in accordance with the Mitigation Framework LU-2 and BIO-1 through BIO-5-4 would be identified for impacts to sensitive biological resources covered under the ESL regulations. For other resource areas covered under the ESL regulations, such as steep hillsides and floodplains, future projects would be designed to ensure compliance with the supplemental regulations and any other regulatory requirements to ensure that no impacts would occur. The CPU also includes several policies (see Table 5.4-5) which aim to reduce impacts to sensitive and other resources covered under the ESL regulations as well as development regulations required for projects within areas covered by CPIOZ Type A, which address sensitive biological resources. Future projects would be required to comply with the above regulations, policies, and mitigation. Therefore, at the program-level the CPU would not be in conflict with the purpose and intent of the ESL regulations and potential impacts would be below a level of significance.

Mitigation Framework

LU-1a: Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-2 and BIO 1-4 in Section 5-4, Biological Resources.

b. Historical Resources Regulations

Impact

Given the presence of historical resources distributed throughout the CPU area, implementation of the CPU has the potential to result in significant impacts to historical resources. The CPU includes several policies aimed to reduce impacts to historical

resources within the CPU area as well as development regulations required for projects within areas covered by CPIOZ Type A which address archaeological resources. Additionally, incorporation of the mitigation framework for historical resources contained in Section 5.5 would reduce the potential for significant impacts at the project-level.

Mitigation Framework

LU-1b: Future development project types that are consistent with the CPU, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework HIST-1 in Section 5-5, Historical Archaeological Resources.

11.1.2 Environmental Plan Consistency

a. MHPA/Land Use Adjacency Guidelines

Impact

Potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. Implementation of the CPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact at the program-level.

Mitigation Framework

Mitigation for direct impacts to sensitive vegetation, wetlands, and vernal pools from construction of community plan circulation/mobility element roads, collector streets essential for area circulation, and necessary maintenance/emergency access roads within the MHPA shall be accomplished with implementation of Mitigation Framework measures BIO-1 through BIO-4.

Boundary Adjustments

Potential impacts to MHPA preservation configuration as a result of MHPA boundary adjustments shall be addressed through the required MHPA Boundary Line equivalency analysis. Impacts would be less than significant; therefore, no mitigation is required.

MHPA Land Use Adjacency Guidelines

MHPA adjacency impacts would be addressed at the project-level. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate

compliance with the MHPA Land Use Adjacency Guidelines. To ensure avoidance or reduction of potential MHPA impacts resulting from new development adjacent to the MHPA, the following Mitigation Framework measures shall be required for all future projects as part of the subsequent environmental review and development permit processing:

LU-2: All subsequent development projects that are implemented in accordance with the CPU which is adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent development project in an area adjacent to a designated MHPA, the City of San Diego shall identify specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA.

Specific requirements shall include:

- Prior to the issuance of occupancy permits, development areas shall be permanently fenced where development is adjacent to the MHPA to deter the intrusion of people and/or pets into the MHPA open space areas. Signage may be installed as an additional deterrent to human intrusion as required by the City.

- The use of structural and nonstructural best management practices (BMPs), including sediment catchment devices, shall be required to reduce the potential indirect impacts associated with construction to drainage and water quality. Drainage shall be directed away from the MHPA or, if not possible, must not drain directly into the MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and reviewed satisfactory to the City Engineer.

- All outdoor lighting adjacent to open space areas shall be shielded to prevent light over-spill off-site. Shielding shall consist of the installation of fixtures that physically direct light away from the outer edges of the road or landscaping, berms, or other barriers at the edge of development that prevent light over spill.

- The landscape plan for the project shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA.

- All manufactured slopes must be included within the development footprint and outside the MHPA.

- All brush management areas shall be shown on the site plan and reviewed and approved by the Environmental Designee. Zone 1 brush management areas shall be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area shall be the responsibility of a homeowners association or other private party.

- Access to the MHPA, if any, shall be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the Environmental Designee.

- Land uses, such as recreation 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 the application and/or drainage of such materials into the MHPA. Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement shall be incorporated into leases on publicly owned property as leases come up for renewal.

11.2 Air Quality

11.2.1 Criteria Pollutants

Impact

a. Construction Emissions

As demonstrated by the analysis of hypothetical projects, air emissions due to construction would not exceed the applicable thresholds. However, if several of these projects were to occur simultaneously, there is the potential for multiple projects to exceed significance thresholds.

The projects discussed above are illustrative only. Approval of the CPU would not permit the construction of any individual project, and no specific development details are available at this time. The thresholds presented above are applied on a project-by-project basis and are not necessarily intended for assessment of impacts from large or regional plans. The information is presented to illustrate the potential scope of air impacts for projects that would be developed under the plan. While it is not anticipated that construction activities under the CPU would result in significant air quality impacts, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant.

b. Operational Emissions

While emissions under the CPU would exceed project-level thresholds, which would potentially have a significant air quality impact when compared to the existing condition, the CPU would result in lower emissions than the adopted plan.

