THE CITY OF SAN DIEGO

ADDENDUM TO A PROGRAM ENVIRONMENTAL IMPACT REPORT

Project Number: 555609
Addendum to PEIR No. 30330/304032
SCH No. 2004651076

SUBJECT: LUMINA TENTATIVE MAP, RIGHT-OF-WAY VACATION, EASEMENT VACATION, NEIGHBORHOOD DEVELOPMENT PERMIT, SITE DEVELOPMENT PERMIT, AND MHPA BOUNDARY LINE ADJUSTMENT: COUNCIL APPROVAL to adopt the Lumina Tentative Map for a 93.4-acre portion of the Central Village Specific Plan, within the Otay Mesa Community Plan. The Project would allow for the future development of up to 1,868 multi-family homes and 62,525 s.f. square feet of commercial uses, along with supporting recreational areas, open space, and a combined school/recreation site, and vacation of an unimproved 0.3-acre portion of an unnamed road dedicated per Map 1267.

Applicant: CR Lumina Group, LLC

I. PROJECT DESCRIPTION

The Project Applicant proposes a Tentative Map (TM) (Tentative Map No. 1972222) that includes a public Right-Of-Way (ROW) Vacation, Easement Vacation, Neighborhood Development Permit (NDP), and Site Development Permit (SDP) for a 93.4-acre site located within the Central Village Specific Plan (CVSP) portion of the Otay Mesa community.

Figure 1, *Tentative Map No. 1972222*, depicts the proposed TM, while Table 1, *Tentative Map 1972222 Lot Summary*, provides a summary of the lots that would be established as part of the TM. As indicated in Table 1, TM 1972222 would establish nine (9) lots for "Medium High Density Mixed-Use" land uses on 31.01 acres; four (4) lots for "Medium Density Multi-Family" on 16.91 acres; one (1) lot for "Low Density Multi-Family" on 5.84 acres; two (2) "Park" lots on 7.06 acres; three (3) lots for "School/Recreation" land uses on 6.28 acres; two (2) lots for Homeowners' Association (HOA)-maintained "Bio-Filtration Basins" on 4.26 acres; one (1) lot for HOA-maintained "Slope Area" on 2.38 acres; one (1) lot for "Open Space" on 2.72 acres; one (1) "Central Recreation Area" lot on 0.77 acre; and public streets on approximately 16.20 acres.

Figure 2, *Land Use Plan*, depicts the portions of the CVSP that would be encompassed by TM 1972222. As shown on Figure 2, and for purposes of analysis herein, Lumina TM 1972222

Table 1 Tentative Map 1972222 Lot Summary

Lot No.	Area (Acres)	Land Use
Lot 1	6.11	Medium High Density Mixed-Use
Lot 2	4.19	Medium High Density Mixed-Use
Lot 3	4.17	Medium High Density Mixed-Use
Lot 4	3.93	Medium High Density Mixed-Use
Lot 5	2.89	Medium High Density Mixed-Use
Lot 6	3.32	Park
Lot 7	3.29	Medium High Density Mixed-Use
Lot 8	1.90	Medium High Density Mixed-Use
Lot 9	2.04	Medium High Density Mixed-Use
Lot 10	2.49	Medium High Density Mixed-Use
Lot 11	4.38	Medium Density Multi-Family
Lot 12	3.06	Medium Density Multi-Family
Lot 13	4.44	Medium Density Multi-Family
Lot 14	5.03	Medium Density Multi-Family
Lot 15	2.32	School/Recreation Site
Lot 16	1.53	School/Recreation Site
Lot 17	2.43	School/Recreation Site
Lot 18	3.74	Park
Lot 19	5.84	Low Density Multi-Family
Lot 20	2.29	Bio-Filtration Basin (HOA)
Lot 21	2.38	Slope Area (HOA)
Lot 22	1.97	Bio-Filtration Basin (HOA)
Lot 23	2.72	Open Space Area
Lot 24	0.77	Central Recreation Area
--	16.2	Public Streets
Total:	**93.43**	--

would implement portions of the CVSP and would allow for the future construction of up to 1,868 dwelling units and 62,525 square feet (s.f.) of community commercial land uses. This includes 1,129 "Medium-High Mixed Use" dwelling units on 32.6 acres within CVSP Planning Areas 3, 4, and 9; 526 "Medium Density Multi-Family" dwelling units on 17.8 acres within CVSP Planning Area 5; 213 "Low Density Multi-Family" dwelling units on 10.7 acres within CVSP Planning Area 8; "School/Recreation" uses on 6.3 acres within CVSP Planning Area 14; 6.6 acres of "Parks" within CVSP Planning Areas 16 and 18; and 16.2 acres of public streets. Commercial land uses would be collocated with residential land uses within CVSP Planning Areas 3, 4, and 9. Consistent with the population generation factors used in the OMCPU, development of the Project site with up to 1,868 residential dwelling units would generate a future population increase of approximately 6,445 persons, utilizing the OMCPU's person per household (pph) ratio of 3.45 (1,868 dwelling units x 3.45 pph = 6,445 future residents) (City of San Diego, 2014a, p. LU-17; Table 2-5).

As shown on Figure 3, *Proposed Right-of-Way Vacation*, TM 1972222 also proposes to vacate an unconstructed unnamed road on-site that was previously dedicated pursuant to Map 1267. The ROW to be abandoned is for a north-south oriented unnamed road that is not needed to serve future development within the CVSP, and the existing alignment of this roadway would otherwise bisect residential Planning Area 3 and school/recreation Planning Area 14. North-south access in the area would instead be provided by proposed Village Way, which is accommodated by TM 1972222 and is located east of the existing ROW that would be vacated as part of the Project.

The Project also proposes to vacate 0.4 acre of an existing 28-foot wide easement for road and utility purposes on site that was previously recorded on February 19, 1970, in Book 257, Page 37 of Deeds. The easement to be vacated is an east-west oriented easement for road and utility purposes that was never utilized for road and utility purposes and is not needed to serve future development within the CVSP. The existing easement would otherwise bisect residential Planning Area 8 of the CVSP. Access and utilities would instead be provided through the utilities and roadway network included in the approved CVSP, which is accommodated by TM 1972222.

The Project also proposes an NDP solely for the purpose of processing this EIR Addendum, as required by the CVSP. The proposed NDP does not allow for construction of any structures on-site.

The Project also proposes an SDP due to Environmentally Sensitive Lands (ESL) occurring on the Project site and due to the Project's impacts related to the removal of land from the MHPA, which was reviewed by the Wildlife Agencies as part of an MHPA Boundary Line Adjustment (BLA). The Project site supports maritime succulent scrub, Diegan coastal sage scrub, non-native grassland, agriculture, disturbed, and urban/developed land. Maritime succulent scrub, Diegan coastal sage scrub, and non-native grassland are recognized as sensitive habitat. Proposed development of the Project site would result in impacts to sensitive habitat located within the MHPA and outside of the MHPA.

On-site improvements associated with TM 1972222 include improvements to Airway Road between the western Lumina boundary (west of Village Way) to Cactus Road. Off-site improvements associated with TM 1972222 include half-width improvements to Cactus Road, improvements to Airway Road between Cactus Road and Britannia Boulevard, and off-site sewer and storm drain improvements. Each is discussed below.

- **Cactus Road Improvements.** To the north of Airway Road, and consistent with the CVSP, Cactus Road would be improved to its ultimate half-width section as a "Four-Lane Major (126-foot ROW)," which would provide for 64 feet of travel way along the southbound side of the road and 19 feet of travel way along the northbound side, a 6-foot wide raised median nose, an asphalt concrete (AC) berm along the eastern edge of the road, and a six-foot wide non-contiguous sidewalk within a 12-foot parkway along the Project boundary. To the south of Airway Road, and also consistent with the CVSP, Cactus Road would be improved to its ultimate half-width as a "Four-Lane Major Arterial (114-foot ROW)," including 19 feet of travel way along the northbound side of the road

and 30 feet of travel way along the southbound side, a 16-foot wide raised median, and 8-foot wide non-contiguous sidewalk within a 26-foot wide parkway.

- **Airway Road Improvements.** To the west of Cactus Road, Airway Road would be improved as a "Six-Lane Primary Arterial" along the Project's frontage with a total ROW width of 162 feet, with a 27-foot wide parkway on the eastbound side of the roadway accommodating a 6-foot wide non-contiguous sidewalk with a Class I bike path to be constructed by the Lumina Project and a 17-foot wide parkway on the westbound side of the roadway accommodating a 6-foot wide non-contiguous sidewalk. Between Cactus Road and Britannia Boulevard, Airway Road would be improved for access purposes as a traffic mitigation measure to provide between 70 and 96 feet of travel way with AC berms along both sides of the roadway. The segment of Airway Road east of Cactus Road ultimately would additionally be improved by others as a "Six-Lane Urban Major (139-foot ROW)."

- **Off-Site Sewer and Drainage Improvements:** Off-site improvements for sewer facilities include construction of a new 18-inch sewer main in Cactus Road between proposed Street C and Siempre Viva Road. The proposed 18-inch sewer main would connect to existing Sewer Pump Station 23T. Off-site improvements for sewer facilities would also include construction of a 24-inch sewer force main within Cactus Road that would connect to existing Sewer Pump Station 23T. Off-site stormwater drainage improvements associated with the Project include construction of stormwater drainage lines within Airway Road from the Project boundary to a connection point located east of the Airway Road and Cactus Road intersection; and construction of stormwater drainage facilities within Cactus Road extending from south of Central Main Street to north of Siempre Viva Road, where flows would then drain to the Project's proposed on-site biofiltration detention basin located in proposed Lot 20.

Future discretionary actions would be required to implement the proposed Project. As required by the CVSP, a Process Two Neighborhood Development Permit (NDP) would be required, which would establish site design, building orientation, building elevations, building floor plans, walls/fencing, and landscaping. Additionally, if sale of individual dwelling units is proposed as part of future development applications, then a Condominium Parcel Map also may be required.

II. ENVIRONMENTAL SETTING

The environmental setting of the Project site is substantially the same as described in the OMCPU Final EIR. Figure 4, *Aerial Photograph*, depicts the existing conditions of the 93.4-acre Project site. Based on historical aerial photographs, large portions of the site have been used for agricultural production since at least the early 1990s (Google Earth, 2018). The majority of the subject property, particularly in the northern portions of the site (west of Cactus Road), is used for crop production (oats). Along Cactus Road in the southern portions of the property are greenhouses and goat husbandry. Along the southern and northern boundaries of the site are of open space areas and natural drainages that feed into Spring Canyon. Under existing conditions, and consistent with the conditions that existed at the time the OMCPU was adopted in 2014, Cactus Road is improved as a two-lane roadway with

limited non-contiguous sidewalks on the northbound side of the roadway, no sidewalks on the southbound side of the roadway, and no curb and gutter facilities on either side of the roadway, while the portion of Airway Road east of Cactus Road also is improved as a two-lane facility with no sidewalks and no curb and gutter facilities.

As shown in Figure 5, *Regional Map*, the Project site is located in the southeastern portion of the City of San Diego, within the Otay Mesa community. As shown in Figure 4, surrounding land uses include a mixture of open space, undeveloped lands, agricultural uses (located within the approved CVSP area), and light and heavy industrial uses. Specifically, areas to the west of the Project site consist of undeveloped agricultural land that is planned for future development with residential and commercial mixed uses pursuant to the CVSP. To the north of the Project site is open space associated with Spring Canyon, light industrial developments, and State Route 905 (SR-905). Land uses to the east consist of a mixture of undeveloped lands (some located within the approved CVSP), light industrial uses (auto auction), and greenhouses and agricultural uses. To the south of the Project site is open space and existing light and heavy industrial land uses. The United States-Mexico international border is located approximately 0.5 mile south of the Project site.

III. PROJECT BACKGROUND

The City of San Diego General Plan provides the citywide vision for growth and a comprehensive policy framework to implement that vision. The City's General Plan Land Use Element identifies 55 Community Plans (including the Otay Mesa Community Plan), which provide community scale policy recommendations for specific geographic areas of the City. The Land Use Element identifies the City of Villages strategy as the implementing tool to guide the City's growth within the context of the community planning program. This strategy aims to create mixed use villages throughout the City that are connected by high-quality transit.

The Otay Mesa Community Plan (OMCP) was first adopted by the San Diego City Council in 1981, and was intended to guide development of the area through the year 2000. Figure 5, depicts the location of the Otay Mesa community in relation to the surrounding region. The OMCP's principal goals included annexing portions of Otay Mesa into the City of San Diego, coordinating development of the Otay Mesa Port of Entry, increasing employment opportunities, creating residential communities, and providing amenities for employees and residents. The Community Plan called for residential and supporting commercial development in western Otay Mesa with industrial development and limited commercial uses in the central and eastern portions of the community surrounding Brown Field. Since that time, Otay Mesa's location just north of the U.S. / Mexico border has allowed portions of the community to develop into a thriving bi-national regional center. Furthermore, since that time, per the goals of the Otay Mesa Community Plan, portions of Otay Mesa were annexed into the City of San Diego.

In March 2014, the City of San Diego adopted an Update to the Otay Mesa Community Plan (OMCPU) to provide for broad land use themes that seek to establish a bi-national center; provide for economic diversification; enhance and sustain Otay Mesa's industrial capacity; encourage and support international trade; promote the establishment of balanced neighborhoods that integrate a mix of land uses; and identify infrastructure needs. Concurrent with the adoption of the OMCPU, the City also certified a Program Environmental Impact Report (EIR; State Clearinghouse [SCH] No. 2004651076).

The OMCPU established five distinct Districts that pertain to specific geographic areas within the Otay Mesa community. The Central District is described by the OMCPU as having a village center at the western end of the mesa (i.e., the "Central Village" area) that is predominately residential in nature with core areas of mixed uses and public spaces sited along Airway Road. OMCPU Subsection 2.1, Specific Plan Areas, requires the adoption of a specific plan (the "Central Village Specific Plan (CVSP)") to provide for the systematic implementation of the CVSP area in accordance with the vision, goals, and policies of the OMCPU for the Central Village area. In April 2017, the City of San Diego adopted the CVSP to provide for the systematic implementation of the CVSP area in accordance with the vision, goals, and policies of the OMCPU for the Central Village area. Concurrent with the adoption of the CVSP, the City also adopted an Addendum to the OMCPU EIR.

The CVSP establishes land use designations within the Central Village community. Figure 2, previously referenced, depicts the location of the Lumina Project in relation to the CVSP Land Use Plan. As shown in Figure 2, the CVSP designates the 93.4-acre Project site for residential and commercial mixed-uses along Airway Road, multi-family residential uses, school/recreation uses, park uses, and open space uses. CVSP Section 3.5, Construction and Development Permits, requires that all development permits proposed with the CVSP comply with the applicable requirements of the San Diego Municipal Code to provide for implementation in accordance with City of San Diego review requirements. The CVSP also requires a Process Two Neighborhood Development Permit (NDP) be processed by the City of San Diego prior to the issuance of any construction permit in order to ensure consistency between a proposed implementing project and the CVSP.

Figure 6,*Vicinity Map,* depicts the location of the Lumina Project in relation to the surrounding areas. As shown, the Project is located west of Cactus Road, and north and south of Airway Road. State Route (SR) 905 abuts the Central Village to the north, while Siempre Viva, an east to west oriented roadway, terminates at Cactus Road at the southeastern boundary of the Project area.

IV. DETERMINATION

The City of San Diego previously prepared a Program EIR for the OMCPU, which encompasses the Project area, and the conclusions of the OMCPU Final EIR are attached to this Addendum. A detailed description of the Project evaluated herein is provided in the attached Environmental Checklist, Section I.

Based on a review of the current Project, it has been determined that:

a. There are no new significant environmental impacts not considered in the previous EIR;
b. No substantial changes have occurred with respect to the circumstances under which the project is undertaken; and
c. There is no new information of substantial importance to the project.

Therefore, in accordance with Section 15164 of the State CEQA Guidelines, this Addendum has been prepared. No public review of this Addendum is required.

V. IMPACT ANALYSIS

This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the Project are consistent with or less than the impacts disclosed in the previously certified OMCPU EIR. The following includes the

environmental issues analyzed in detail in the OMCPU EIR as well as the Project-specific analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the OMCPU EIR relative to the Project. The following analysis documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the 2014 OMCPU EIR.

This Addendum tiers from the OMCPU EIR, and as such threshold questions used throughout this EIR Addendum are based on the threshold questions used in the OMCPU EIR rather than the threshold questions included in Appendix G to the CEQA Guidelines or the City's *Significance Determination Thresholds* (July 2016). Notwithstanding, the methodology for determining the significance of the Project's impacts under each threshold question varies in some cases from the methodology used for determining the significance of impacts by the OMCPU EIR. For example, the methodology for evaluating the significance of Project impacts to transportation/traffic relies on the City's *Significance Determination Thresholds*, rather than the methodology used in the OMCPU EIR. Additionally, the issue area of Greenhouse Gas Emissions is evaluated separately, which is explained separately under the issue area of Greenhouse Gas Emissions. This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the Project are consistent with or less than the impacts identified in the previously certified OMCPU EIR; thus, the same thresholds were utilized for the impact analysis herein. It should be noted that the significance thresholds used by the certified OMCPU EIR (and utilized in this Addendum) include modifications to the City's CEQA significance thresholds checklist, and were tailored to reflect the environmental conditions of the OMCPU area and pertinent environmental issues that were applicable to the OMCPU in order to provide a more focused scope of environmental analysis. The OMCPU EIR was certified in 2014 with the modified set of significance thresholds. Thus, it is appropriate and necessary for this Addendum to apply the same significance thresholds used by the certified OMCPU EIR for analysis herein, except as explained above for Transportation/Circulation and Greenhouse Gas Emissions.

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LAND USE

Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project?

OMCPU EIR

The 2014 Otay Mesa Community Plan Update (OMCPU) EIR found that the OMCPU's goals, policies, and programs are consistent with the land use plans, policies, and regulations of the City's General Plan; Land Development Code; Brown Field Airport Land Use Compatibility Plan; and the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan. Accordingly, the OMCPU EIR concluded that the OMCPU would have a less-than-significant impact due to conflicts with other planning documents and no mitigation would be required. (City of San Diego, 2014b, pp. 5.1-38 through 5.1-46)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project is located within the boundary of the Central Village Specific Plan (CVSP) and the Project would be fully consistent with the CVSP. The CVSP implements the City's General Plan, the City's Climate Action Plan (CAP), and the OMCPU, which are policy documents with applicability to the geographic area of the Project site. Thus, because the Project would be consistent with the CVSP, the Project would also be consistent with all other applicable policy documents with jurisdiction over the Project. Future implementing development projects on the Project site also would be required to comply with the CVSP. There are no components of the proposed Project that would obviate the need for future implementing developments within the CVSP to also demonstrate compliance with the General Plan, CAP, OMCPU, and CVSP. Moreover, because the CVSP is consistent with the General Plan and OMCPU, the Project is thus inherently consistent with applicable land use plans, policies, and regulations, including but not limited to the General Plan, OMCPU, and CVSP. Accordingly, the Project would not conflict with the land use plans, policies, and regulations of the City's General Plan, OMCPU, and CVSP; Land Development Code; Brown Field Airport Land Use Compatibility Plan; and/or the SANDAG Regional Comprehensive Plan.

Furthermore, the proposed Project would be consistent with the City's CAP, which is applicable to the Project area. Please refer to the discussion of thresholds under the Greenhouse Gas Emissions Subsection of this document for a more detailed analysis of the proposed Project's consistency with the City of San Diego CAP.

Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated with a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the Project, create land use incompatibilities or

result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development?

OMCPU EIR

The OMCPU EIR found that the OMCPU's land use plan would locate residential land uses in close proximity to industrial uses, which would result in potential impacts associated with the collocation of incompatible land uses. The OMCPU EIR anticipated that the CVSP would incorporate transitional land uses, such as commercial uses, and also landscaping, parking, and setbacks, in the interface area and that the residential uses would then be separated from industrial uses. Additionally, the OMCPU EIR noted that 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. Moreover, the OMCPU EIR found that there are various policies contained within the OMCPU that would serve to limit incompatibilities at the interface between residential and industrial uses and that would 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 OIMCPU EIR found that the OMCPU would minimize land use conflicts and preserve the most important types of industrial land within the OMCPU area. The OMCPU EIR concluded that with implementation OMCPU policies and performance standards, potential impacts associated with the collocation of incompatible land uses would be reduced to less-than-significant levels.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project would be developed with residential, commercial, and recreational land uses in accordance with the CVSP. The proposed Project would locate residential land uses in close proximity to off-site industrial uses to the east and southeast. Future residential land uses associated with the Project would be physically separated from industrial uses to the east of the Project site by Cactus Road and from industrial uses to the south by open space.

Furthermore, future development associated with the Project would be required to comply with CVSP policies and design standards that were adopted to avoid and reduce potential impacts resulting from the collocation of on-site residential land uses with off-site industrial land uses. For example, the following policy is incorporated into the CVSP to address collocation of on-site residential and off-site industrial uses, and would apply to future development that would result from Project approval (T&B Planning, 2017):

Policy 2.5-44 Address the challenges presented by the collocation of industrial and residential uses by implementing the following design strategies:

- Provide landscape screening and/or patio walls to reduce noise impacts and protect the privacy of residential units along high traffic streets and intense uses.
- Address noise through the use of berms, planting, setbacks, and architectural design rather than with conventional wall barriers for generating uses.

- Minimize the number of residential units that have window and door openings that afford views into adjacent industrial uses located east of the Central Village. Whenever possible, orient the short end of buildings towards industrial uses.

Additionally, the Project would be required to comply with the following Design Standard from the CVSP, which was adopted to preclude localized air quality impacts to future residents from the SR-905 as well as from nearby light and heavy industrial developments located east and south of the Project site (T&B Planning, 2017):

Design Standard 2.2-11: Mechanical air quality filtration systems shall be required for residential units in Planning Areas 9, 10, 11, 12, and 13 (the planning areas closest to SR-905) and for residential units in Planning Areas 5 and 8 that are within 500 feet of the Specific Plan's eastern and southern boundary lines (the planning areas closest to off-site light and heavy industrial uses) as part of implementing development projects. The filtration systems shall have at least a Maximum Efficiency Reporting Value (MERV) of 13. These systems are required to improve indoor air quality in areas of the Specific Plan that could be most affected by vehicular-related air pollutant emissions along SR-905 and nearby stationary sources associated with off-site industrial land uses.

As previously indicated, a Neighborhood Development Permit (NDP) would be required prior to development on the Project site. The City would review the implementing NDP for conformance with all applicable policies and design standards of the OMCPU and the CVSP, including policies and design standards adopted to address collocation of residential and industrial land uses. Furthermore, as part of the implementing NDP and/or building permits, the Project Applicant would be required to prepare a noise study to identify noise abatement measures to address traffic-related noise along Cactus Road and Airway Road, as required by General Plan Policy NE-A.4 and OMCPU Policy 9.2-2.

Consistent with the findings of the OMCPU EIR, mandatory compliance with the OMCPU and CVSP design standards and policies would ensure that the residential uses proposed by the Project are compatible with surrounding industrial land uses. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact associated with the collocation of residential and industrial uses, or with the conversion of agricultural lands to a residential community, as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU would not conflict with the intent and purpose of the Brush Management regulations of the LDC; however, the OMCPU EIR found that the OMCPU would have the potential to conflict with the intent and purpose of the ESL regulations and the Historical Resources regulations. The OMCPU EIR concluded that with implementation of

Mitigation Frameworks LU-1a and LU-1b, generally requiring development proposals to be consistent with the OMCPU, base zone regulations, and CPIOZ Type A supplemental regulations, and requiring future implementing developments to demonstrate that there are no biological or archeological resources present on the Project site, the OMCPU EIR concluded that potentially significant impacts due to conflicts with the ESL and Historical Resources regulations would be reduced to below a level of significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project is located within and adjacent to steep hillside areas, and would impact maritime succulent scrub, Diegan coastal sage scrub, and non-native grassland which are considered ESL; however, there are no components of the Project that would conflict with the ESL. The Project would be required to comply with the ESL regulations through the proposed SDP. In accordance with OMCPU EIR Mitigation Framework HIST-2, a Historical Resource Report (*Appendix C2*) was prepared for the Project site. As noted in the Historical Resource Report, the Project would not result in a conflict with the Historical Resources Regulations. In addition, the Project complies with the Brush Management Regulation of the LDC. CVSP Section 2.5.3.5 acknowledges that the San Diego Land Development Code requires that brush management be implemented for buildings that are located within 100 feet of undisturbed vegetation, and all future site-specific discretionary actions would be required to comply with the City's Land Development Code brush management requirements (see San Diego Municipal Code Section 142.0412).

Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact due to a conflict with the purpose and intent of the ESL regulations, the Historical Resources regulations, and the Brush Management regulations of the LDC. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR included an analysis of potential impacts due to a conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan in OMCPU EIR Subsection 5.1, Land Use. As stated in the OMCPU EIR, future development in the OMCPU area may require adjustment(s) to the MHPA boundary; however, potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments were found to be less than significant because any such adjustment must meet the required MHPA boundary line equivalency criteria and would be subject to approval from the Wildlife Agencies (i.e. the United State Fish and Wildlife Service and the California Department of Fish and Wildlife). Additionally, the OMCPU EIR found that potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. The OMCPU EIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations contained in the OMCPU as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level

of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2. (City of San Diego, 2014b, pp. 5.1-58 through 5.1-64)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Implementation of the proposed Project would result in development on-site that is substantially consistent with the OMCPU and CVSP. If a project would encroach into the MHPA beyond the allowable development area pursuant to Sections 143.0142 and 131.0250(b) of the Land Development Code and pages 13-15 of the City's Biology Guidelines, an MHPA boundary line adjustment is required. As a result of the BLA and the Project's impacts to ESL, an SDP application was required for the Project. Under the City's MSCP Subarea Plan, an adjustment to the City's MHPA boundary is allowed only if the new MHPA boundary results in an exchange of lands that are functionally equivalent or higher in biological value. A determination of functionally equivalent or higher biological value is based on site-specific information (both quantitative and qualitative) that addresses six boundary adjustment criteria outlined in Section 5.4.3 of the Final MSCP Plan (City of San Diego, 1997). (Alden, 2019, p. 39)

The Project would maintain the on-site MHPA-designated areas as open space, with the exception of one area where the City of San Diego General Plan and OMCPU call for Airway Road to traverse the MHPA. The portions of the Project site located adjacent to the MHPA boundary would be required to comply with the MSCP in accordance with the OMCPU EIR's Mitigation Framework LU-2, which requires MHPA adjacency impacts to be addressed at the project level. The Project includes a site-specific Biological Technical Report (BTR) (*Appendix B*), which found that the Project would be consistent with the City MSCP Subarea Plan and the MHPA. Additionally, although Airway Road would traverse a portion of the City's MHPA, Airway Road is a Mobility Element-designated facility and was planned to traverse MHPA areas by the OMCPU. Pursuant to the MSCP, Community Plan Mobility Element facilities are allowed to traverse MHPA areas (City of San Diego, 1997, p. 44).

Furthermore, access to Planning Area 9 (and the Airway Road detention basin) from Airway Road is necessary to be from the signalized intersection with Village Way, which results in the private drive on site passing through the MHPA. The private drive is necessary to provide adequate access to the site, including emergency access, and is necessary to be from the signalized intersection with Village Way in order to accommodate the City's Street Design Manual minimum intersection spacing requirements between signalized intersections along Primary Arterial roadways. Additionally, the City's Street Design Manual states that intersections of local roadways (i.e., the private drive) and major streets (i.e., Airway Road) should be kept to a minimum. Thus, the private drive is necessary to be from the signalized intersection with Village Way instead of elsewhere in the area to minimize the number of intersections of local roadways and major streets along Airway Road. The intersection location and storm drain facilities included as part of the Lumina Project are considered supporting features of the ultimate buildout of the OMCPU Circulation Element pursuant to the approved OMCPU and CVSP. Given the City's Street Design Manual requirements for intersection spacing from Cactus Road and minimization of intersections of local roadways and major streets, there is no other location option for the access road. Therefore, the private drive access to Planning Area 9 crossing the MHPA is the result of the City's Street Design Manual requirements and not the result of Lumina Tentative Map Project design. The Project proposes to remove 0.8 acre from the MHPA as part of development of TM Lot 1, which includes the private drive. The Project also

proposes to add 3.1 acres to the MHPA, which would result in a net gain to the MHPA of 2.3 acres and would reduce the mitigation ratios for Project-related impacts. An equivalency analysis for the proposed MHPA removal and the addition of lands contiguous to the MHPA is provided in the BTR *(Technical Appendix B)* Section 8.2.1. (Alden, 2019, pp. 2, 34, 39)

The impacts that would be caused by the Project are within the scope of the OMCPU EIR, and all impacts due to conflicts with adopted environmental plans, such as the MSCP and MSCP Subarea Plan's Land Use Adjacency Guidelines, would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously disclosed in the OMCPU EIR and no further environmental review is necessary for this topic.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Would the Project affect the visual quality of the area, particularly with respect to views from public viewing areas, vistas, or open spaces?

OMCPU EIR

The OMCPU EIR found that there were no scenic vistas or scenic viewing areas identified by the previously-adopted Otay Mesa Community Plan or the City's General Plan for the OMCPU area. Additionally, the OMCPU EIR found that implementation of the OMCPU would preserve a majority of the existing public views of canyons and mesas. In addition, the OMCPU EIR found that the OMCPU requires the establishment of view corridors and gateways to protect views of public resources. As such, the OMCPU EIR concluded that impacts to the visual quality of the area, with respect to views from public viewing areas, vista, and open spaces, would be less than significant. (City of San Diego, 2014b, pp. 5.2-15 through 5.2-20)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project consists of a Tentative Map (TM) to implement a portion of the CVSP. Prior to future development within the TM area, the Project Applicant would be required to obtain a NDP, which would identify plans for site design, building orientation, building elevations, building floor plans, site grading, and landscaping. As part of its review of the future NDP, the City would ensure that all design elements associated with the Project comply with the design standards and policies of the CVSP, including standards and policies related to open space connections and view corridors, architectural design, and landscape design. Mandatory compliance with the policies and requirements of the CVSP would ensure that future development on site does not adversely affect the visual quality of the area.

Additionally, the OMCPU includes policies requiring that future development projects include focal points and view corridors that afford views to Spring Canyon. As required by the CVSP, the Project proposes a park in the southern portion of the Project site that would provide a view corridor to the Spring Canyon open space areas to the southwest. Additionally, the CVSP requires a public trail along the southern boundary of the Project site, which also would afford views of Spring Canyon. There are no components of the proposed Project that would adversely affect public views in the area, such as from existing informal trails located within open space areas located off-site.

The Project accommodates views of Spring Canyon, and would not impact any off-site public viewing areas, vistas, or open spaces. Therefore, impacts to the visual quality of the area, with respect to views from public viewing areas, vista, and open spaces, would be less than significant. As such, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

OMCPU EIR

The OMCPU EIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The visual character of the Central District was described as transitioning from existing low-rise, single-use structures and blocks, to vertically and horizontally mixed-use structures and blocks. Under the OMCPU, the resulting building mass, scale, and heights were found to be those that are characteristic of medium-high density mixed-use and transit-focused development, with building heights ranging from three to four stories up to a maximum of six stories. The OMCPU EIR also found that mandatory compliance with applicable regulatory requirements that implement the goals and policies of the General Plan and OMCPU would ensure that impacts to the visual character and quality of the Central Village and surrounding areas would be less than significant. Furthermore, the OMCPU EIR concluded that the Central District is already developed with industrial and agricultural uses, and therefore the proposed intensification of uses within the Central District (including the Central Village) is not considered a significant change to the aesthetic character in the Central District and would be compatible with the surrounding development in terms of bulk, scale, materials, and style. Impacts were concluded to be less than significant, requiring no mitigation. (City of San Diego, 2014b, pp. 5.2-20 through 5.2-23)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, and consistent with conditions that existed at the time the OMCPU EIR was certified in 2014, the Project site consists of undeveloped parcels, parcels subject to dryland farming (oats), greenhouses, and a goat husbandry operation. Land uses surrounding the Project site include open space to the northwest, west, and southwest; light industrial uses and SR-905 to the north; light industrial (auto auctions), greenhouses, and agricultural uses to the east; and light and heavy industrial uses to the east and south. (Google Earth, 2018)

The Project does not propose any changes to the site's existing land use designations as applied to the site by the CVSP. The CVSP designates the Project site for "Neighborhood Village (15-44 du/ac)," "Residential – Medium (15-29 du/ac)," "Residential – Low Medium to Medium (10-29 du/ac)," "Population-Based Park," "Institutional," and "Open Space" land uses. Land uses proposed by the Project are fully consistent with the CVSP, and would allow for the future development of up to 1,868 dwelling units, 62,525 s.f. of commercial uses, 6.1 acres of recreational uses, and 6.3 acres for a school/recreation facilities site.

Regarding visual quality and character, the land uses proposed by the Project would be in accordance with the land uses envisioned by the OMCPU, as amended by the CVSP. Furthermore, the CVSP includes detailed architectural and landscaping policies and design standards that would help ensure that the Project area is developed in a manner that would not degrade the aesthetic character of the Project site or its surroundings in terms of bulk, scale, materials, or style. Refer to the CVSP Section 2.5, *Urban Design Element*, for more information. (T&B Planning, 2017)

In addition, future implementing development proposals within the Project area would be required to comply with applicable regulatory requirements that implement General Plan goals and policies. As part of the City's discretionary review process for implementing development projects within the Project area, the City will review each implementing development application for compliance with the General Plan as well as the policies contained in the OMCPU and CVSP. Specifically, General Plan Policy UD A.5 requires buildings to be designed to "contribute to a positive neighborhood character and relate to neighborhood and community context" (City of San Diego, 2014b, Table 5.2-1).