The CPU would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions used to develop the SDAPCD RAQS. However, as air emissions from the future developments within the CPU area cannot be adequately quantified at this time, this impact would be significant.

Mitigation Framework

The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and CPU. In general, implementation of the policies in the CPU and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

Where mitigation is determined to be necessary and feasible, these measures shall be included in a Mitigation Monitoring and Reporting Program for the project.

Mitigation measures AQ-1 and AQ-2 shall be implemented to reduce project-level impacts. These measures shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

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

a. Minimizing simultaneous operation of multiple pieces of construction equipment;

b. Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;

c. Use of alternative fueled construction equipment;

d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and

e. Minimizing idling time by construction vehicles.

AQ-2: Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

11.2.2 Sensitive Receptors

a. Stationary Sources

Impact

The CPU includes industrial uses which could generate air pollutants. Without appropriate controls, air emissions associated with planned industrial uses would represent a significant adverse air quality impact.

Any new facility proposed that would have the potential to emit toxic air contaminants would be required to evaluate toxic air problems resulting from their facility's emissions.

If the facility poses a potentially significant public health risk, the facility would submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Specific project-level design information would be needed to determine stationary source emission impacts. Therefore, at the program-level, impacts would be potentially significant.

Mitigation Framework

AQ-3: Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory

and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000; see Section 5-3-5-1(b & c)) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within five years of the date the plan.

b. Collocation

Impact

The CPU would place residential, commercial, and industrial uses in proximity to one another, which would have potential air quality impacts associated with the collocation of incompatible land uses, as described in section 5.3.5.1 (d). Air quality impacts would be associated with exposure to pollutants from the operation of the facility, which can include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The CPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. Future development projects would be required to comply with the collocation policies of the General Plan and CPU, which are necessary to reduce or avoid potential air quality impacts. These policies and standards would include but not be limited to the special policies and performance standards for residential-industrial interface areas, truck circulation, and industrial design, as well as the relevant and mandatory air district, state, and federal controls on toxic air emission sources. While compliance with the CPU and General Plan policies, along with local, state, and federal regulations would reduce potential impacts, future projects may result in sensitive uses (residential uses, schools, parks being located within the buffer distances of the facilities described in Table 5.3-7, and therefore sensitive receptors would be exposed to toxic air emissions. In this case, impacts would be significant.

Mitigation Framework

AQ-4: Prior to the issuance of building permits for any project containing a facility identified in Table 5.3-7, or locating air quality sensitive receptors closer than the recommended buffer distances, future projects implemented in accordance with the CPU shall be required to prepare a health risk assessment (HRA) with a Tier I analysis in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (APCD 2006; OEHHA 2003).

All HRAs shall include:

1. the estimated maximum 70-year lifetime cancer risk,
2. the estimated maximum non-cancer chronic health hazard index (HHI), and
3. the estimated maximum non-cancer acute health hazard index (HHI).

Risk estimates shall each be made for the off-site point of maximum health impact (PMI), the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The location of each of these receptors shall be specified. The lifetime cancer risk, non-cancer chronic and acute health hazard indexes for nearby sensitive receptors shall also be reported. Cancer and non-cancer chronic risk estimates shall be based on inhalation risks. HRAs shall include estimates of population exposure, including cancer burden, as well as cancer and noncancer chronic and acute risk isopleths (contours). The HRA shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.

11.3 Biological Resources

11.3.1 Sensitive Plants and Animals

Impact

Implementation of the CPU has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent to MHPA. Impacts would be significant.

Mitigation Framework

Mitigation is required for impacts that are considered significant under the City of San Diego's Biology Guidelines (2012) and the City of San Diego's CEQA Significance Determination Thresholds (2011d). All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no biological resources are present, the project can be processed ministerially and would not be subject to further environmental review under CEQA. Future development which does not comply with CPIOZ Type A shall be subject to review in accordance with CPIOZ B and shall implement the Biological Resources Mitigation Framework detailed below. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures typically employed include resource avoidance, restoration, or creation of habitat, dedication, or acquisition of habitat,

or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank. Mitigation measures shall be determined and implemented at the project-level. Adherence to the recommendations below is anticipated to minimize impacts to sensitive biological resources.

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

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of Burrowing Owls on the project site. Future projects shall be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts.