Furthermore, future implementing development proposals are required to comply with the CVSP, which includes policies and design standards addressing Urban Design, adherence to which would prevent future development projects from negatively affecting the visual quality of the area or strongly contrasting with the surrounding development and natural topography. Policies and design standards of the CVSP Urban Design Element address the CVSP's seven design principals, including: 1) Activity Nodes and Gateways; 2) Open Space Connections and View Corridors; 3) Gathering Spaces and Interior Courts; 4) Clear and Interconnected Circulation; 5) Parking Internal to Block; 6) Landscape Buffers as Screening; and 7) Positive Frontage and Connecting Land Use Interfaces (T&B Planning, 2017). The CVSP contains policies that would require future implementing projects to be compatible with the design theme envisioned for the Project area pursuant to Section 2.5, *Urban Design Element*, of the Specific Plan.

Thus, and consistent with the conclusion reached in the OMCPU EIR, future development anticipated in association with the proposed Project would not result in a severe contrast with the surrounding area's aesthetic character in terms of bulk, scale, materials and style, or natural topography, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project's land use changes be compatible with surrounding development in terms of bulk, scale, materials, or style? Would adverse aesthetic impacts result from the Project?

Would the Project result in a substantial change to natural topography or other ground surface relief feature?

OMCPU EIR

The OMCPU EIR found that the existing undeveloped parcels and scattered industrial, commercial, and rural residences along the SR-905 corridor (i.e., within the Central District) would transition over the next 30 years to a more urbanized, cohesive land use arrangement. The OMCPU EIR noted that specific grading quantities associated with future development were unknown; however, the OMCPU EIR determined that significant impacts due to substantial changes to natural landforms

and/or ground relief features would occur if one of the following conditions are met. The first condition is related to ESL Regulations and Steep Hillside Guidelines, while the remaining conditions include grading of manufactured slopes taller than 10 feet and fill slopes exceeding 5 feet in height. The OMCPU EIR also noted that per the City's Significant Determination Thresholds, grading impacts would not be considered significant if certain conditions applied. The OMCPU EIR found that all future development proposals in the OMCPU area would be reviewed to determine if the grading plans demonstrated compliance with the grading criteria in the OMCPU EIR, or if alternative design features would be required. Furthermore, the OMCPU EIR found that mandatory compliance with applicable regulatory requirements and OMCPU Policies would ensure that impacts associated with changes to natural topography would be less than significant and would require no mitigation. (City of San Diego, 2014b, pp. 5.2-24 through 5.2-25)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, the Project site is characterized by relatively level terrain ranging from 404 feet above mean sea level (amsl) in the southwestern portion of the Project site to 524 feet amsl on the northeastern portion of the Project site adjacent to Cactus Road. The Project would include grading of 92.4 acres of the 93.4-acre Project site, plus an additional 6.1 acres of grading off-site. The Project generally would maintain the site's existing topography, with development concentrated on the flatter portions of the site and natural slopes largely left undisturbed within planned open space areas. The Project would include fill slopes with a maximum height of 70 feet at a 2:1 slope ratio, and cut slopes with a maximum height of 10 feet at a 2:1 slope ratio. A total of 358,700 cubic yards (cy) of cut at 487,500 cy of fill is anticipated, with import of 128,800 cy of soil materials required. Due to the cut and fill slopes proposed by the Project, grading activities on the Project site would have the potential to result in a significant change to natural topography or other ground surface relief features. However, the Project would be subject to mandatory compliance with City of San Diego grading regulations, ESL Guidelines, and the Steep Hillside Guideline of the Land Development Code (LDC). Furthermore, in accordance with the OMCPU Policy 8.1-3, the Project would be required to minimize grading and relate proposed grades to the natural topographic features of the OMCPU area. Furthermore, slopes proposed as part of the Project were evaluated as part of a site-specific Geotechnical Report, which is contained as *Appendix F*. The Geotechnical Report evaluates the proposed grading plan, and incorporates measures to address slope stability. Future implementing development would be required to comply with the recommendations of the Geotechnical Report and/or any subsequent geotechnical investigations that may be required as part of future grading permit applications. Thus, and consistent with the conclusion reached in the OMCPU EIR, the proposed Project would not result in a substantial change to natural topography or other ground surface relief features, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that future development would be required to comply with the City's Grading Regulations, General Plan policies, and OMCPU policies. As such, the OMCPU EIR concluded that assuming compliance with these policies, impacts associated with the modification of unique physical features that would create a negative visual appearance would be less than significant. (City of San Diego, 2014b, pp. 5.2-25 through 5.2-26)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project site is located within and adjacent to steep hillside areas, which are considered ESL. Specifically, areas with steep slopes (i.e., gradients exceeding 25% and that exceed 50 feet in height) occur along the northern boundary of the site and in the southern portions of the site. There are no other unique physical features on the Project site.

OMCPU Policies 8.1-1 through 8.1-3 require new development to comply with ESL regulations, preserve a network of canyons and adjacent mesa tops, and minimize grading to relate to the area's natural topography (City of San Diego, 2014a, p. CE-9). The steep slopes in the northern portion of the Project site occur within the future ROW of Airway Road and the associated detention basin. It would not be feasible to construct Airway Road through the Project site without impacting the existing steep slopes because of the alignment of the existing portions of Airway Road east of Cactus Avenue. Thus, the existing slopes in the northern portions of the site would be contour graded as part of the Project to mimic, to the extent feasible, the natural topography while still allowing for appropriate engineering design.

The steep slopes in the southern portions of the site consist of finger-like extensions of Spring Canyon. These areas are targeted for residential and park development as part of both the OMCPU and CVSP. Furthermore, the finger canyon in the southern portion of the Project site is documented to contain impacted soils, including organochlorine pesticide (OCP) in the topsoil. Additionally, canyon fill and construction debris in this location has some indicators of petroleum hydrocarbons and lead. The fill and debris have been estimated as being approximately 25 to 30 feet deep. The debris would require removal and disposal as general refuse and the soil would need to be removed during grading. As such, it would not be possible to develop the proposed Project without impacting the contaminated steep slopes in the southern portions of the property. (CYA, 2017a, p. 42; CYA, 2017b, p. 8)

Due to the cut and fill slopes proposed by the Project, grading activities on the Project site would have the potential to result in a negative visual appearance due to the loss, covering, or modification of natural canyon or hillside slopes in excess of 25 percent gradient. However, slopes that would be impacted by the Project are limited to the southern boundary and in near the northwestern Project boundary. As indicated above, impacts to these existing steep slopes cannot be avoided. Additionally, these slopes are not prominently visible from off-site locations. Implementation of this portion of the CVSP would provide for view corridors and trails with views of the greater Spring Canyon complex. Additionally, grading proposed by the Project would be subject to mandatory

compliance with City of San Diego grading regulations, ESL Guidelines, and Steep Hillside Guideline of the Land Development Code. Project compliance with these regulations would be assured through the City's future review of implementing NDPs.

Therefore, and consistent with the conclusion reached in the OMCPU EIR, the proposed Project would not result in a negative visual appearance due to the loss, covering, or modification of any unique physical features including natural canyon or hillside slopes in excess of 25 percent gradient, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

AIR QUALITY/ODOR

Would the Project obstruct or conflict with the implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the SIP?

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU land use plan would result in fewer emissions than the adopted community plan upon which the current Regional Air Quality Strategy (RAQS) for the San Diego Air Basin (SDAB) was based. However, the OMCPU EIR concluded that while it is not anticipated that construction activities under the OMCPU would result in significant air quality impacts, impacts were concluded to be significant and unavoidable because air emissions from future implementing development projects within the OMCPU area could not be adequately quantified at the time the OMCPU EIR was prepared. For operational conditions, the OMCPU EIR found that the OMCPU would be consistent with adopted regional air quality improvement plans and would represent a decrease in emissions as compared to the assumptions used in the RAQS. However, operational air pollutant emission impacts were disclosed as significant and unavoidable because air pollutant emissions from future developments that would implement the OMCPU could not be adequately quantified by the OMCPU EIR at the policy level. Accordingly, due to the potential conflict with the RAQS and the State Implementation Plan (SIP) during construction and operational activities associated with OMCPU implementation, impacts were disclosed as significant and unavoidable. A statement of overriding considerations was adopted for these impacts. (City of San Diego, 2014b, pp. 6-8, 6-9, 11-5 and 11-6)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The San Diego Air Pollution Control District (SDAPCD) is the government agency that regulates sources of air pollution within San Diego County and developed a RAQS to provide control measures designed to achieve attainment status. The RAQS serves as the Air Quality Management Plan (AQMP) for the SDAB in which the Project site is located. As was the case when the OMCPU EIR was certified in 2014, the SDAB is in "non-attainment" status for federal and State ozone (O_3) standards and the State PM_{10} and $PM_{2.5}$ standards; however, an attainment plan is only available for O_3. The RAQS was adopted in 1992 and has been updated as recently as 2016 which was the latest update incorporating minor changes to the prior 2009 update. The 2016 RAQS update mostly clarified and enhanced emission reductions by updating the assessment of air quality improvement, updating recent and projected future emissions reduction

rates, incorporating control measures adopted/control measures scheduled for review, updating incentive programs, updating transportation control measures, and reaffirmation of state emissions offset repeal. (SDAPCD, 2016, pp. EX-1, EX-2)

The RAQS is largely based on population predictions by the SANDAG. Projects that produce less growth than predicted by SANDAG would generally conform to the RAQS and projects that create more growth than projected by SANDAG may create a significant impact. Also, an individual project would be considered to have a cumulatively-considerable impact if the project results in emissions that exceed the screening thresholds after the implementation of all feasible mitigation measures.

The OMCPU EIR and subsequent Addendum No. 408329 to the OMCPU EIR Addendum No. 408329 determined that implementation of the OMCPU as modified by the CVSP, including the proposed Project, would result in emissions in excess of the significance threshold for criteria air pollutants and precursors for which the region is in non-attainment, and would not be consistent with the AQMP assumptions. The OMCPU EIR and Addendum No. 408329 determined that impacts would be significant and unavoidable due to a conflict with the AQMP. The proposed Project would result in the same number of peak hour trips assumed for the Project site by Addendum No. 408329 and would result in fewer peak hour trips as compared to the number of trips assumed for the Project site by the OMCPU EIR. Accordingly, the Project's impacts would be fully within the scope of impacts identified in the OMCPU EIR and Addendum No. 408329; therefore, impacts due to a conflict with the AQMP under the proposed Project would be consistent with the impacts identified in the OMCPU EIR and Addendum No. 408329, and the Project's significant and unavoidable impact would not increase beyond that disclosed by the OMCPU EIR. The OMCPU EIR identified mitigation measures to reduce air quality-related impacts, and several of these mitigation measures would apply to the proposed Project to reduce air quality emissions. The Project would contribute to, but would not increase the significant unavoidable impact disclosed by the OMCPU EIR due to a conflict with the AQMP; thus, the Project's impacts are within the scope of analysis of the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

OMCPU EIR

The OMCPU EIR found that emissions resulting from the implementation of the OMCPU would potentially exceed daily SDAPCD emissions thresholds and result in a cumulatively-considerable net increase of criteria pollutants during both construction and long-term operation of implementing development projects. Although the analysis of construction-level impacts demonstrated that impacts would be less than significant, the OMCPU EIR concluded that impacts would be cumulatively considerable and unavoidable due to the possibility that multiple projects could be under construction simultaneously and could thereby cumulatively exceed the SDAPCD construction-related thresholds. Under long-term operating conditions, the OMCPU EIR determined that air quality emissions would be reduced under the OMCPU compared to the previously adopted community plan but also concluded that emissions under the OMCPU still would exceed the SDAPCD operational thresholds. Because air emissions from future developments within the OMCPU area could not be adequately quantified at the time the OMCPU EIR was certified due to the

fact that the OMCPU is a policy document and no specific development was proposed, this impact was disclosed as significant and unavoidable. The OMCPU EIR identified Mitigation Frameworks AQ-1 and AQ-2, which require the incorporation of best available control measures and reasonable mitigation to reduce emission levels. The OMCPU EIR concluded that even with implementation of Mitigation Frameworks AQ-1 and AQ-2, impacts due to potential violation of air quality standards and cumulatively-considerable net increase of criteria pollutants for which the region is in non-attainment would be significant and unavoidable. A statement of overriding considerations was adopted for these impacts. (City of San Diego, 2014b, pp. 5.3-22 and 5.3-23)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The SDAPCD has developed localized significance thresholds for regulated pollutants. Any projects in the SDAPCD with daily emissions that exceed any of the indicated thresholds would be considered as having an individually and cumulatively-considerable significant air quality impact. Air quality emissions would occur during both construction and operation of the proposed Project. The Project's potential to exceed the SDAPCD regional and/or localized emissions thresholds and potential to result in a cumulatively-considerable net increase in criteria pollutants for which the region is in non-attainment during both Project construction and long-term operation are discussed below.

Construction Impacts

Air quality emissions would result from construction activities needed to implement the proposed Project. Because the development area (93.4 acres) assumed by the OMCPU EIR and Addendum and development area (93.4 acres) proposed by the Project are substantially similar, it is assumed that construction activities associated with buildout of the Project would be consistent with the assumptions made in the OMCPU EIR and Addendum No.1 for the Project site.

The OMCPU EIR and Addendum No. 408329 determined that construction activities associated with individual implementing developments within the OMCPU area likely would be below the SDAPCD's regional significance thresholds. However, the OMCPU determined that if multiple implementing developments were to be under construction simultaneously, then short-term emissions of air pollutants and ozone precursors would have the potential exceed SDAPCD's regional significance thresholds, thereby resulting in a significant impact. Consistent with the finding of the OMCPU EIR, the Project's construction-related emissions likely would be below the SDAPCD's regional significance thresholds; however, there is a potential for Project construction activities to occur at the same time as other implementing developments within the OMCPU area. As such, Project construction activities would contribute to the significant and unavoidable impacts associated with construction-related emissions as identified in the OMCPU EIR and Addendum No. 408329, and impacts would be potentially significant.

The OMCPU EIR identified regulations and mitigation measures to reduce air quality-related impacts, and the applicable regulations and mitigation measures from the OMCPU EIR would apply to the proposed Project to reduce the Project's construction-related air quality emissions. Nonetheless, and consistent with the finding of the OMCPU EIR and Addendum No. 408329, because it cannot be assured that Project construction activities would not overlap with construction activities associated with other implementing developments, Project construction activities would contribute to the

significant and unavoidable impacts identified by the OMCPU EIR due to a violation of an air quality standard and due to a cumulatively-considerable net increase in criteria pollutants, even after the implementation of the mitigation measures identified by the OMCPU EIR. However, the Project's impacts would be fully within the scope of the impacts identified in OMCPU EIR and Addendum No. 408329. Furthermore, due to emissions regulations becoming more stringent and typical turnover of older pieces of construction equipment (older pieces of equipment being replaced with newer and less polluting pieces of equipment over time), Project construction air quality emissions may be reduced in comparison to what was evaluated and disclosed by the OMCPU EIR. Therefore, Project's impacts would be fully within the scope of impacts identified in the OMCPU EIR, and the level of impact (significant and unavoidable impact) associated with OMCPU buildout, including the Project, would not increase beyond what was cited in the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Operational Emissions

Air emissions from daily operations would include sources such as Area, Energy, and Mobile. Area Source emissions include emissions from consumer products, landscaping maintenance equipment, and architectural coatings (such as painting) as part of regular maintenance activities in a predominately residential community. Energy sources emissions would be generated from the production and consumption of energy to operate the community, such as electricity and natural gas. Mobile (or transportation-related) source emissions would occur from motor vehicles (tailpipe emissions) generated by land uses in the Project area.

The Project would be developed in accordance with the CVSP's policies and design standards, and consistent with the CVSP would be developed with fewer residential units and slightly more commercial area as compared to what was evaluated by the OMCPU EIR for the Project site. Thus, Area Source and Energy Source emissions would be similar to what was evaluated in the OMCPU EIR. Additionally, due to the reduction in the number of dwelling units, the Project would generate less traffic as compared to what was assumed for the Project site by the OMCPU EIR. Thus, Mobile Source emissions associated with the Project would be less than was disclosed by the OMCPU EIR.