Mitigation for Impacts to Sensitive Upland Habitats

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

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

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

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

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

TABLE 5.4-7
MITIGATION RATIOS FOR IMPACTS TO UPLAND VEGETATION COMMUNITIES AND LAND COVER TYPES

Tier	Habitat Type	Mitigation Ratios
TIER 1 (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Location of Preservation Location of Impact: Inside* — Inside 2:1, Outside 3:1 Location of Impact: Outside — Inside 1:1, Outside 2:1
TIER II (uncommon uplands)	Coastal Sage Scrub Coastal Sage Scrub/ Chaparral	Location of Preservation Location of Impact: Inside* — Inside 1:1, Outside 2:1 Location of Impact: Outside — Inside 1:1, Outside 1.5:1
TIER III A (common uplands)	Mixed Chaparral Chamise Chaparral	Location of Preservation Location of Impact: Inside* — Inside 2:1, Outside 3:1 Location of Impact: Outside — Inside 1:1, Outside 2:1
TIER III B (common uplands)	Non-Native Grasslands	Location of Preservation Location of Impact: Inside* — Inside 1:1, Outside 1.5:1 Location of Impact: Outside — Inside 0.5:1, Outside 1:1

Notes:
For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

Mitigation for Impacts to Wetlands

Please refer to Mitigation Framework BIO-4 in Section 5.4.9, Wetlands.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction

Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo burrowing owl, and the cactus wren are further detailed in LU-2 and BIO-2.

11.3.2 Migratory Wildlife

Impact

Future development, including construction or extension of CPU Mobility Element roadways, utility lines, and/or temporary construction activities within the MHPA, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss and/or fragmentation. Any direct or indirect impacts to migratory wildlife nesting, foraging, and movement would be significant.

Mitigation Framework

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

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

11.3.3 Sensitive Habitat

Impact

Impacts to Tier I, II, IIIA, and IIIB habitats would be significant. These sensitive habitats include: maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Impacts to wetlands are discussed in Section 5.4.9.

Mitigation Framework

Please refer to Mitigation Framework BIO-1.

11.3.4 MSCP

Impact

(ISSUE 4) Please refer to Significance of Impact LU-2.

Mitigation Framework

Please refer to Mitigation Framework LU-2.

11.3.5 Invasive Plants

Impact

(ISSUE 5) Please refer to Significance of Impact LU-2.

Mitigation Framework

Please refer to Mitigation Framework LU-2.

11.3.6 Wetlands

Impact

Impacts to wetlands and other jurisdictional water resources would be significant.

Mitigation Framework

Future projects implemented in accordance with the CPU which cannot demonstrate compliance with CPIOZ A because impacts to wetlands/jurisdictional resources cannot be avoided shall be required to implement the following Mitigation Framework:

BIO-4: To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the CPU shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats.

Prior to obtaining discretionary permits for future actions implemented in accordance with the CPU, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012a). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*. A determination of the presence/absence and boundaries of any WoUS and WoS shall also be completed following the appropriate USACE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by California Coastal Commission and the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options; Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetland be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.4-8a and b below. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.

- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved. The Biologically Superior Option mitigation shall include either (1) standard mitigation per Table 5.4-8a, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 5.4-8b is required.

TABLE 5.4-8a
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(With Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	2:1 to 3:1
Vernal pool*	2:1 to 4:1
Basin with fairy shrimp*	2:1 to 4:1
Freshwater marsh	2:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

TABLE 5.4-8b
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(Without Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	4:1 to 6:1
Vernal pool*	4:1 to 8:1
Basin with fairy shrimp*	4:1 to 8:1
Freshwater marsh	4:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.

- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.

- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director (ADD)/Environmental Designee prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;
- Compliance with the RWQCB Section 401 Water Quality Certification; and
- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

Vernal Pools and Vernal Pool Species

Impacts to vernal pools shall require assessments of vernal pool flora and fauna, hydrology, habitat function, and restoration potential and protocol fairy shrimp surveys, in addition to the requirements listed above. Impacts to fairy shrimp shall require either a section 10(a)1(A) permit or Section 7 consultation Biological Opinion from USFWS. If the vernal pool HCP is adopted, the City will receive take authorization for the seven vernal pool species.

Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series) and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

11.3.7 Noise Generation

Impact

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.

Mitigation Framework

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU are included in Sections 5.1.6.3 (Land Use) and 5.4.4.3 (Biological Resources) .Please refer to Mitigation Framework BIO-1 through BIO-4 and LU-2 (MHPA Land Use Adjacency Guidelines).

11.4 Historical Resources

11.4.1 Prehistoric or Historical Impacts

a. Archaeological Resources

Impact

Due to the number and density of prehistoric and historical resources in the CPU area, future development has the potential to result in the loss of resources, which would be a significant impact at the program--level.

Mitigation Framework

Future commercial, business park and industrial development project types that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that there are no archaeological resources present on the

project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Historical Archaeological Resources further detailed below.

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

INITIAL DETERMINATION

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

STEP 1:

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

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

architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

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

STEP 2:

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

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

STEP 3:

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

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

STEP 4:

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

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

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

STEP 5:

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

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission’s Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.

b. Historic Buildings, Structures, and Objects

Impact

Due to the number and density of prehistoric and historical resources in the CPU area, future development has the potential to result in the loss of resources, which would be a significant impact at the program-level.

Mitigation Framework

HIST-2: Prior to issuance of any permit for a future development project implemented in accordance with the CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Historical Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

a. Preparing a historic resource management plan;

b. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);

c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;

d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource; and

e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning~~; and~~.

~~f. Removing industrial pollution at the source of production.~~

Specific types of historical resource reports, outlined in Section III of the HRG, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate

mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

11.4.2 Religious or Sacred Uses

Impact

Please refer to significance of Issue 1.

Mitigation Framework

The Mitigation Framework for religious or sacred uses (Issue 2) would be the same as outlined for Issue 1 - Archaeological Resources. Please refer to Mitigation Framework HIST-1.

11.4.3 Human Remains

Impact

Impacts to known resources and those not yet found and formally recorded could occur anywhere within the CPU. Future grading of original in situ soils could also expose buried human remains. Potential impacts to historical resources associated with construction of projects implemented in accordance with CPU would be considered significant (refer to Issue 1).

Mitigation Framework

The Mitigation Framework for human remains (Issue 3) would be the same as outlined for Issue 1 - Archaeological Resources. Please refer to Mitigation Framework HIST-1.

11.5 Human Health/Public Safety/Hazardous Materials

11.5.1 Health and Safety Hazards

11.5.1.1 Heath Hazards

Impact

Please refer to Section 5.3, Air Quality and Sections 5.6.4 and 5.6.5 for a discussion of exposure to health hazards. As indicated in those sections, hazardous sites have been identified that could result in significant impacts to future development within the CPU area.

Mitigation Framework

Please refer to Sections 5.3, 5.6.4, and 5.6.5. In accordance with the CPU policies, mitigation identified in Sections 5.3, 5.6.4, and 5.6.5 shall be required to reduce potential health hazards to future development from hazardous sites. Please refer to ~~mitigation~~ Mitigation F~~f~~rameworks AQ-3, AQ-4 and HAZ-3.

11.5.1.2 Wildfire Hazards

Impact

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and CPU contain goals and policies to be implemented by the City's Fire-Rescue Department and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires.

Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards.

Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code.

However, because of the existing and proposed land use patterns around which the community is formed, new development in the wildland interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact. Therefore, impacts associated with wildfires would be significant at the program-level.

Mitigation Framework

HAZ-1: Future projects implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and CPU policies intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.

11.5.1.3 Aircraft Hazards

Impact

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

Mitigation Framework

HAZ-2: To prevent the development of structures that may pose a hazard to air navigation, the City shall inform project applicants for future development concerning the existence of the Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. The City shall also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City shall not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Also, the City shall not recommend approval of subsequent development projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

11.5.2 Hazardous Sites

Impact

The presence of sites compiled pursuant to Government Code Section 65962.5, along with any unknown hazardous sites, would have potentially significant impacts on future development and land uses within the CPU area.

Mitigation Framework

In accordance with CPU policies 6.11-1 and 6.11-2, future projects implemented in accordance with the CPU shall be required to identify potential conditions which require further regulatory oversight and demonstrated compliance based on the following measures prior to issuance of any ministerial permit:

HAZ-3:

a. A Phase I Site Assessment shall be completed in accordance with federal, state, and local regulations for any property identified on a list compiled pursuant to Government Code Section 65962.5. The report shall include an existing condition survey, detailed project description, and specific measures proposed to preclude upset conditions (accidents) from occurring. If hazardous materials are identified, a Phase II risk assessment and remediation effort shall be conducted in conformance with federal, state, and local regulations.

b. The applicant shall retain a qualified environmental engineer to develop a soil and groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The groundwater management and monitoring plans shall be approved by the City prior to development of the site.

c. The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by the local regulatory agencies (RWQCB/DTSC/DEH) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.

d. The applicant shall obtain written authorization from the regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation. A copy of the authorization shall be submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEH shall be notified of the proposed land use.

e. All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with applicable regulatory agencies such as but not limited to San Diego Municipal Code Section 42.0801, Division 9 and Section 54.0701.

11.6 Hydrology/Water Quality

11.6.1 Runoff

Impact

Buildout in accordance with the CPU would result in an increase in impervious surfaces and associated increased runoff, and result in alterations to on- and off-site drainage. Therefore, implementation of the CPU has the potential to result in significant direct and indirect impacts associated with runoff and alternations to on- and off-site drainage patterns.

Mitigation Framework

HYD/WQ-1: Prior to approval of development projects implemented under the CPU, the applicant shall demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate all practicable measures as further outlined below in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

a. San Diego RWQCB

- Comply with all NPDES permit(s) requirements, including the development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.

- If a future project includes in-water work, it shall require acquiring and adhering to a 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW).

- Comply with the San Diego RWQCB water quality objectives and bacteria TMDL.

b. City of San Diego

- To prevent flooding, future projects shall be designed to incorporate any applicable measures from the City of San Diego LDC. Flood control measures that shall be incorporated into future projects within a SFHA, or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following

requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC.

- In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13).

- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the Special Flood Hazard Area, the developer shall obtain a Conditional Letter of Map Revision from FEMA.

- Fill placed in the Special Flood Hazard Area for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials (ASTM) Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.

- The applicant shall denote on the improvement plans “Subject to Inundation” all areas lower than the base elevation plus two feet.