The OMCPU EIR determined that buildout of the OMCPU, including the proposed Project, would result in emissions that exceed SDAPCD's regional significance thresholds for ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$. Due to the reduction in the amount of traffic that would be generated by the Project as compared to what was assumed by the OMCPU for the site, the Project would result in fewer emissions of these pollutants. Nonetheless, and consistent with the findings of the OMCPU EIR and Addendum No. 408329, the Project would contribute to the significant and unavoidable air quality impact and Project impacts would be significant. The OMCPU EIR identified regulations and mitigation measures to reduce air quality-related impacts and applicable regulations, and mitigation measures from the OMCPU EIR would apply to the proposed Project. Notwithstanding, and consistent with the finding of the OMCPU EIR and Addendum No. 408329, impacts due to a violation of an air quality standard and impacts due to a cumulatively-considerable net increase in criteria pollutants as a result of OMCPU buildout (including the Project) would remain significant and unavoidable even after the implementation of mitigation measures. The Project's impacts would be fully within the scope of impacts identified in the OMCPU EIR, and the level of impact (significant and unavoidable impact) would not increase with the implementation of the Project beyond that cited in

the OMCPU EIR and subsequent Addendum. Therefore, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the Project expose sensitive receptors to substantial pollutant concentration, including air toxics such as diesel particulates?

OMCPU EIR

The OMCPU EIR found that there were three intersections with a potential for Carbon Monoxide (CO) "Hot Spots": Otay Mesa Road at Innovative Way; Old Otay Mesa Road at Beyer Road; and Otay Valley Road and Heritage Road. The analysis concluded that the CO concentrations at these intersections would not exceed the ambient air quality standards. Therefore, the OMCPU EIR concluded that implementation of the OMCPU would result in less-than-significant impacts with respect to CO hot spots. (City of San Diego, 2014b, pp. 5.3-24 and 5.3-25)

With respect to diesel particulate matter (DPM), the OMCPU EIR found that acute health risks due to DPM would be less than significant. For long-term carcinogenic risks associated with DPM, the Maximally Exposed Individual Resident (MEIR) average residential incremental cancer risk due to diesel particulates from mobile sources was found to be 2.8 in one million; the 80th percentile residential incremental risk was calculated at 3.1 in one million; and the high-end residential incremental risk was determined to be 4.0 in one million. At the Point of Maximum Impact (PMI) for the Maximally Exposed Individual Worker (MEIW), the worker incremental cancer risk due to diesel particulates was calculated at 0.57 in one million. This is below the ten in one million threshold commonly applied by agencies in California. For non-carcinogenic risks, the OMCPU EIR found that the maximum chronic hazard index at any of the modeled receivers is 0.19, which is below the significance threshold of 1.0. As such, the OMCPU EIR found that DPM impacts affecting sensitive receptors would be less than significant. (City of San Diego, 2014b, pp. 5.3-25 and 5.3-26)

The OMCPU EIR also evaluated potential impacts to sensitive receptors from stationary sources. The EIR found that the OMCPU would allow for the establishment of new businesses that have the potential to emit toxic air contaminants (TACs), and imposed a mitigation measure (OMCPU EIR Mitigation Framework AQ-3) to require compliance with Assembly Bill (AB) 2588 prior to the establishment any new source of TACs within the OMCPU area. Nonetheless, the OMCPU EIR concluded that these impacts would be significant and unavoidable. (City of San Diego, 2014b, pp. 5.3-26 and 5.3-29)

Potential impacts due to collocation also were evaluated in the OMCPU EIR because the OMCPU would allow residential, commercial, and industrial uses in close proximity to one another. Air quality impacts discussed in the OMCPU EIR include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The OMCPU EIR noted that the OMCPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. While compliance with the OMCPU and General Plan policies, along with local, state, and federal regulations were found to reduce potential impacts, the OMCPU EIR concluded that future projects may result in significant impacts due to the introduction of sensitive uses (residential uses, schools, parks) within the buffer distances of the facilities. Although Mitigation Framework AQ-4 would be implemented with future developments in the OMCPU, collocation impacts were identified as

significant and unavoidable because it could not be determined in the absence of a detailed evaluation of future implementing development projects whether the proposed mitigation would reduce all impacts to below a level of significance. (City of San Diego, 2014b, pp. 5.3-29, 5.3-31, and 5.3-32) A statement of overriding considerations was adopted for this impact.

LUMINA PROJECT

No Substantial Change from Previous Analysis. Provided below is a discussion of potential impacts associated with CO "Hot Spots," DPM-related health risks, and TAC risks associated with the collocation of residential and industrial uses.

CO "Hot Spots"

Traffic that would be generated by the proposed Project would be less than was assumed for the site by the OMCPU EIR. As such, the Project would not increase the potential for CO "Hot Spots" within the OMCPU area. Because the OMCPU EIR determined that buildout of the OMCPU would not result in any CO "Hot Spots," and because the Project would generate less traffic than was accounted for by the OMCPU EIR, Project impacts due to CO "Hot Spots" would be less than significant and would be reduced in comparison to what was assumed by the OMCPU EIR.

DPM-Related Health Risks

In accordance with OMCPU EIR Mitigation Framework AQ-4, a site-specific health risk assessment (HRA) was conducted as part of the Air Quality Assessment prepared for Addendum No. 408329 to evaluate potential health risks to future Project residents associated with DPM emissions. Based on the modeling results that show impacts from vehicle exhaust along heavily traveled roadways, the HRA found that portions of the Project area north of Airway Road would be exposed to carcinogenic risks from DPM that could exceed 10 in one million for 70-year exposure durations (assuming a person stayed in this location for 70 years, 365 days per year, 24 hours per day, which represents a conservative standard). The proposed Project would not attract substantial numbers of heavy diesel trucks and therefore would not contribute to an increase in health risks in the OMCPU area beyond what was disclosed in the OMCPU EIR.

The Project would be required to comply with the Design Standards contained in the CVSP, which would be assured as part of the City's future review of the required NDP. CVSP Design Standard 2.2-11 requires installation of mechanical quality filtration systems for residential units in Planning Areas 5, 8, and 9 (i.e., the northern and southern portions of the Project site). Furthermore, CVSP Policy 2.5-54 requires residential units located north of Airway Road be designed to minimize building openings and usable outdoor spaces (balconies, patios, etc.) from having a direct line-of-sight with SR-905. Consistent with the findings of Addendum No. 408329, mandatory compliance with CVSP Design Standard 2.2-11 and Policy 2.5-54 would reduce to below a level of significance potential DPM impacts affecting future Project residents. (T&B Planning, 2017)

Toxic Air Contaminants and Collocation

As disclosed in the HRA prepared for Addendum No. 408329, the southern half of the Project site would be located in close proximity to off-site light and heavy industrial uses to the south and

southeast. As concluded by the OMCPU EIR and Addendum No. 408329, the collocation of residential and industrial uses would have the potential to result in air pollution-related health effects to sensitive receptors. The OMCPU EIR concluded that the potential exposure of sensitive receptors to air toxics would be significant and unavoidable. The Project would have no effect on the location, composition, or operational characteristics of existing or future off-site industrial uses, and the residential uses proposed by the Project are consistent with those identified in the OMCPU and CVSP. Furthermore, and as noted above, the Project would be subject to CVSP Design Standard 2.5-54, requiring the installation of mechanical air filtration systems for all residential units within CVSP Planning Areas 5 and 8 that are within 500 feet of the eastern and southern boundaries of the CVSP. Additionally, CVSP Policy 2.5-44 would apply, which includes design strategies to address issues associated with the collocation of industrial and residential uses, such as minimizing the number of doors and windows facing industrial uses (T&B Planning, 2017). Moreover, it should be noted that all off-site sources which have the ability to generate toxic air contaminants from operations are required to work with the SDAPCD and report emissions and obtain permits to operate. These requirements are independent of the proposed Project. Therefore, impacts caused by existing and future off-site industrial activities or operations would be less than significant.

Conclusion

Based on the preceding analysis, and assuming compliance with the policies and design standards of the CVSP, the Project would not expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the Project create objectionable odors affecting a substantial number of people?

OMCPU EIR

The OMCPU EIR found that at the time the OMCPU EIR was certified, there were no known significant odor generators within or near the Central Village. The OMCPU EIR found that none of the proposed OMCPU land uses are typically associated with the creation of objectionable odors. Therefore, the OMCPU EIR concluded that impacts associated with odors would be less than significant. (City of San Diego, 2014b, p. 5.3-33)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, no known significant odor generators are located within or near the Project site. Odor impacts would not significantly change under the proposed Project, and the development area and land uses would be in accordance with the CVSP, which were similar to the uses assumed by the OMCPU EIR for the site. The land uses proposed on the Project site do not include any substantial odor generating uses.

Consistent with the conclusion reached in the OMCPU EIR, the Project would produce odors during proposed construction activities, including odors from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, standard construction practices would minimize the odor emissions and their associated impacts. Any odors emitted

during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700, which prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health or safety of the public, including odors. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction.

The land uses proposed by the proposed Project would include residential, commercial, school, and recreational land uses, which are not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project's long-term operational use could be a potential source of odor. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, thereby precluding any significant odor impact. Also, future development projects that implement the proposed Project would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700. SDAPCD Rule 51 and Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people and the Project would have a less-than-significant impact.

Based on the above analysis and consistent with the conclusion reached in the OMCPU EIR, buildout of the Project would result in less-than-significant impacts due to odors. Therefore, the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

BIOLOGICAL RESOURCES

Would the Project result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU would have the potential to directly impact sensitive plants and animals through the loss of habitat or indirectly by locating development adjacent to the MHPA. Affected sensitive 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. As such, the OMCPU EIR found that these potential impacts to protected species of plants or animals would be significant. The OMCPU EIR identified Mitigation Framework BIO-1 to reduce significant impacts to below a level of significance. Mitigation Framework BIO-1 requires the preparation of site-specific biological resources surveys before implementing development projects are approved in accordance with the City of San Diego Biology Guidelines and mitigation for impacts to sensitive upland habitats to occur in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines (City of San Diego, 2012). In addition, the OMCPU EIR found that potentially significant construction-related noise impacts to sensitive animals would be reduced with

implementation of Mitigation Frameworks LU-2 and BIO-2. The OMCPU EIR concluded that with implementation of Mitigation Frameworks BIO-1, BIO-2, and LU-2, potentially significant impacts to sensitive plant and animal species would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-43 through 5.4-61)

LUMINA PROJECT

No Substantial Change from Previous Analysis. According the to the Biological Technical Report (BTR) prepared for the Project (*Appendix B*), the proposed Project would have the potential to impact sensitive species. The Project's impacts to sensitive species are detailed below.

Impacts to Special-Status Plants

The OMCPU EIR concluded that implementation of the OMCPU land use plan would have the potential to directly impact sensitive plants. The OMCPU EIR assumed potential impacts to 23 different sensitive plant species, of which mapping indicated the potential presence of San Diego barrel cactus and San Diego County sunflower in the Project area.

As stated in the OMCPU EIR, however, "due to the fact that portions of the biological resource assessment [used for the OMCPU EIR] are based on secondary source information rather than site-specific field surveys, the impacts [disclosed in the OMCPU EIR] would be refined for individual projects." As anticipated by this statement in the OMCPU EIR, and based on more recent field survey work, six sensitive plant species were found on the Project site during field surveys. Potential impacts to each are discussed below (Alden, 2019, p. 15):

- **South coast saltscale.** South coast saltscale occurs outside of the Project's on-site and off-site boundaries. Three individual plants were observed in the area mapped outside the off-site Airway Road impact area. Thus, the three individuals found in the mapped area along Airway Road off-site would not be impacted. (Alden, 2019, pp. 16, 44)

- **San Diego barrel cactus.** Six San Diego barrel cacti were observed on-site within the MHPA and 130 San Diego barrel cacti were observed on-site outside of the MHPA. The Project would directly impact 84 San Diego barrel cacti, with 79 of these individuals located in the MHPA. This species is an MSCP Covered Species considered to be adequately protected in the MHPA. Therefore, the impact is considered to be less than significant with Project compliance with the Land Use Adjacency Guidelines and Conditions and Area Specific Management Directives for MSCP Covered Species and no mitigation would be required. Although impacts would be less than significant, impacted individuals of this species would be salvaged and transplanted as part of the coastal sage scrub restoration on the Project's proposed habitat mitigation parcels. (Alden, 2019, pp. 16, 43)

- **San Diego bursage.** Four San Diego bursage plants were observed on-site outside of the MHPA area. All four San Diego bursage plants would be impacted with implementation of the Project. Impacts to four individuals are considered to be less than significant due to the low number of individuals to be impacted. (Alden, 2019, pp. 16, 44)

- **San Diego County sunflower.** A total of 67 San Diego County sunflower plants were observed on-site within the MHPA and an additional 18 plants were observed outside of the MHPA on-site. With implementation of the Project 39 San Diego sunflower plants would be impacted in the MHPA and 18 would be impacted outside the MHPA. Due to this species' low CNPS Rare Plant Rank of 4.2, Project-related impacts are considered to be less than significant. (Alden, 2019, pp. 16, 44)

- **Seaside calandrinia.** One seaside calandrinia plant was identified on-site in the MHPA. The one identified plant would be impacted with implementation of the Project. Due to this species' low CNPS Rare Plant Rank of 4.2, impacts to one individual are considered to be less than significant. (Alden, 2019, pp. 16, 44)

- **Small-flowered morning glory.** Eight small-flowered morning glory plants were identified on-site outside of the MHPA. All eight small-flowered morning glory plants would be impacted with implementation of the Project. Due to the species' low CNPS Rare Plant Rank of 4.2, the impacts to eight individuals are considered to be less than significant. (Alden, 2019, pp. 16, 44)

Impacts to Special-Status Animals

The OMCPU EIR concluded that implementation of the OMCPU land use plan would have the potential to directly impact sensitive animals. The OMCPU EIR assumed potential impacts to 23 different sensitive animal species. As stated in the OMCPU EIR, however, "due to the fact that portions of the biological resource assessment [used for the OMCPU EIR] are based on secondary source information rather than site specific field surveys, the impacts [disclosed in the OMCPU EIR] would be refined for individual projects." As anticipated by this statement in the OMCPU EIR, and based on more recent field survey work, six sensitive animal species were found on the Project site during field surveys. Potential impacts to each are discussed below (Alden, 2019, p. 23):

- **Orange-throated whiptail.** The orange-throated whiptail was observed or detected during previous site surveys in 2015/2016. The Project would impact scrub habitats and disturbed land that provide potential habitat for the orange-throated whiptail, which is an MSCP Covered Species. The loss of habitat for this species along with the potential loss of individuals would be significant and mitigation would be required. Implementation of Mitigation Measure MM-10 (refer to Section VI. of this EIR Addendum), requiring mitigation in the form of on- and off-site preservation of sensitive habitats, would reduce impacts to below a level of significance. (Alden, 2019, pp. 24, 44)

- **California horned lark.** The California horned lark was observed or detected during previous site surveys in 2015/2016. The Project would impact more than 65 acres of non-native grassland and agriculture that provide potential habitat for the California horned lark, which is on the State Watch List. It is not an MSCP Covered Species. Due to the amount of habitat loss for this species, impacts would be significant and mitigation would be required. Implementation of Mitigation Measure MM-10 (refer to Section VI. of this EIR Addendum), requiring mitigation in the form of on- and off-site preservation of sensitive habitats, would reduce impacts to below a level of significance. (Alden, 2019, pp. 24, 45)

- **Cooper's Hawk.** The Cooper's hawk was observed or detected during previous site surveys in 2015/2016 and in 2018. The Project would result in the loss of habitat on-site including Diegan coastal sage scrub, that may support the primary avian prey of the Cooper's hawk. The Project would also result in a loss of raptor foraging habitat that could be used by the Cooper's hawk. The loss of raptor foraging habitat would be significant and mitigation would be required. Implementation of Mitigation Measure MM-14 (refer to Section VI. of this EIR Addendum), which specifies construction buffers for active northern harrier and/or BUOW nests during construction, would reduce impacts to below a level of significance. (Alden, 2019, pp. 24, 45)

- **Sharp-shinned Hawk.** The sharp-shinned hawk was observed flying overhead in 2018. The Project would result in a loss of raptor foraging habitat that could be used by the sharp-shinned hawk. The loss of raptor foraging habitat would be significant and mitigation would be required. Implementation of Mitigation Measure MM-14 (refer to Section VI. of this EIR Addendum), which specifies construction buffers for active northern harrier and/or BUOW nests during construction, would reduce impacts to below a level of significance. (Alden, 2019, pp. 24, 45)

- **Northern harrier.** The northern harrier was observed or detected during previous site surveys in 2015/2016. The northern harrier has potential to nest on-site, and it nests on the ground. Therefore, Project construction would have the potential to directly impact northern harrier nesting. Furthermore, loss of non-native grassland due to implementation of the Project would result in a loss of raptor foraging habitat (Tier III B non-native grassland) that could be used by the sensitive northern harrier (State Species of Special Concern and MSCP Covered Species). The loss of raptor foraging habitat would be significant. Implementation of Mitigation Measure MM-10 (refer to Section VI. of this EIR Addendum), requiring mitigation in the form of on- and off-site preservation of sensitive habitats, would reduce impacts to below a level of significance. Furthermore, the Project would be subject to mandatory compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Wildlife Code, which would reduce impacts to northern harrier to less than significant. (Alden, 2019, pp. 24, 45)