- If the structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, the applicant must obtain a Letter of Map Revision based on Fill (LOMR-F) prior to occupancy of the building. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.

- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:

    - Stream scour is minimized.

    - Erosion protection is provided.

    - Water flow velocities are maintained as specified by the City Engineer.

    - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.

  - Wildlife habitat and corridors are maintained.
  - Groundwater recharge capability is maintained or improved.

- Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:
  - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
  - The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.
  - Grading and filling are limited to the minim amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained.
  - The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.
  - There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.

11.6.2 Natural Drainage System

Impact

Buildout in accordance with the CPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. Therefore, implementation of the CPU has the potential to result in potentially significant direct and indirect impacts to the natural drainage system.

Mitigation Framework

See **HYD/WQ-1** shown above.

11.6.3 Flow Alteration

Impact

Future development within the CPU area would potentially impact the existing course and flow of flood waters, resulting in potentially significant impacts.

Mitigation Framework

See **HYD/WQ-1** shown above.

11.6.4 Water Quality

Impact

Adherence to federal, state, and local regulations, would serve to reduce significant impacts to a degree, but cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Therefore, impacts associated with water quality would be significant at the program-level.

Mitigation Framework

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

Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;

- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego Regional Water Quality Control Board and Municipal Code Compliance

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Stormwater Regulations.
- In accordance with the City of San Diego Stormwater Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

11.7 Geology/Soils

11.7.1 Geologic Hazards

Impact

The CPU area contains geologic conditions which would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to compressible soils, landslides, seismicity (faults), and expansive soils represent a potentially significant impact for future development.

Mitigation Framework

GEO-1: Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

More specifically, compressible soils impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Future development

shall also be required to clean up deleterious material and properly moisture, condition, and compact the soil in order to provide suitable foundation support.

Regarding impacts related to expansive soils, future development shall be required to implement typical remediation measures, which shall include placing a minimum 5-foot cap of low expansive (Expansion Index [EI] of 50 or less) over the clays; or design of foundations and surface improvements to account for expansive soil movement.

11.7.2 Erosion

Impact

Based on the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPU area, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys.

Mitigation Framework

GEO-2: As part of the future development permitting process, the City shall require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPU shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer.

Submittal, review and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPU to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the following measures to control erosion during and after grading or construction:

- Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;
- Short-term measures, such as sandbag placement and temporary detention basins;
- Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and
- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved SWPPP that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer. Measures designed to reduce erosion at the project-level shall include the following:

- Control erosion by minimizing the area of slope disturbance and coordinate the timing of grading, resurfacing, and landscaping where disturbance does occur.
- On sites for industrial activities require reclamation plans that control erosion, where feasible, in accordance with the LDC.
- Control erosion caused by storm runoff and other water sources.
- Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, insure public safety, provide aesthetic enjoyment, and protect biological resources.
- Replant with native, drought-resistant plants to restore natural appearance and prevent erosion.
- Practice erosion control techniques when grading or preparing building sites.
- Utilize ground cover vegetation when landscaping a development in a drainage area to help control runoff.
- Incorporate sedimentation ponds as part of any flood control or runoff control facility.
- During construction, take measures to control runoff from construction sites. Filter fabric fences, heavy plastic earth covers, gravel berms, or lines of straw bales are a few of the techniques to consider.

- Phase grading so that prompt revegetation or construction can control erosion. Only disturb those areas that will later be resurfaced, landscaped, or built on. Resurface parking lots and roadways as soon as possible, without waiting until completion of construction.

- Promptly revegetate graded slopes with groundcover or a combination of groundcover, shrubs, and trees. Hydroseeding may substitute for container plantings. Groundcovers shall have moderate to high erosion control qualities.

- Where necessary, design drainage facilities to ensure adequate protection for the community while minimizing erosion and other adverse effects of storm runoff to the natural topography and open space areas.

- Ensure that the timing and method of slope preparation protects natural areas from disturbance due to erosion or trampling. The final surface shall be compacted and spillovers into natural areas shall be avoided.

- Plant and maintain natural groundcover on all created slopes.

When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official.

In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site.

Section 145.1803 of the San Diego Municipal Code discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS (City of San Diego 2009).

11.8 Noise

11.8.1 Traffic Generated Noise Impacts

Impact

Based on the noise analysis, exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to I-805, SR-905, SR-125, Otay Mesa Road, and Airway Road (see Figure 5.10-3). While the regulatory framework would provide for the maximum practical noise abatement that would be implemented at the project-level, because of the variability of noise sources and the proximity to existing and potential noise

sources in the CPU area, it cannot be guaranteed that future land uses would not expose existing uses to noise levels in excess of City standards. Therefore, impacts related to traffic noise impacts to new residences would be significant.

Mitigation Framework

With implementation of the framework of regulations, standards, and policies, project-level noise protection measures for future subsequent development projects' noise impacts would be reduced. However, it is possible that for certain projects, adherence to the regulations would not adequately reduce noise levels, and therefore, these projects would require additional measures to avoid or reduce significant impacts. Implementation of Mitigation Framework measures NOI-1 and NOI-2 would reduce future development project-level impacts. The identified measures shall be updated, expanded and refined when applied to future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

NOI-1: Prior to the issuance of building permits, site-specific exterior noise analyses that demonstrate that the project would not place residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Impact

There are areas within the CPU area where project traffic noise would potentially cause interior noise levels in existing residences to exceed applicable standards. As these may be older residences, which would not have been constructed to achieve current interior noise standards, there is the potential that project traffic may generate noise levels that exceed current standards at these existing residences. This is a potentially significant impact of the CPU.

Mitigation Framework

NOI-2: Prior to the issuance of building permits, site specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings, placing HVAC in noise reducing enclosures, or designing buildings so that no windows face freeways or major

roadways may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site specific exterior noise analyses.

11.8.2 Stationary Source Noise (Collocation)

Impact

As discussed above, the CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The juxtaposition of these land uses would result in potentially significant noise impacts. While the framework of federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance, no project-level site plans or implementation programs have been considered as part of this PEIR. Without detailed operational data it cannot be verified that compliance with existing regulations would reduce all impacts to below a level of significance. As the degree of success of regulations cannot be adequately known for each project at this program-level of analysis, the program-level impact related to noise from stationary sources would be significant.

Mitigation Framework

The framework of regulations, standards, and policies by the City combined with the federal state and local regulations described above provide a framework for developing project-level noise protection measures for future subsequent development projects implemented in accordance with the CPU. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the CPU.

Operational noise from various land uses could adversely impact adjacent properties, either individually or cumulatively. In general, implementation of the policies included in the CPU and General Plan shall preclude or reduce noise impacts relative to construction noise and collocation issues. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately reduce noise levels, and, as such, would require additional measures to avoid or reduce significant impacts.

For each future development projects requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures shall be identified that reduce significant project-level impacts to below a level of significance or the project-level impact shall remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures shall be included in a future MMRP for the project. Where mitigation is determined to be infeasible, a project shall

not be approved unless all feasible measures have been incorporated into the project design.

The following mitigation measure shall be implemented to reduce project-level impacts and may ensure that on-site generated noise does not exceed the limits of Section 59.5.0101 et seq. of the City's Municipal Code, the Noise Abatement and Control Ordinance. This measure shall be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

NOI-3: Prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. 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 as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site specific noise analyses.

11.8.3 Construction Noise

Impact

As discussed above, implementation of the CPU at the project level has the potential to exceed applicable construction thresholds at future residential properties adjacent to construction sites.

Additionally, there is the potential for construction noise to impact least Bell's vireo, coastal California gnatcatcher, raptors, and other sensitive species if they are breeding or nesting in adjacent MHPA lands. These impacts are significant at the program-level.

Mitigation Framework

The following mitigation measure shall be implemented to reduce project-level impacts. This measure shall be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

NOI-4: For projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction

noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location. Control measures shall include:

a. Minimizing simultaneous operation of multiple construction equipment units;

b. Locating stationary equipment as far as reasonable from sensitive receptors;

c. Requiring all internal combustion-engine-driven equipment to be equipped with mufflers that are in good operating condition and appropriate for the equipment; and

d. Construction of temporary noise barriers around construction sites that block the line-of-sight to surrounding receptors.

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

11.9 Paleontological Resources

Impact

Implementation of the CPU has the potential to result in significant impacts to paleontological resources. Grading would exceed the depth and volume indicated in Table 5.11-1. As such, CPU implementation would result in grading that would impact fossil resources relevant to understanding earth's history, if the fossils are not recovered and salvaged. Specifically, future projects implemented in accordance with the CPU that would involve substantial grading within the San Diego and Otay formations and Very Old Paralic Deposits would result in the loss of significant fossil remains. It should be noted however, that for future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.

TABLE 5.11-1
PALEONTOLOGICAL SIGNIFICANCE THRESHOLDS

Sensitivity Rating	Excavation Volume and Depth Thresholds
High	>1,000 cubic yards and >10 feet deep
Moderate	>2,000 cubic yards and >10 feet deep
Low-Zero	Mitigation not required

Mitigation Framework

For future development project types that are consistent with the OMCP, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources further detailed below.

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

I. Prior to Project Approval

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

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.
- Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.

- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

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

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

11.10 Traffic/Circulation

11.10.1 Capacity

a. Roadway Segments

Impact

A total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at unacceptable LOS. Therefore, the CPU would have a significant impact at all of these 24 roadway segment locations.

Mitigation Framework

At the program-level, impacts shall be reduced through the proposed classifications of roadways and identification of necessary roadway, intersection and freeway improvements. Mitigation or construction of these improvements shall be carried out at the project-level via the Public Facilities Financing Plan and future development projects. Funding shall be

through construction by individual development projects, collection of FBA fees, fair share contributions to be determined at the project-level, and potentially other sources.