- **Coastal California gnatcatcher.** The coastal California gnatcatcher (CAGN) was observed in the MHPA on-site. All Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed habitat in the MHPA on-site is considered occupied by the CAGN. The Project would directly impact 1.5 acres of Diegan coastal sage scrub and Diegan coastal sage scrub-disturbed habitat on-site in the MHPA which is considered occupied by the CAGN. The CAGN is federal listed endangered, a State Species of Special Concern, and is an MSCP Covered Species. Impacts to the CAGN would occur due to habitat removal in the MHPA, which would be significant and mitigation would be required. Implementation of Mitigation Measure MM-10 (refer to Section VI. of this EIR Addendum), requiring mitigation in the form of on- and off-site preservation of sensitive habitats, would reduce impacts to below a level of significance. Direct impacts to the CAGN and its habitat outside the MHPA are authorized under the City's Subarea Plan and are considered less than significant. (Alden, 2019, pp. 24, 45)

Impacts to Non-Listed Species

In addition to the listed plant species discussed above, the proposed Project would have the potential to impact sensitive and MSCP Narrow Endemic plant species. A full list of the sensitive plant species and their potential to occur are listed in Table 3 of the BTR (*Appendix B*). All of the listed plant species are either not expected, or have very low to low potential to occur based on the location of the site, the habitats present, and/or because they have not been found on-site during surveys conducted. Therefore, impacts to these plant species are not anticipated, and no mitigation would be required. (Alden, 2019, pp. 17-22, 45)

In addition to the listed animal species discussed above, the proposed Project would have the potential to impact habitat for the following non-listed, special-status animal species that have potential to occur: 1) Invertebrates: Quino checkerspot butterfly; 2) Reptiles: coast horned lizard, red-diamond rattlesnake; 2) Birds: coastal cactus wren, burrowing owl (BUOW), grasshopper sparrow, loggerhead shrike, Southern California rufous-crowned sparrow; and 2) Mammals: northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and San Diego desert woodrat. (Alden, 2019, pp. 22-27)

Conditions for Coverage under the MSCP for the BUOW require that during the environmental analysis of proposed projects, BUOW surveys (using appropriate protocols) be conducted in suitable habitat to determine if this species is present and the location of active burrows. Site-specific BUOW surveys were conducted on site in 2014, 2015, 2016, and 2018, and neither the BUOW, burrows, nor its sign was found. While a BUOW survey was not conducted on-site in 2017, surveys were conducted for three consecutive years immediately prior to 2017, and a fourth survey was conducted in 2018 during which any BUOW signs from 2017 would likely have been visible if present. According to the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game 2012), occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl, or its sign at or near a burrow entrance, is observed within the last three years. Therefore, the BUOW is considered absent from the Project site. However, because the site contains suitable habitat for the BUOW, in accordance with Mitigation Measure MM-12 (refer to Section VI. of this EIR Addendum), a pre-construction survey and impact avoidance should the BUOW be found in accordance with the Conditions for Coverage for the species is required by the City of San Diego to avoid harming BUOWs if any were to be present immediately prior to construction. Furthermore, implementation of Mitigation Measures MM-13 and MM-14, which require best management practices for the BUOW and specify avoidance buffers for active BUOW and/or northern harrier nests, would reduce impacts to below a level of significance. (Alden, 2019, p. 38)

Proposed impacts to Quino checkerspot butterfly, coastal cactus wren, grasshopper sparrow, northwestern San Diego pocket mouse, and San Diego desert woodrat would be less than significant under CEQA based on the low likelihood of observing the species on-site. Direct impacts to individuals or the habitats of coast horned lizard, red-diamond rattlesnake, southern California rufous-crowned sparrow, loggerhead shrike, and San Diego black-tailed jackrabbit, should these species be present, would be significant and mitigation would be required. Implementation of Mitigation Measure MM-10 (refer to Section VI. of this EIR Addendum) would reduce direct impacts to the above-listed species to below a level of significance through on- and off-site preservation of sensitive habitats. Furthermore, implementation of MM-15, requiring measures to prevent

Argentine ants in container stock, would reduce indirect impacts to the coast horned lizard to below a level of significance. (Alden, 2019, pp. 22-27, 46)

Impacts to Raptors

The Project would remove 2.9 acres of non-native grassland which is potential foraging habitat for raptors, including the northern harrier. The loss of other habitats on-site that may support the primary avian prey of the sensitive Cooper's hawk, such as Diegan coastal sage scrub, would also result in a loss of potential raptor foraging habitat. The loss of raptor foraging habitat would be significant and mitigation would be required. Implementation of Mitigation Measures MM-10 and MM-14 (refer to Section VI. of this EIR Addendum), requiring on- and off-site preservation for sensitive habitats and construction buffers for active northern harrier and/or BUOW nests during construction, would reduce impacts to below a level of significance. (Alden, 2019, p. 45)

Impacts to Critical Habitat

The proposed Project does not contain any lands designated as critical habitat by the United States Fish and Wildlife Service (USFWS); thus, the proposed Project would not impact critical habitat. (Alden, 2019, p. 6)

Impacts to Nesting Birds

The Project has the potential to indirectly impact active bird nests if vegetation is removed during the nesting season (generally February 1 to September 15). Impacts to nesting birds are prohibited by the MBTA and California Fish and Game Code. However, in accordance with OMCPU EIR Mitigation Framework BIO-2, the Project's BTR includes Mitigation Measures MM-5, MM-12, and MM-14 (refer to Section VI. of this EIR Addendum) that would require pre-construction surveys and avoidance (as necessary) of active nests during the breeding season in order to reduce impacts to less-than-significant levels. Consistent with the findings of OMCPU EIR, impacts to nesting birds protected by the MBTA would be reduced to less-than-significant levels with implementation of the site-specific recommendations in the Project's BTR (*Appendix B*). (Alden, 2019)

Conclusion

The Project's impacts to sensitive species as discussed above would be consistent with the findings of the OMPCU EIR and Addendum No. 408329 thereto. Impacts to biological resources that would occur as a result of the proposed Project were disclosed in the OMCPU EIR, and mitigated to less than significant levels. OMCPU EIR Mitigation Frameworks BIO-1 and BIO-2 require preparation of a site-specific biological resources and implementation of appropriate mitigation to be conducted. In accordance with OMCPU EIR Mitigation Frameworks BIO-1, and BIO-2, the Project's BTR (*Appendix B*) includes Mitigation Measures MM-1 through MM-15 (refer to Section VI. of this EIR Addendum) to mitigate the above-listed site-specific impacts to sensitive species. With implementation of the recommendation included in the BTR, impacts to sensitive species would be reduced to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species?

OMCPU EIR

The OMCPU EIR found that future development associated with the implementation of the OMCPU, including the construction of roadways and utility lines within the MHPA, would have the potential to interfere with the nesting, foraging, and movement of migratory wildlife, which would result in a significant impact. The OMCPU EIR identified Mitigation Framework BIO-2, which requires identification of site-specific mitigation for future development projects in accordance with the City's Biology Guidelines during the discretionary review process. The OMCPU EIR concluded that with compliance to applicable OMCPU policies and development standards and regulations including the City's ESL Ordinance and MSCP and with implementation of Mitigation Framework BIO-2, impacts to migratory wildlife would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-62 and 5.4-63)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project is located in an area that supports the movement of migratory wildlife. As noted by the OMCPU EIR, and as previously shown in Figure 7, Spring Canyon, which is in the MHPA, occurs to the north and west of the Project site and within the Project site along its northern border and supports the movement of migratory wildlife through Otay Mesa. The Project would maintain the on-site MHPA-designated areas as open space, with the exception of an area where the City of San Diego General Plan and OMCPU call for Airway Road to traverse the MHPA. Additionally, although Airway Road would traverse a portion of the City's MHPA, Airway Road is a Mobility Element-designated facility and was planned to traverse MHPA areas by the OMCPU. Pursuant to the MSCP, Community Plan Mobility Element facilities are allowed to traverse MHPA areas (City of San Diego, 1997, p. 44). Furthermore, access to Planning Area 9 (and the Airway Road detention basin) from Airway Road is necessary to be from the signalized intersection with Village Way, which results in the private drive on site passing through the MHPA. The private drive is necessary to provide adequate access to the site, including emergency access, and is necessary to be from the signalized intersection with Village Way in order to accommodate the City's Street Design Manual minimum intersection spacing requirements between signalized intersections along Primary Arterial roadways. Additionally, the City's Street Design Manual states that intersections of local roadways (i.e., the private drive) and major streets (i.e., Airway Road) should be kept to a minimum. Thus, the private drive is necessary to be from the signalized intersection with Village Way instead of elsewhere in the area to minimize the number of intersections of local roadways and major streets along Airway Road. The intersection location and storm drain facilities included as part of the Lumina Project are considered supporting features of the ultimate buildout of the OMCPU Circulation Element pursuant to the approved OMCPU and CVSP. Given the City's Street Design Manual requirements for intersection spacing from Cactus Road and minimization of intersections of local roadways and major streets, there is no other location option for the access road. Therefore, the private drive access to Planning Area 9 crossing the MHPA is the result of the City's Street Design Manual requirements and not the result of Lumina Tentative Map Project design. Furthermore, implementation of MM-5 (refer to Section VI. of this EIR Addendum), which requires avoidance of nesting birds during construction, would reduce impacts to raptors and migratory birds to less than significant. The impacts that would be caused by the

Project are within the scope of the OMCPU EIR, and all impacts due to interfering with the nesting/foraging /movement of any resident or migratory fish or wildlife species would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously disclosed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that the OMCPU would result in significant impacts to Tier I, II, IIIA, and IIIB habitats, which 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. The OMCPU EIR anticipated impacts to 211.6 acres of vegetation communities/land cover types within the CVSP area. The OMCPU EIR concluded that compliance with OMCPU policies and development regulations and standards and implementation of Mitigation Framework BIO-1, requiring site specific-biological resources studies to be conducted for implementing development projects in accordance with the City's Biology Guidelines and mitigation for impacts to sensitive upland habitats to be in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines, impacts would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-64 and 5.4-65)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The OMCPU EIR reported six vegetation communities/land cover types are located in the Project area in the OMCPU EIR. The Addendum No. 408329 to the OMCPU EIR for the CVSP project confirmed that each of these identified communities was still present in the on the Project site, although the extent of their current coverage is different that was disclosed in the OMCPU EIR. In addition, Addendum No. 408329 to the OMCPU EIR indicated that that one additional vegetation community was present on-site (i.e., non-native vegetation). The difference in vegetation communities reported between the OMCPU EIR and the Addendum No. 408329 to the OMCPU EIR was the result of more refined mapping done for the CVSP project and/or changes in the actual field conditions. The Project's vegetation mapping confirmed that each of the seven identified communities was still present on the Project site. Figure 7, *Vegetation Communities Impacts,* shows the results of the vegetation mapping included in the Project's site-specific BTR (*Appendix B*) as shown in Table 2, *Existing Vegetation Communities/Land Cover Types.*

Consistent with finding of the OMCPU EIR and Addendum No. 408329 to the OMCPU EIR, there is no riparian habitat located within the Project site. The proposed Project would result in impacts to 91.8 acres of habitat on-site and 8.8 acres of habitat off-site. Table 3, *Direct Impacts to Vegetation Communities/Land Cover Types,* shows the Project's impacts to vegetation communities/land cover types. Project-related impacts to Tier I maritime succulent scrub, Tier II Diegan coastal sage scrub, Diegan coastal sage scrub-disturbed, and Tier IIIB non-native grassland would be significant. Mitigation for these impacts would be required. Impacts to Tier IV non-native vegetation,

Table 2 Existing Vegetation Communities/Land Cover Types

Vegetation Community/ Land Cover Type	On Site		Off Site	Total
	Outside the MHPA	Inside the MHPA		
Upland Vegetation				
Maritime succulent scrub disturbed (Tier I)	0.5	--	--	0.5
Diegan coastal sage scrub (Tier II)	0.2	1.3	--	1.5
Diegan coastal sage scrub-disturbed (Tier II)	1.7	1.1	--	2.8
Non-native grassland (Tier IIIB)	2.6	1.1	--	3.7
Other Upland Vegetation				
Non-native vegetation (Tier IV)	0.3	--	--	0.3
Agriculture (Tier IV)	61.5	0.2	--	61.7
Disturbed land (Tier IV)	2.3	--	3.6	5.9
Land Cover				
Urban/Developed (NA)	20.6	--	5.2	25.8
TOTAL	**89.7**	**3.7**	**8.8**	**102.2**

[1]Upland vegetation communities and some other areas within the MSCP study area have been divided into tiers of sensitivity. Tier I = rare upland. Tier II = uncommon upland. Tier IIIB = common upland. Tier IV = other upland. Tier I communities are the most sensitive and Tier IV communities are the least sensitive based on rarity and ecological importance (City 2012). Tier level, in part, determines mitigation ratios (see Section 8.2.1, *Mitigation for Direct Impacts to Upland Vegetation Communities*, for more information.

(Alden, 2019, Table 2)

Table 3 Direct Impacts to Vegetation Communities/Land Cover Types

Vegetation Community/Land Cover Type	On Site					Off Site
	Total Existing Onsite	Impacts Inside the MHPA	Impacts Outside the MHPA	Total Impacts	Remaining[2]	Total Off-site Impacts[3]
Upland Vegetation						
Maritime succulent scrub-disturbed (Tier I)	0.5	--	0.5	0.5	--	--
Diegan coastal sage scrub (Tier II)	1.5	0.5	0.2	0.7	0.8	--
Diegan coastal sage scrub-disturbed (Tier II)	2.8	1.0	1.5	2.5	0.3	--
Non-native grassland (Tier IIIB)	3.7	0.5	2.4	2.9	0.8	--
Other Upland Vegetation						
Non-native vegetation (Tier IV)	0.3	--	0.3	0.3	--	--
Agriculture (Tier IV)	61.7	0.2	61.7	61.9	--	--
Disturbed land (Tier IV)	2.3	--	2.3	2.3	--	3.6
Land Cover						
Urban/Developed (NA)	20.6	--	20.6	20.7	--	5.2
TOTAL	**93.4**	**2.3**	**89.5**	**91.8**	**1.9**	**8.8**

[1]All brush management for the project would occur within the impact footprint. Brush management is not required for Airway Road. See Section 6.1.7, *Brush Management*, for more information.
[2]The project will place of a covenant of easement over the remaining habitat on site per ESL Regulations.
[3]All off-site impacts are outside the MHPA.

(Alden, 2019, Table 5)

agriculture, and disturbed land would be less than significant as the impacts would not meet criteria for significance and no mitigation would be required. In accordance with OMCPU EIR Mitigation Framework BIO-1, the Project's site-specific BTR (*Appendix B*) identifies Mitigation Measure MM-10, which is incorporated herein in Section VI. of this EIR Addendum and requires mitigation for impacts to sensitive habitats in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines. As shown on Table 4, *Mitigation for Significant Direct Impacts to Vegetation Communities*, with implementation of Mitigation Measure MM-10, the Project would adequately mitigate impacts to sensitive vegetation communities and impacts would be less than significant. (Alden, 2019, pp. 41-43, 51-53) Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact due to a conflict with sensitive habitats. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Table 4 Mitigation for Significant Direct Impacts to Vegetation Communities

Vegetation Community	Impacts[2] (Inside/Outside MHPA)	Mitigation Ratio[3]	Required Mitigation[4,5]	On-Site Preservation[6]	Off-site Preservation/ Restoration Barton Parcels	Off-site Preservation Sorenson Parcels	Total Mitigation
Maritime succulent scrub (Tier I)	--/0.5	1:1	0.5	--	--/--	0.5	0.5
Diegan coastal sage scrub (Tier II)[6]	1.5/1.7	1:1	3.2	1.1	0.2/0.9	1.0	3.2
Non-native grassland (Tier IIIB)	0.5/2.4	1:1 (inside MHPA) 0.5:1 (outside MHPA)	0.5 (inside MHPA) 1.2 (inside MHPA)	0.8	0.6/--	0.3	1.7
TOTAL	**2.0/4.6**	--	**5.4**	**1.9**	**1.7**	**1.8**	**5.4**

[1]Impacts and mitigation presented in acres and reflect rounding.
[2]Includes 1.2 acres of Airway Road impacts allowed within the MHPA and 0.8 acre of impact to be deleted from the MHPA through the MHPA BLA process pursuant to the MSCP Subarea Plan.
[3]All mitigation land would be in the MHPA, or added to the MHPA, and this is reflected in the mitigation ratios and required mitigation.
[4]The project will comply with City ESL regulations and place of a covenant of easement over non-impacted ESL areas of the site.
[5]If the BUOW is found to be present during the pre-construction/take avoidance survey (see Section 8.2.2, *Mitigation for Direct Impacts to Sensitive Animal Species*), the mitigation for non-native grassland must be through the conservation of occupied BUOW habitat or conservation of lands appropriate for restoration, management, and enhancement of BUOW nesting and foraging requirements.
[6]Includes Diegan coastal sage scrub-disturbed.