The following standards apply to the area designated for commercial and industrial uses as shown in Figure 3-9 (Project Description) within OM-CPIOZ. Future commercial and industrial development applications for properties identified on Figure 3-9 that are consistent with the CPU, the based zone regulations, and these supplemental regulations will be processed ministerially (CPIOZ A) in accordance with the procedures of the CPIOZ (Municipal Code Chapter 13, Article 2, Division 14). Development that complies with all of the following shall be processed as CPIOZ A: Development that includes construction of the abutting street(s) to the street classification identified in the Mobility Element of the Otay Mesa Community Plan and intersection configurations identified in Figures 5.12-4a-g; and development projects that can provide documentation from a California Registered Traffic Engineer, confirmed and accepted by the City Engineer, stating that the proposed project's traffic volumes are based on the City's trip generation rates and are less than 1,000 ADT's.

Development proposals that do not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone shall apply for a Process 3 CPIOZ Type B permit. Applications for a Process 3 CPIOZ Type B permit shall meet the purpose and intent of the regulations of the underlying zone and the supplemental regulations. Deviations from these regulations may be granted by the City Manager in accordance with the procedures of the CPIOZ (Municipal Code Section 132.1403).

Even with incorporation of the recommended street classifications in Table 5.12-4 in the CPU, Public Facilities Financing Plan, and future project development review and (ministerial) and discretionary review through the CPIOZ~~the proposed classifications~~, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition. The TIA identified additional potential improvement measures that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements include various factors such as adjacency to environmentally sensitive land and/or steep hillsides, existing development conflicts, and/or multi-modal and urban design context.~~are detailed in the Findings and the Statement of Overriding Considerations~~. The impacts are considered significant and ~~unavoidable~~unmitigated. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future ~~discretionary~~ subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

The 24 roadway segments that would operate unacceptably in the Horizon Year plus CPU Condition are listed below.

1. Otay Mesa Road, Caliente Ave. to Corporate Center Dr.
2. Otay Mesa Road, Heritage Rd. to Cactus Rd.
3. Airway Road, Caliente Ave. to Heritage Rd.
4. Airway Road, Heritage Rd. to Cactus Rd.
5. Siempre Viva Road, Otay Center Dr. to SR-905
6. Siempre Viva Road, SR-905 to Paseo de las Americas
7. Caliente Avenue, Airway Rd. to Beyer Blvd.
8. Caliente Avenue, Beyer Blvd. to Siempre Viva Rd.
9. Heritage Road/Otay Valley Road, Main St. to Avenida de Las Vistas
10. Heritage Road/Otay Valley Road, Avenida de las Vistas to Datsun St.
11. Cactus Road, Otay Mesa Rd. to Airway Rd.
12. Cactus Road, Airway Rd. to Siempre Viva Rd.
13. Britannia Boulevard, SR-905 to Airway Rd.
14. La Media Road, SR-905 to Airway Rd.
15. Dennery Road, Black Coral Ln. to East End
16. Avenida de las Vistas, Vista Santo Domingo to Dennery Rd.
17. Del Sol Boulevard, Surf Crest Dr. to Riviera Pointe
18. Del Sol Boulevard, Riviera Pointe to Dennery Rd.
19. Old Otay Mesa Road, Crescent Bay Dr. to Beyer Blvd.
20. Camino Maquiladora, Heritage Rd. to Pacific Rim Ct.
21. Camino Maquiladora, Pacific Rim Ct. to Cactus Rd.
22. Progressive Avenue, Corporate Center Dr. to Innovative Dr.
23. Datsun Street, Innovative Dr. to Heritage Rd.
24. Exposition Way/Vista Santo Domingo, Avenida de las Vistas to Corporate Center Dr.

b. Intersections

Impact

A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition. Therefore, the CPU would have a significant impact at all 49 of these intersections.

Mitigation Framework

A total of 49 intersections would be significantly impacted by the CPU. Even w~~W~~ith incorporation of the recommended land configurations shown in Figure 5.12-4a-4g for the 53 intersections analyzed into the projects to be funded through the Public Facilities Financing Plan, and through future development projects (ministerial and discretionary through the CPIOZ~~mitigation measures~~, a total of 39 intersections would continue to be significantly impacted. The TIA identified further potential improvement measures such as additional intersection turning movement lanes that are not recommended as part of the CPU and are not included as part of the project. The reasons for not recommending the improvements include considerations such as adjacency to environmentally sensitive land, steep hillsides,

routes to schools, and multi-modal and urban design context, or because additional study would be required in order to make additional recommendations ~~are detailed in the Findings and Statement of Overriding Considerations~~. At the project-level, partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future ~~discretionary~~ subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

The impacts are considered significant and ~~unavoidable~~unmitigated. To reduce impacts the following mitigation shall be provided:

TRF-1: Intersections shall be improved per the intersection lane designations identified in Figures 5.12-4a-g.

c. Freeway Segments

Impact

With the planned and funded I-805 improvements, all I-805 freeway segments would be expected to operate at an acceptable LOS in the Horizon Year Plus CPU condition and therefore impacts would be less than significant. Five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition. Thus, the CPU impact at these five SR-905 freeway segments would be significant.