(Alden, 2019, Table 6)

Would the Project affect the long-term conservation of biological resources as described in the MSCP?

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU would be consistent with the MSCP, but acknowledged that the OMCPU would introduce land uses adjacent to the MHPA, which would result in a potentially-significant impact at the program-level. The OMCPU EIR found that future development in the OMCPU area may require adjustment(s) to the MHPA boundary; however,

potential impacts to the MHPA preserve configuration as a result of MHPA boundary adjustments were found to be less than significant because any such adjustment must meet the required MHPA boundary line equivalency criteria and would be subject to approval from the USFWS and California Department of Fish and Wildlife (CDFW). Additionally, the OMCPU EIR found that potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines. The OMCPU EIR found that although implementation of the OMCPU would introduce land uses adjacent to MHPA which would potentially result in a significant impact, compliance with established development standards and other applicable regulations of the City's Municipal Code as well as the MSCP Subarea Plan's Land Use Adjacency Guidelines, MSCP Management Policies and Directives, and Area Specific Management Directives were found to reduce impacts to below a level of significance. Additionally, impacts due to a conflict with the MHPA Land Use Adjacency Guidelines were determined to be less than significant with implementation of Mitigation Framework LU-2. (City of San Diego, 2014b, pp. 5.1-58 through 5.1-64)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Implementation of the proposed Project would result in development on-site that is substantially consistent with the OMCPU and CVSP. If a project would encroach into the MHPA beyond the allowable development area pursuant to Sections 143.0142 and 131.0250(b) of the Land Development Code and pages 13-15 of the City's Biology Guidelines, an MHPA boundary line adjustment is required. Under the City's MSCP Subarea Plan, an adjustment to the City's MHPA boundary is allowed only if the new MHPA boundary results in an exchange of lands that are functionally equivalent or higher in biological value. A determination of functionally equivalent or higher biological value is based on site-specific information (both quantitative and qualitative) that addresses six boundary adjustment criteria outlined in Section 5.4.3 of the Final MSCP Plan (City of San Diego, 1997). (Alden, 2019, p. 39)

The Project would maintain the on-site MHPA-designated areas as open space, with the exception of one area where the City of San Diego General Plan and OMCPU call for Airway Road to traverse the MHPA and one area related to TM Lot 1, which includes a private drive within Planning Area 9 from Airway Road.

The portions of the Project site located adjacent to the MHPA boundary would be subject to compliance with the MSCP in accordance with the OMCPU EIR's Mitigation Framework LU-2, which requires MHPA adjacency impacts to be addressed at the project-level. The Project includes a site-specific BTR (*Appendix B*), which found that the Project would be consistent with the City MSCP Subarea Plan and the MHPA. Additionally, although Airway Road would traverse a portion of the City's MHPA, (approximately 1.2 acres) Airway Road is a Mobility Element-designated facility and was planned to traverse MHPA areas by the OMCPU. Pursuant to the MSCP, Community Plan Mobility Element facilities are allowed to traverse MHPA areas (City of San Diego, 1997, p. 44).

Furthermore, access to Planning Area 9 (and the Airway Road detention basin) from Airway Road is necessary to be from the signalized intersection with Village Way, which results in the private drive on site passing through the MHPA. The private drive is necessary to provide adequate access to the site, including emergency access, and is necessary to be from the signalized intersection with Village Way in order to accommodate the City's Street Design Manual minimum intersection spacing requirements between signalized intersections along Primary Arterial roadways. Additionally, the

City's Street Design Manual states that intersections of local roadways (i.e., the private drive) and major streets (i.e., Airway Road) should be kept to a minimum. Thus, the private drive is necessary to be from the signalized intersection with Village Way instead of elsewhere in the area to minimize the number of intersections of local roadways and major streets along Airway Road. The intersection location and storm drain facilities included as part of the Lumina Project are considered supporting features of the ultimate buildout of the OMCPU Circulation Element pursuant to the approved OMCPU and CVSP. Given the City's Street Design Manual requirements for intersection spacing from Cactus Road and minimization of intersections of local roadways and major streets, there is no other location option for the access road. Therefore, the private drive access to Planning Area 9 crossing the MHPA is the result of the City's Street Design Manual requirements and not the result of Lumina Tentative Map Project design. The Project proposes to remove 0.8 acre from the MHPA as part of development of TM Lot 1, which includes the private drive. The Project also proposes to add 3.1 acres to the MHPA, which would result in a net gain to the MHPA of 2.3 acres and would reduce the mitigation ratios for Project-related impacts. Pursuant to the requirements of the MSCP Subarea Plan, a MHPABLA was required for removal of 0.8 acre of impact from the MHPA related to TM Lot 1. Additionally, as a result of the BLA and the Project's impacts to ESL, an SDP application was required for the Project. An equivalency analysis for the proposed MHPA removal and the addition of lands contiguous to the MHPA is provided in the BTR *(Technical Appendix B)* Section 8.2.1. (Alden, 2019, pp. 2, 34, 39)

The proposed Project would result in a total of 2.0 acres of impacts to sensitive habitat located inside the MHPA. This includes 1.2 acres of Airway Road impacts allowed within the MHPA and 0.8 acre of impact to be removed from the MHPA through the MHPA BLA process pursuant to the MSCP Subarea Plan. As noted above, the Wildlife Agencies provided concurrence on the Project's MHPA BLA on March 29, 2019.

An MSCP Subarea Plan and MHPA adjacency consistency analysis was conducted for the proposed Project. The consistency analysis focuses on potential MHPA adjacency impacts associated with the proposed Project and other MSCP Subarea Plan policies. Indirect effects listed in the City's Subarea Plan evaluated include those from drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development as addressed by the Land Use Adjacency Guidelines specifically for indirect impacts to the MHPA. A detailed analysis of the Project's compliance with the MSCP Subarea Plan is provided in BTR Subsection 6.0, *MSCP Consistency*. In accordance with OMCPU EIR Mitigation Framework LU-2, the Project's site-specific BTR (*Appendix B*) identifies Mitigation Measures MM-16 through MM-19 to reduce impacts due to conflicting with the provisions of the MSCP Subarea Plan to below a level of significance. Mitigation Measures MM-16 through MM-19 are incorporated herein in Section VI. of this EIR Addendum. Furthermore, the CVSP includes Design Standards and Policies that protect the MHPA and comply with the MHPA Land Use Adjacency Guidelines, and the Project would be required to comply with the CVSP, including the provisions that protect the MHPA. Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact due to a conflict with the provisions of the MSCP. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in the introduction of invasive species of plants into the area?

OMCPU EIR

The OMCPU EIR found that the OMCPU would have the potential to introduce invasive species into the MHPA due to the large extent of future grading and development anticipated within the OMCPU area. The OMCPU EIR concluded that assuming compliance with MHPA Land Use Adjacency Guidelines and implementation of mitigation framework LU-2, which requires the project's landscape plan to contain a mix of native species to be located adjacent to MHPA and prohibits the use of exotic plants and invasive species, impacts would be reduced to a level below significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project would be developed in accordance with the CVSP. The CVSP includes a "Village-Wide Plant Palette" and a mandatory Design Standard which prohibits the use of invasive plant species within the CVSP area (including the Project site). CVSP Design Standard 2.5-2 states "Prohibited and invasive plant species shall not be knowingly used within Central Village. Prohibited plants are those which do not satisfy the minimum performance standards for the site area per the City's Municipal Code Chapter 14, Article 2, Division 4, Landscape Regulations." (T&B Planning, 2017). Additionally, the landscape plans for the Project were reviewed by a qualified biologist to confirm that they do not include any invasive species, including in the detention basins on site. Furthermore, the Project would be developed in accordance with OMCPU EIR Mitigation Framework LU-2, which requires a project's landscape plan to contain a mix of native species to be located adjacent to the MHPA and prohibits the use of exotic plants and invasive species, and further requires the project biologist for each project to identify mitigation measures needed to reduce impacts below a level of significance. Thus, in accordance with Mitigation Framework LU-2, the Project's landscape plan contains a mix of native species in areas located adjacent to the MHPA and prohibits the use of exotic plants and invasive species.

However, during construction, invasive, non-native plants could be transported to the site on construction equipment or vehicles (e.g., seeds on undercarriages) and could colonize areas disturbed by construction activities, and those species could potentially spread into the MHPA.

The Project's BTR (*Appendix B*) identifies Mitigation Measure MM-19 to reduce impacts due to introduction of invasive species to less than significant. Mitigation Measure MM-19 is incorporated herein in Section VI. of this EIR Addendum. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that future development projects implemented in accordance with the OMCPU would result in significant impacts to federally-protected wetlands and other jurisdictional water resources, including riparian habitat; vernal pools and vernal pool species; and basins with sensitive species of fairy shrimp. The OMCPU EIR identified Mitigation Framework BIO-4 to reduce impacts, which requires compliance with federal wetland permitting requirements. Mitigation Framework BIO-4 also requires site-specific biological resources surveys to be conducted in association with implementing development projects in accordance with the City's Biology Guidelines, and mitigation for impacts to wetlands to be implemented in accordance with MSCP mitigation ratios specified in the City's Biology Guidelines. The OMCPU EIR concluded that compliance with OMCPU policies, established development standards, ESL Regulations, MSCP Subarea Plan, the City's Biology Guidelines, and implementation of Mitigation Framework BIO-4, impacts would reduce impacts to wetlands, vernal pools, and other jurisdictional water resources to a level below significance at the program level.. (City of San Diego, 2014b, pp. 4.5-69 and 5.4-70)

LUMINA PROJECT

No Substantial Change from Previous Analysis. A jurisdictional delineation for the Project site was conducted by Alden, the results of which are provided in Appendix E of the Project's BTR (*Appendix B*). The Project site contains non-wetland Waters of the U.S. and non-wetland Waters of the State which consist of three, non-wetland, ephemeral streambeds associated with the northwestern canyon in the MHPA on-site and the southwestern canyons on-site. These ephemeral streams cover a total of approximately 0.152 acre (1,999 linear feet). There are no wetland Waters of the U.S. and no wetland waters of the State on-site as none of the streambeds meet the hydrophytic vegetation criterion. There are no wetland or non-wetland Waters of the U.S. and no wetland or non-wetland Waters of the State located in the Project's off-site impact areas. (Alden, 2019, pp. 27-28)
The non-wetland Waters of the U.S./Waters of the State discussed above do not meet the City's Wetland definition. According to the City's Land Development Code Biology Guidelines, seasonal drainage patterns (i.e., ephemeral/intermittent drainages and streambeds) would not satisfy City's Wetland definition unless wetland dependent vegetation is either present in the drainage or lacking due to past human activities. The non-wetland waters on-site lack wetland vegetation and therefore, are not City Wetlands. (Alden, 2019, p. 28)

As shown in Figure 7, approximately 0.149 acre (1,881 linear feet) of ephemeral streams on-site that are non-wetland Waters of the U.S. and non-wetland Waters of the State would be impacted by the Project. There are no federal, State, or City Wetlands present on- or off-site that would be impacted with implementation of the Project. Nonetheless, the Project would have a substantial adverse effect on federal and state protected wetlands as defined by Section 404 of the Clean Water Act and Section 1602 of the California Fish and Game Code through direct removal, filling, hydrological interruption, or other means. In accordance with OMCPU EIR Mitigation Framework BIO-4, the Project would be required to obtain a Section 404 Permit from the U.S. Army Corps of Engineers,

Section 1602 Permit from CDFW, and Section 401 Permit from the RWQCB prior to commencing construction activities. With implementation of OMCPU EIR Mitigation Framework BIO-4, impacts related to wetlands would be reduced to less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously disclosed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the temporary construction noise from the Project or permanent noise generators (including roads) adversely impact sensitive species (e.g., coastal California gnatcatcher) within the MHPA?

OMCPU EIR

The OMCPU EIR found that the OMCPU would have the potential to result in significant temporary and/or noise impacts to sensitive species within the MHPA. The OMCPU EIR concluded that compliance with applicable policies of the City's General Plan and OMCPU, ESL Regulations, MHPA Land Use Adjacency Guidelines, and the City's Biology Guidelines, as well as implementation of mitigation frameworks BIO-1 through BIO 4 and LU-2, noise-related impacts to sensitive species within the MHPA would be reduced to below a level of significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. Buildout of the proposed Project would result in temporary construction noise that could adversely impact sensitive species within the MHPA. Construction-related noise from such sources as clearing, grading, and construction vehicular traffic associated with the Project could result in significant, temporary noise-related impacts to the CAGN that was observed in the MHPA on-site. Under long-term operation, significant noise impacts to the MHPA are not anticipated because the Project proposes primarily residential uses adjacent to the MHPA, which does not produce substantial amounts of noise that could adversely affect the MHPA. The Project would be required to comply with the MHPA Land Use Adjacency Guidelines for construction-related noise impacts (refer to Subsection 6.1.4 of *Appendix B*), and would be required to comply with City's General Plan, the OMCPU, ESL Regulations, and the City's Biology Guidelines. With implementation of the Land Use Adjacency Guidelines and compliance with applicable City policies, impacts due to construction and operational noise that could adversely impact sensitive species within the MHPA would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously disclosed in the OMCPU EIR and no further environmental review is necessary for this topic.

HISTORICAL RESOURCES

Would the Project result in the alteration or destruction of a prehistoric or historical archaeological site?

Would the Project result in any adverse physical or aesthetic effects on a prehistoric or historic building, structure, object, or site?

OMCPU EIR

The OMCPU EIR found that impacts to prehistoric and historical resources would include substantial adverse aesthetic impacts as well as adverse physical alteration, relocation, or demolition of prehistoric and historic buildings, structures, objects, landscapes, and sites. The OMCPU EIR also determined that impacts from future development also could occur at the project-level. The OMCPU EIR identified Mitigation Frameworks HIST-1 and HIST-2 to reduce potential aesthetic and physical impacts to prehistoric and historic resources. Mitigation Framework HIST-1 would require the preparation of a site-specific archaeological study and implementation of appropriate mitigation to be conducted prior to the issuance of any permit for a future development project that could potentially affect a prehistoric or historical resource. Mitigation Framework HIST-2 would require the City to determine whether the affected building or structure is historically significant per the Historical Resources Guidelines prior to the issuance of any permit for a future development project that would directly or indirectly affect a building or structure that is more than 45 years of age. The OMCPU EIR concluded that implementation of Mitigation Frameworks HIST-1 and HIST-2 would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of prehistoric and historic resources to below a level of significance. (City of San Diego, 2014b, pp. 5.5-21 through 5.5-28)

LUMINA PROJECT

No Substantial Change from Previous Analysis. In accordance with OMCPU EIR Mitigation Frameworks HIST-1 and HIST-2, a site-specific Cultural Resources Study (*Appendix C1*) and a site-specific Historic Resource Technical Report (*Appendix C2*) were prepared for the Project site by Brian F. Smith and Associates (BFSA), the results of which are discussed below.

Prehistoric Resources

The Project's site-specific Cultural Resources Study found that the Project site contains six isolated prehistoric artifacts, five loci of Site SDI-10,963, one new archeological site (SDI-22,261), and relocated SDI-14,094. Site SDI-10,963 Locus 1 was identified as a multicomponent element of the site, as the surface contained prehistoric lithic artifacts and historic trash. The prehistoric materials associated with Site SDI-10,963 Locus 1 identified on the surface of the Project site are indicative of the Otay Smear while the historic material is consistent with mid-twentieth century practices of rural trash dumping. Site SDI-14,094 included two prehistoric artifacts both consisting of metavolcanic debitage. Site SDI-22,261 was identified as a sparse scatter of prehistoric artifacts located in the eastern section of the Project site and consists of sparse lithic materials similar to neighboring sites in the Otay Mesa region. Archeological Site SDI-7208 was recorded to be within the Project's boundaries; however, no elements of SDI-7208 were identified during the survey, likely because this

site is mapped within the already disturbed roads and rights-of-way included within the Project's off-site improvements. (BFSA, 2018a, pp. 6.0-1 through 6.0-48)

Previously recorded resources on the Project site, including SDI-14,094 and SDI-10,963 were identified, tested, and evaluated for significance. Furthermore, a previously unidentified historic trash deposit within Site SDI-10,963 Locus 1 and one new resource location (SDI-22,261) were tested and evaluated. The Cultural Resources Study noted that subsurface testing of the resources located within the Project site did not produce any significant archaeological artifacts, features, or deposits. Development of the Project site would include grading in the location of SDI-7208, SDI-10,963, SDI-14,094, and SDI-22,261. Due to a lack of unique elements, limited research potential, and based on the criteria listed in CEQA Guidelines § 15064.5, BFSA concluded that each of these sites do not comprise significant prehistoric archeological resources and grading activities associated with the Project would result in less-than-significant impacts to the prehistoric resources on-site. Accordingly, although the Project would result in the alteration or destruction of a prehistoric or historic archeological site, impacts would be less than significant. (BFSA, 2018a, p. 7.0-1)

Although no known significant archaeological resource sites would be impacted by the Project, there is a possibility that archaeological resources may be present beneath the site's subsurface, and may be impacted by future ground-disturbing construction activities associated with the Project. Due to the potential to discover elements of the prehistoric use of the area within the Project boundaries, a potentially significant impact to subsurface prehistoric resources would occur. The OMCPU EIR identified Mitigation Framework HIST-1, which requires implementation of a site-specific mitigation monitoring program. A site-specific mitigation monitoring program is identified in the Project's Cultural Resources Study and is included in Section VI. of this EIR Addendum as Mitigation Measures MM-20 through MM-26. Consistent with the findings in the OMCPU EIR, implementation of OMCPU EIR Mitigation Framework HIST-1, which requires implementation of a site-specific mitigation monitoring program would reduce potentially significant impacts associated with aesthetic and physical alteration or destruction of subsurface prehistoric and historic resources to below a level of significance.

Historic Resources

Under existing conditions, and consistent with the conditions that existed at the time the OMCPU EIR was certified, the Project site is partially developed with scattered structures associated with agricultural operations, with the majority of the Project site comprising relatively level land used for dryland crop production (oats). Four buildings on the Project site meet the 45-year age threshold for historic structures. Each of the four buildings is located at 2160 Cactus Road, and consist of one single-family residence constructed in 1944, a cabin constructed in 1950, and two offices constructed between 1971 and 1974. A Historic Resource Technical Report *(Appendix C2)* was prepared to evaluate the potential historic and/or architectural significance of the structures located at 2160 Cactus Road on the Project site. (BFSA, 2018b, pp. 1-2)

The structures associated with 2160 Cactus Road were evaluated for historic significance as defined by City of San Diego Historical Resources Board (HRB) eligibility criteria, National Register of Historic Places (NRHP) criteria, and California Register of Historical Resources (CRHR) criteria. Please refer to *Appendix C2* for a detailed discussion of the criteria used to evaluate the historic significance of the structures and the analysis of the criteria for the Project site. BFSA found that the structures at 2160

Cactus Road had been substantially altered since the buildings' date of construction and no longer retained original aspects of integrity. The single-family structure on-site was classified as belonging to the Minimal Traditional with Ranch-style influences; however, the structure no longer retains its originally integrity and is not an exemplary reflection of any form of historical, archaeological, cultural, economic, political, aesthetic, landscape, or architectural development. In addition, no historically significant individuals could be associated with the property. BFSA determined the property would not be considered eligible for historic resource designation by the San Diego HRB, CRHR, or NRHP. Because the site is not considered eligible under City of San Diego HRB, CRHR, or NRHP criteria, development of the site associated with the Project would not significantly impact the history or the overall character of the surrounding neighborhood. Due to a lack of integrity or association with significant persons or events, and ineligibility for historic resource designation, BFSA concluded that the buildings at 2160 Cactus Road do not comprise significant historical resources and impacts would be less than significant. (BFSA, 2018b, pp. 44-45)

Conclusion

As indicated in the above analysis of prehistoric and historic resources, the proposed Project would result in less-than-significant impacts due to the alteration or destruction of a prehistoric or historical archaeological site, and due to adverse physical or aesthetic effects on a prehistoric or historic building, structure, object, or site. Grading activities on-site would have the potential to impact subsurface prehistoric resources; however, with implementation of Mitigation Framework HIST-1 requiring implementation of a mitigation monitoring program, and with implementation of the site-specific mitigation monitoring program included in Section VI. of this EIR Addendum as Mitigation Measures MM-20 through MM-26, impacts would be less than significant. Accordingly, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant aesthetic and physical impacts to prehistoric and historic archeological resources. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in any impact to existing religious or sacred uses within the CVSP area?

OMCPU EIR

The OMCPU EIR found that construction of future projects associated with the implementation of the OMCPU would result in significant impacts to religious or sacred uses. The OMCPU EIR concluded that with implementation of mitigation framework HIST-1, impacts to religious or sacred sites would be reduced to below a level of significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project's Cultural Resources Study (*Appendix C1*) included a records search for existing religious or sacred uses on the Project site. The records search did not identify the presence of any sacred sites or locations of religious or ceremonial importance on the Project site or in the surrounding area. Although there are no known religious or sacred resources that occur on-site, ground-disturbing activities associated with the proposed

Project would have the potential to result in significant impacts to religious or sacred resources buried beneath the site's surface. Due to the potential to discover elements of religious or sacred uses within the Project boundaries during ground-disturbing activities, a potentially significant impact to subsurface religious and sacred resources would occur. OMCPU EIR Mitigation Framework HIST-1 requires implementation of a site-specific mitigation monitoring program. Mitigation Measures MM-20 through MM-26 have been included herein in Section VI. of this EIR Addendum to implement Mitigation Framework HIST-1 at the Project level. Consistent with the findings in the OMCPU EIR, implementation of OMCPU EIR Mitigation Framework HIST-1 and Project-specific Mitigation Measures MM-20 through MM-26, would reduce potentially significant impacts to subsurface religious or sacred artifacts within the potential impact area to below a level of significance. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

OMCPU EIR

The OMCPU EIR found that ground-disturbing activities of future implementing development projects associated with the OMCPU could result in significant impacts to human remains that may be buried beneath the surface. The OMCPU EIR concluded that with implementation of Mitigation Framework HIST-1, impacts to human remains would be reduced to below a level of significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project site does not contain a cemetery and no known cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site by BFSA did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Although unlikely, ground disturbing activities associated with the Project could result in significant impacts to human remains, should any human remains exist beneath the site's surface. California State law addresses the treatment of human remains that may be discovered during a construction project. If human remains are encountered during future development of the site, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Furthermore, in accordance with OMCPU EIR Mitigation Framework HIST-1, the Project would be required to comply with the site mitigation monitoring program, included in Section VI. of this EIR Addendum as Mitigation Measures MM-20 through MM-26. The mitigation monitoring program requires contacting the Lead Agency and County Coroner in the event human bones are discovered and also requires contacting the NAHC if the remains are determined to be of Native

American origin. Consistent with the finding of the OMCPU EIR, compliance with applicable State regulations, Mitigation Framework HIST-1, and Project-specific Mitigation Measures MM-20 through MM-26 would ensure that impacts associated with the discovery of human remains would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

Would the Project expose people or property to health hazards, including wildfire and airport operations?

OMCPU EIR

Wildfires

The OMCPU EIR found that future development projects that would implement the OMCPU would have the potential to result in significant impacts related to wildland fires. The OMCPU EIR identified Mitigation Framework HAZ-1 to reduce impacts. Mitigation Framework HAZ-1 requires future projects to incorporate measures in accordance with the City's Brush Management Regulations and Landscape Standards intended to reduce the risk of wildfires. The OMCPU EIR concluded that compliance with applicable policies of the 2010 Fire Code, LDC, and California Building Code and implementation of Mitigation Framework HAZ-1 would reduce impacts related to wildland fires to below a level of significance. (City of San Diego, 2014b, pp. 5.6-17 through 5.6-21)

Airports

The OMCPU EIR found that future development projects associated with the OMCPU would have the potential to result in significant impacts related to airport operations at the Abelardo L. Rodriguez International Airport and Brown Field Municipal Airport. The OMCPU EIR identified Mitigation Framework HAZ-2 to reduce impacts. Mitigation Framework HAZ-2 would require future development projects to obtain a Federal Aviation Administration (FAA) determination of "No Hazard to Air Navigation." The OMCPU EIR concluded that compliance with applicable policies of the LDC, and California Building Code and implementation of Mitigation Framework HAZ-2, impacts related to airport operations would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.6-18 through 5.6-21)

LUMINA PROJECT

Wildfires

No Substantial Change from Previous Analysis. As discussed in the OMCPU EIR, the Project site is located adjacent to natural open space areas; thus, the Project site is subject to a significant risk of wildfire hazards. However, future site-specific discretionary actions for the Project site would be subject to OMCPU EIR Mitigation Framework HAZ 1, which requires future projects to incorporate sustainable development practices into site plans in accordance with the City's Brush Management Regulations and Landscape Standards pursuant to General Plan and OMPCU policies intended to reduce the risk of wildfires, and further requires review for compliance with applicable state and

local regulations. Mitigation Framework HAZ-1 also requires that all future projects be reviewed by the City for compliance with the 2010 California Fire Code, Section 145.07 of the LDC, and Chapter 7 of the California Building Code. Furthermore, Subsection 2.5.3.5 of the CVSP requires that all future implementing development within the Central Village, including the proposed Project, must comply with Land Development Code § 142.0412, *Brush Management*. Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with wildfire hazards would be less than significant and no further environmental review is necessary for this topic.

Airports

No Substantial Change from Previous Analysis. The Project site is located approximately 0.25 mile south of the Brown Field Municipal Airport (Google Earth, 2018). The Project site is located within the Airport Influence Area (AIA) for the Brown Field Municipal Airport and is subject to the Brown Field Municipal Airport Land Use Compatibility Plan (ALUCP), which was adopted in January 2010 (ALUC, 2010, Exhibit III-6). The Project site is identified by the ALUCP as being located in "Zone 6 – Traffic Pattern Zone" (ALUC, 2010, Exhibit III-2). Lands within Zone 6 are considered to have a "low" risk for impacts due to airport operations (ALUC, 2010, Appendix C, Table C-1). The Project would be developed in accordance with the land uses identified by the CVSP. The CVSP was submitted to the San Diego County Regional Airport Authority (SDCRAA), which serves as the Airport Land Use Commission (ALUC) for Brown Field, for a consistency determination with the ALUCP. A consistency determination was required to ensure that the land uses and development standards proposed by the CVSP were consistent with the ALUCP. The CVSP was determined to be consistent with the Brown Field Municipal Airport ALUCP by the ALUC on February 24, 2017 (ALUC, 2017). Thus, because the Project would be developed in accordance with the land uses in the CVSP, the Project would be consistent with the Brown Field Municipal Airport ALUCP. In addition, the Project would be subject to Design Standard 2.2-12 of the CVSP, which requires all developments to comply with the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code, which implements the policies and criteria in the Airport Land Use Compatibility Plan (ALUCP) applicable to Brown Field Municipal Airport (T&B Planning, 2017).

In addition, future discretionary actions associated with buildout of the proposed Project would be required to comply with OMCPU EIR Mitigation Framework HAZ-2, which requires future development projects to obtain a FAA determination of "No Hazard to Air Navigation." Accordingly, because the CVSP and OMCPU are consistent with the ALUCP, and because the Project would be developed in accordance with the CVSP, impacts associated with aircraft hazards would be less than significant, consistent with the conclusion reached in the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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 Project expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?

OMCPU EIR

The OMCPU EIR found that the OMCPU would site residential 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, the OMCPU EIR noted that 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 OMCPU area. However, the OMCPU EIR concluded that the designation of truck routes within the OMCPU area with roadway improvements in conjunction with the circulation network would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Additionally, the OMCPU EIR noted that implementation of the policies contained in the General Plan, OMCPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA), California Department of Health Services (DHS), County of San Diego Department of Environmental Health (DEH), and Caltrans would reduce potential impacts to below a level of significance. As such, the OMCPU EIR concluded that impacts due to the exposure of people or the environment to a significant hazard through the release of hazardous substances or routine transport, use, or disposal of hazardous materials would be less than significant and no mitigation was required. (City of San Diego, 2014b, pp. 5.6-21 through 5.6-26)

LUMINA PROJECT

No Substantial Change from Previous Analysis. A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project site by C Young Associates (CYA), and is included as *Appendix D1*. According to available historical resources, the Project site was used for agricultural, nursery, equestrian, and residential uses from 1953-2013, which indicates soils on site may contain hazardous materials (CYA, 2017a, pp. 31-34). Additionally, there is a potential for hazardous materials impacts due to proposed demolition and construction activities and during long-term Project operation. Each is discussed below.

Recognized Environmental Conditions (RECs)

Based on a review of historic regulatory agency hazardous materials databases, historic site aerial photographs, interviews with property owners, and a reconnaissance of the Project site, the Phase I ESA identified two Recognized Environmental Conditions (REC) affecting the Project site under existing conditions. The Project contains a debris filled canyon in the southwestern portion of the site and former reservoir areas located in the southwestern and northeastern portions of the Project site, which have been documented to contain some degree of impacted soil. In addition, areas of petroleum hydrocarbon stained soil were previously noted in the eastern portion of the

Project site in areas of above-ground storage tanks (ASTs) and drums. The Project's Phase I ESA found that the referenced impacted materials do not represent a significant risk to human health and the environment. Furthermore, such materials (if/when encountered) would be properly managed during future Project site construction activities. The proper handling of such materials would be completed in accordance with the DEH-approved Soil Management Plan (SMP) (*Appendix D2)* for the Project site, which was prepared in accordance with Mitigation Framework HAZ-3. Compliance with the recommendations of the SMP is required by Project-specific Mitigation Measure MM-27, which is included in Section VI. of this EIR Addendum. With implementation of Mitigation Measure MM-27, impacts would be reduced to less than significant. (CYA, 2017a, p. 42; CYA, 2017b)

The Phase I ESA also identified one development-related constraint affecting the Project site under existing conditions. The Project site has been historically used for agricultural purposes. In addition, the presence of OCPs in soil at the Project has been well documented. During historical agricultural activities throughout the State of California, OCPs were commonly and legally applied during the normal course of agricultural operations. Such compounds have since been banned from production and use in the United States. Section 105215 of the California Health and Safety Code discusses the regulatory reporting of incidents that pertain to pesticide spills and accidental releases of pesticide products. Based on the regulatory and historical research completed during the preparation of the Project's Phase I ESA and prior assessments, there is no indication that a spill or release of pesticide products has occurred on the Project site. In addition, neither stressed vegetation nor evidence of the storage of OCP-based chemical products was observed on the Project site during the site reconnaissance or based on regulatory and historical research reviews. As such, the historical agricultural use of the Project is not considered to be a REC. However, such soil is considered to be a development constraint in connection with the Project site that would be properly managed as required by the DEH-approved SMP (*Appendix D2)* for the Project site. Compliance with the recommendations of the SMP is required by Mitigation Measure MM-27 (refer to Section VI. of this EIR Addendum). With implementation of Mitigation Measure MM-27, impacts would be reduced to less than significant. (CYA, 2017a, p. 42; CYA, 2017b)

Environmental Issues

An environmental issue refers to environmental concerns identified by CYA, which do not qualify as RECs but warrant further discussion. Several containers of chemical and petroleum products were observed on the Project site or referenced in the prior 2013 Phase I ESA report conducted on the eastern portions of the Project site. The property located at 2160 Cactus Road located in the eastern portion of the Project site contained the following materials: Gear/motor oil in two 100-gallon containers, multiple 55-gallon drums, 5-gallon containers, fuel treatment product in 55-gallon drum, general automobile/equipment maintenance supplies/products in multiple retail-sized containers, general cleaning supplies/products in multiple retail-sized containers, fertilizer products in two 330-gallon ASTs, detergent products in multiple 55-gallon drums, pesticides, insecticides, and herbicides in multiple retail-sized containers. The property located at 2240 Cactus Road located in the eastern and southeastern portion of the Project site contained the following materials: motor oil, grease products, and paint products in multiple retail-sized containers, various solid fertilizer products in bags, liquid fertilizer product in a 50-gallon container, motor/hydraulic oil in 55-gallon drums, general automobile/equipment maintenance supplies/products in multiple retail-sized containers, and propane in two ASTs. No significant releases of hazardous substances and/or petroleum products were observed or noted by CYA on the Project site. No staining or other suspect conditions

were noted by CYA in the vicinity of such materials. Accordingly, impacts associated with the above-listed hazardous substances/petroleum products would be less than significant, and these materials would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2017a, p. 38)

Containers of hazardous waste including used oil filters in a 55-gallon drum, used oil in a 55-gallon drum, and waste oil in a 500-gallon AST were observed or noted on the Project site. No significant releases of hazardous wastes were observed or noted on the Project site. No staining or other suspect conditions were noted in the vicinity of the waste generation/storage/disposal hazardous wastes noted on the Project site. Accordingly, impacts associated with the above-listed waste generation/storage/disposal hazardous wastes would be less than significant, and these materials would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2017a, p. 39)

In addition to the ASTs on the Project site noted above, at least six additional ASTs were observed on the Project site that appeared to be empty. The ASTs ranged in capacity from 500 to 1,000-gallons and were observed at the 2160 and 2240 Cactus Road portions of the Site. No staining or other suspect conditions were noted in the vicinity of the ASTs. Accordingly, impacts associated with the above listed ASTs would be less than significant, and these ASTs would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2017a, p. 39)

One ground-mounted electrical transformer is reportedly present at the 2440 Cactus Road portion of the Project site. The transformer is reportedly owned by SDG&E. SDG&E reported that it has never specified polychlorinated biphenyl (PCBs) in its transformers. No additional follow-up or action is required relative to the transformer. Accordingly, impacts associated with PCB-containing equipment would be less than significant. (CYA, 2017a, p. 39)