Mitigation Framework

While providing one HOV lane in each direction on the SR-905 would reduce impacts associated with buildout of the CPU, the additional lanes are not funded; therefore, impacts would remain significant and ~~unavoidable~~ unmitigated at the programmatic level. At the project-level, partial mitigation may be possible in the form of auxiliary lanes, and/or transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future ~~discretionary~~ subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

d. Freeway Ramp Metering

Impact

Five SR-905 freeway ramps would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition. The CPU impact at these five freeway ramps would be significant.

Mitigation Framework

Mitigation that would reduce freeway ramp metering impacts at the five significantly impacted SR-905 locations consists of adding a lane to the freeway on-ramp, auxiliary lanes, and/or implementation of transportation demand management (TDM) measures that encourage carpooling and other alternate means of transportation. At the time future ~~discretionary~~ subsequent development projects are proposed, project-specific traffic analyses would contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact.

However, due to the uncertainty associated with implementing freeway ramp improvements, and uncertainty related to implementation of TDM measures, the freeway ramp impacts associated with the CPU would remain significant and ~~unavoidable~~ unmitigated at the program-level.

11.11 Utilities

11.11.1 Solid Waste

Impact

The CPU would not result in the direct need for a new landfill. Compliance with the Storage, Recycling, and C&D ordinances and the requirement to prepare a WMP (in some instances) would contribute to the CPU meeting the state-mandated 75 percent diversion rate. However, because all future projects within the CPU area may not be required to prepare a WMP or may not reduce project-level waste management impacts to below a level of significance, the CPU cannot be guaranteed, at the program-level, to meet the 75 percent diversion requirement. Direct impacts associated with solid waste would be significant at the program-level.

Mitigation Framework

UTIL-1: Pursuant to the City's Significance Determination Thresholds, future subsequent development projects (including construction, demolition, and /or renovation) that would

generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the ESD and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).

b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).

c. Type of waste to be generated (demolition, construction, and occupancy).

d. Describe how the project will reduce the generation of C&D debris.

e. Describe how the C&D materials will be reused on-site.

f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.

g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.

h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.

i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.

j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.

k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.

l. Describe any International Standards of Operation 1, or other certification, if any.

11.12 Greenhouse Gas Emissions

11.12.1 Consistency with Adopted Plans, Policies, and Regulations

Impact

The CPU contains policies that would reduce GHG emissions from transportation and operational building uses (related to water and energy consumption, and solid waste generation, etc.) and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations. However, because project-level details are not known, there is the potential that projects would not meet the necessary City reduction goals put in place in order to achieve the reductions required by AB 32. Thus, the level of potential impacts associated with plan conflict would be significant.

Mitigation Framework

GHG-1: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Mobility, Urban Design, and Conservation elements of the CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate-sensitive community design. These policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to BAU.

Future projects implemented in accordance with the CPU shall be required to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to BAU, to meet AB 32 year 2020 target levels. Quantifiable GHG reduction measures at the level of subsequent projects consist of:

- Building and non-building energy use
- Indoor and outdoor water use
- Area sources
- Solid waste disposal
- Vegetation/carbon sequestration
- Construction equipment
- Transportation/vehicles

11.12.2 Cumulative GHG Emissions

Impact

The 9.1 to 11.4 percent reductions relative to BAU fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to BAU, and therefore impacts associated with GHG emissions under the CPU would be significant and unavoidable.

The Mobility, Urban Design, and Conservation elements of the CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate-sensitive community design. These policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to BAU. These policies are discussed in detail in Section 5.18.3.

Despite the inclusion of these policies (most of which are not quantifiable in terms of their GHG emissions reductions at the program level), and despite the GHG reductions gleaned from statewide regulations on vehicle GHG emissions and building energy and water use, the CPU's projected GHG emissions would fall short of meeting the 28.3 percent GHG reduction target relative to 2020 BAU.

Mitigation Framework

GHG-2: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation measure GHG-1 in Section 5.18.3.3.

The approximate gap of 16.9 to 19.2 percent in meeting the target reductions shall consist of one or a combination of several effective and quantifiable GHG reduction measures that pertain to: building and non-building energy use; indoor and outdoor water use; area sources; solid waste disposal; vegetation/carbon sequestration; construction equipment; and transportation/vehicles. Project-level GHG reduction design features shall demonstrate a reduction in BAU GHG emissions to 28.3 percent or more relative to BAU, and to the extent practicable, shall be required for future development projects implemented in accordance with the CPU.

12.0 References

The following documents were used, referenced, or relied on in preparing this EIR, and the documents are available for public review and inspection at the City of San Diego. Some documents are additionally available for review on the City of San Diego website page at www.sandiego.gov.

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14.0 Certification

This document has been completed by the City's Environmental Analysis Section under the direction of the Development Services Department Deputy Director and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

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