In addition to the drums discussed above, there were at least two dozen additional drums (steel and plastic) observed at the Project site that appeared to be empty. These drums were observed at the 2160 and 2240 Cactus Road portions of the Project site. No staining or other suspect conditions were noted in the vicinity of the drums. Accordingly, impacts associated with drums on the Project site would be less than significant, and the drums would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2017a, p. 39)

No areas of significantly stained soil were observed on the Project site. There was some staining observed on the concrete slab within structures located at the 2160 Cactus Road portion of the Project site. This staining is considered to be de minimis and not of significant concern to the underlying subsurface soil. Accordingly, impacts associated with stained soil or pavement would be less than significant, and would be removed from the site in accordance with applicable regulations as part of the Project's demolition phase of construction. (CYA, 2017a, p. 39)

According to the Phase I ESA, there are reportedly septic tanks/systems present on the Project site at the 2160, 2240 and 2440 Cactus Road areas. Some septic tank/system areas at the Project site were previously assessed during prior subsurface investigations completed at the Project site with no significant impacts noted. (CYA, 2017a, p. 40)

Varying amounts of surficial miscellaneous trash and debris were observed throughout the Project site, specifically in the southern, central, and northern portions of the Project site. The trash and debris observed were noted as non-hazardous solid wastes. These materials generally consisted of wood fragments, scrap metal, landscape waste, pipe fragments, abandoned appliances and furniture, automobile tires, concrete rubble, asphalt fragments and miscellaneous paper, plastic and glass products. The majority of the materials were noted as being present within portions of the canyon areas in the northwestern and southwestern areas of the Project site and in varying level areas in the vicinity of structures throughout the southern and eastern portions of the Project site. CYA also noted that there is documented buried trash and debris in the canyon area present in the southwestern portion of the Project site. These materials would be slated for removal during future soil management activities to be conducted during Project site development and under the DEH-approved SMP (*Appendix D2)* for the Project site. Compliance with the recommendations of the SMP is required by Mitigation Measure MM-27 (refer to Section VI. of this EIR Addendum). With implementation of Mitigation Measure MM-27, impacts would be reduced to less than significant. (CYA, 2017a, p. 40; CYA, 2017b)

Tripp Salvage Landfill

Approximately 0.2 acre of the northern portion of the Project site is located within the boundary of the Tripp Salvage Landfill (herein "Tripp Landfill"), which is a former salvage landfill located north of the Project site within (Accessors Parcel Number 646-100-75). The Tripp Landfill is listed in the CalRecycle Solid Waste Information System (SWIS) as Number 37-CR-0011. In June 2005, the County of San Diego Department of Environmental Health as Lead Agency issued City of San Diego SDP No. 219697 for the remediation and closure of the Tripp Landfill. On October 17, 2017, a Certificate of Completion was issued for the Tripp Landfill which indicated all necessary remedial action associated with SDP No. 219697.

The City of San Diego, acting as the Local Enforcement Agency (LEA), reviewed the Project and determined that the Project does not pose a threat to public health and safety or the environment related to the 0.2-acre area of the Project site that encompasses a portion of the former Tripp Landfill. Furthermore, LEA would continue to monitor the status of the landfill, as required by City of San Diego Conditions of Approval in order to ensure that the Project would not conflict with the former landfill throughout Project construction. With implementation of City of San Diego Conditions of approval, impacts would be reduced to less than significant.

Construction Activities

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site during the demolition and construction phases of the Project. This heavy equipment would likely be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors

would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA, California Department of Toxic Substances Control (DTSC), SDAPCD, and San Diego Regional Water Quality Control Board (RWQCB). With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase, and impacts would be less than significant.

Long-Term Operation

The future residential and commercial uses proposed as part of the proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Although the proposed Project provides more specificity about the location and intensity of land uses on the Project site than did the OMCPU, the allowance of residential land uses to be developed in close proximity to existing and planned industrial uses that may utilize hazardous substances is the same. Therefore, consistent with the conclusion reached by the OMCPU EIR, the Project would have the potential to expose people to hazards associated with hazardous materials. However, as discussed in the OMCPU EIR, future site-specific discretionary actions would be required to comply with the General Plan and OMCPU policies and design guidelines that minimize collocation issues, which require site-specific analyses to address impacts associated with the collocation of residential uses in close proximity to industrial uses with hazardous or toxic substances to ensure that impacts would be less than significant (City of San Diego, 2014a, p. LU-19).

Additionally, trucks serving nearby industrial land uses would have the potential to expose Project residents to hazards associated with the release of hazardous materials. However, as discussed in the OMPCU EIR, improved roadway and transportation modifications pursuant to the OMCPU Mobility Element and the CVSP's Mobility Element would reduce the potential risk of exposure. Risks also would be reduced because Siempre Viva Road is identified by the OMCPU as a "Truck Activity Road," providing connections between industrial uses to the south of the Project site and "Truck Routes" located to the east; thus, the amount of truck traffic along Cactus Road adjacent to the Project site would be reduced. In addition, the Project is within the CVSP and would be subject to compliance with the CVSP design standards related to collocation which would ensure that future site-specific discretionary actions provide adequate buffers to separate uses from truck traffic and industrial uses located east of Cactus Road (see CVSP Policies 2.5-42 and 2.5-43) (T&B Planning, 2017). The Project also would be subject to CVSP Design Standard 2.2-11, which requires the installation of mechanical air filtration systems within residential units in areas near SR-905 and residential units in areas within 500 feet of the southern and eastern boundaries of Planning Areas 5 and 8, and would reduce potential impacts due to collocation of residential and industrial land uses to less-than-significant levels (T&B Planning, 2017). Furthermore, the Project's Phase I ESA did not identify any hazardous conditions related to surrounding land uses or activities. Accordingly, and consistent with the findings of the OMPCU EIR, a less-than-significant impact would occur.

Conclusion

As noted above, and with implementation of mandatory regulatory requirements and standard conditions of approval, the Project would result in less-than-significant impacts due to the routine

transport, use, or disposal of hazardous materials, and less-than-significant impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that the OMCPU area contained hazardous material sites pursuant to Government Code Section 65962.5 and that these sites, along with any unknown hazardous sites within the OMCPU area, would have potentially significant impacts on future development and land uses within the OMCPU area. The OMCPU EIR identified Mitigation Framework HAZ-3 to reduce impacts, which requires the preparation of a Phase I Site Assessment prior to the approval of implementing development and to require that all on-site contamination be avoided or remediated in compliance with local, state, and federal regulations. The OMCPU EIR concluded that with compliance to General Plan and OMCPU policies and local, state, and federal regulations, and implementation of Mitigation Framework HAZ-3, potential impacts associated with hazardous sites would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.6-26 through 5.6-28)

LUMINA PROJECT

No Substantial Change from Previous Analysis. According to the Project's Phase I ESA, and consistent with the findings of the OMCPU EIR, the Project site contains two hazardous sites, including the Martinez Ranch Compound located at 2160 Cactus Road and the Martinez Ranch Canyon Fill located approximately 0.25 mile southwest of the Martinez Ranch Compound. The Project site contains a debris-filled canyon in the southwestern portion of the site and former reservoir areas located in the southwestern and northeastern portions of the Project site, which have been documented to contain some degree of impacted soil. In addition, areas of petroleum hydrocarbon stained soil were previously noted in the eastern portion of the Project site in areas containing ASTs and drums. The Project's Phase I ESA found that the referenced impacted materials do not represent a significant risk to human health and the environment. Furthermore, such materials (if/when encountered) would be properly managed during future Project site construction activities. The proper handling of such materials would be completed in accordance with the DEH-approved SMP (*Appendix D2)* for the Project site. Compliance with the recommendations of the SMP is required by Mitigation Measure MM-27 in Section VI. of this EIR Addendum. With implementation of Mitigation Measure MM-27, impacts would be reduced to less than significant. (CYA, 2017a, p. 42; CYA, 2017b)

The Phase I ESA also identified one development-related constraint affecting the Project site under existing conditions. The Project site has been historically used for agricultural purposes. In addition, the presence of OCPs in soil at the Project has been well documented. During historical agricultural activities throughout the State of California, OCPs were commonly and legally applied during the

normal course of agricultural operations. Such compounds have since been banned from production and use in the United States. Section 105215 of the California Health and Safety Code discusses the regulatory reporting of incidents that pertain to pesticide spills and accidental releases of pesticide products. Based on the regulatory and historical research completed during the preparation of the Project's Phase I ESA and prior assessments, there is no indication that a spill or release of pesticide products has occurred on the Project site. In addition, neither stressed vegetation nor evidence of the storage of OCP-based chemical products was observed on the Project site during the site reconnaissance or based on regulatory and historical research reviews. As such, the historical agricultural use of the Project is not considered to be a REC in connection with the Project site. However, such soil is considered to be a development constraint in connection with the Project site that must be properly managed in accordance with the DEH-approved SMP (*Appendix D2)* for the Project site. Compliance with the recommendations of the SMP is required by Mitigation Measure MM-27 in Section VI. of this EIR Addendum. With implementation of Mitigation Measure MM-27, impacts would be reduced to less than significant. (CYA, 2017a, p. 42; CYA, 2017b)

As noted above, the Project site contains hazardous materials sites pursuant to Governments Code Section 65962.5 which would have potentially significant impacts on future development and land uses on the Project site. The Project would be required to comply with mandatory regulatory requirements and standard conditions of approval. Furthermore, in accordance with Mitigation Framework HAZ-3 and Project-specific Mitigation Measure MM-27 (refer to Section VI. of this EIR Addendum), the Project would be required to comply with the site-specific SMP (*Appendix D2*) which was approved by County DEH in 2017 to address remediation of contaminated soils on-site. Furthermore, Mitigation Framework HAZ-3 requires the applicant obtain written authorization from the regulatory agency confirming the completion of remediation. Consistent with the findings of the OMCPU EIR, mandatory compliance with local, state, and federal regulations and implementation of Mitigation Framework HAZ-3 and Project-specific Mitigation Measure MM-27 would reduce impacts associated with hazardous sites to less-than-significant levels after mitigation. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

HYDROLOGY AND WATER QUALITY

Would the Project result in an increase in impervious surfaces and associated increased runoff?

Would the Project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, and would result in substantial alterations to on- and off-site drainage; therefore, the OMCPU EIR found that buildout of the OMCPU would result in potentially significant impacts associated with increased runoff which could result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The OMCPU EIR identified Mitigation Framework HYD/WQ-1, which generally requires that the design

and function of future projects do not impact downstream drainage patterns. Mitigation Framework HYD/WQ-2 also was identified, and requires that future projects be sited and designed to minimize impacts on receiving waters in order to reduce pollutants and mitigate impacts in accordance with the Stormwater Requirements. The OMCPU EIR found with implementation of Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, impacts due to the creation of runoff water which would exceed stormwater drainage system capacity or provide substantial additional sources of polluted runoff would be less than significant.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project conforms to the land use configurations and intensities identified in the Addendum prepared for the CVSP and generally conforms to the land use configurations and intensities identified in the OMCPU EIR.

Future development associated with the Project would increase impervious surfaces in the Project area, which would lead to increased runoff that could exceed the capacity of existing or planned stormwater drainage systems and/or provide additional sources of polluted runoff. However, the Project is required to design storm drain systems that comply with OMCPU and CVSP policies pertaining to the development of adequate storm drain facilities, including OMCPU Policies 6.3-1 through 6.3-5 and CVSP Design Standards 2.6-5 through 2.6-12, which require future projects to use sustainable infrastructure design to capture and control runoff, incorporate Best Management Practices (BMPs), improve drainage facilities in conjunction with development projects, implement the City's Master Storm Water System Maintenance Program to ensure storm conveyance facilities remain free of debris that can reduce their capacity, and coordinate with the City engineer to monitor and improve storm water systems in the Project area. (City of San Diego, 2014a, p. PF-5; T&B Planning, 2017). Additionally, in accordance with the City's Municipal Storm Water Permit, future development projects would be required to implement BMPs during construction.

In addition to the policies discussed above and contained in the OMCPU and the proposed CVSP, future implementing projects would be required to comply with OMCPU EIR Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2. All future implementing projects would be required to meet the standards outlined in the City of San Diego Drainage Design Manual and would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. Mitigation Framework HYD/WQ-1 requires the designs of a new or improved system to meet local and state regulatory requirements to the sanctification of the City Engineer and Mitigation Framework HYD/WQ-2 requires the Project Applicant to demonstrate that the Project is sited and designed to minimize impacts on receiving waters and mitigate impacts in accordance with the City of San Diego Stormwater Requirements.

Under existing conditions, the Project site is used mostly for agricultural uses, with a few residences and buildings scattered through the site. The majority of drainage on the Project site drains to the south to a steep finger canyon (Wruck Creek) located west of the Cactus Road and Siempre Viva Road intersection. Two of the finger canyons drain to sump areas that are collected and drained to the west and discharged downstream within the canyon via an existing reinforced concrete pipe (RCP) storm drain per City Drawing 23871-21-D. A portion of the Project area drains to the northwest to a canyon on the north side of the area proposed for Airway Road on-site. A small portion of the Project site located along Cactus Road north of Airway Road drains to the north along

Cactus Road and drains to a culvert in Cactus Road. After crossing Cactus Road, the runoff converges with other runoff draining from upstream areas including Caltrans right-of-way and then drains to the upstream point of the North Canyon. The site's existing drainage is divided into two main drainage areas, North and South, and includes four subareas. (PDC, 2018a, pp. 4-5)

The Project proposes to maintain the existing overall drainage pattern and proposes the construction of two combined biofiltration, hydromodification, and detention basins (Basin 1 and Basin 2). Basin 1 would be constructed in the southeastern portion of the Project site and Basin 2 would be constructed in the northern portion of the Project site, north of the area of proposed Airway Road. The Project also proposes construction of a storm drain system consisting of inlets, pipes, brow ditches, and roof drains. In order to evaluate the Project's proposed drainage conditions, a Project-specific Drainage Study was prepared for the Project is contained in *Appendix E1*. Table 5, *Existing vs. Proposed Flows for the North Basin*, and Table 6, *Existing vs. Proposed Flows for the South Basin*, presents the existing and the Project's proposed drainage patterns and rates of runoff. The proposed drainage areas are discussed below.

Table 5 Existing vs. Proposed Flows for the North Basin

Return Period	Pre-project Qpeak (cfs)	Post-project - Mitigated Q (cfs)
LF = 0.5xQ2	4.321	2.016
2-year	8.642	4.032
5-year	11.804	4.598
10-year	14.502	6.635

(PDC, 2018b, Table 2)

Table 6 Existing vs. Proposed Flows for the South Basin

Return Period	Pre-project Qpeak (cfs)	Post-project - Mitigated Q (cfs)
LF = 0.5xQ2	5.886	2.241
2-year	11.772	4.482
5-year	18.052	11.162
10-year	21.327	14.182

(PDC, 2018b, Table 3)

- **Southern Basin System 1000:** System 1000 would consist of approximately 63.4 acres of land. Under post-development conditions, the flows in System 1000 would drain to the south and into proposed Basin 1 in the southeastern portion of the Project site. The outlet of Basin 1 would drain toward the existing headwall per Drawing 23871-21-D. (PDC, 2018a, pp. 6, 10)

- **Southern Basin System 2000:** System 2000 would consist of approximately 8.2 acres of land and represents the run on area draining onto the Project site from upstream areas to the west of the Project site. Under post-development conditions, the flows in System 2000 would collect the portion of future flows from Trails Park, a portion of which is located in the southwestern portion of the Project site. Flows would continue to drain towards the existing headwall per Drawing 23871-21-D. (PDC, 2018a, pp. 6, 10)

- **Northern Basin System 3000:** System 3000 would consist of approximately 0.9 acre of land and represents the drainage area that drains to the northerly canyon. Flows from System 3000 would bypass Basin 2 located in the northern portion of the Project site. This drainage area includes a portion of Airway Road. (PDC, 2018a, pp. 6-7, 10)

- **Northern Basin System 4000:** System 4000 would consist of approximately 33.9 acres of land and represents the drainage area that drains to the northwest to Basin 2 and then outlets to the proposed storm drain outfall to the northerly canyon. A portion of existing Airway Road east of Cactus Road drains to the basin, so the ultimate width is used for sizing calculations, even though the Project's proposed widening would be widened to an interim width. (PDC, 2018a, pp. 7, 10)

- **Northern Basin System 5000:** System 5000 would consist of approximately 1.9 acres of land and represents the Cactus Road drainage area that drains to the north along Cactus Road under existing conditions. Under proposed conditions, flows would continue to drain north along Cactus Road toward the existing culvert located approximately 600 feet north of the Project site. (PDC, 2018a, pp. 7, 10)

Based on the proposed drainage facilities described above, upon buildout of the proposed Project, the rate of storm water runoff from the site would be decreased as compared to the runoff flow rates that occur under existing conditions. As shown in Table 7, *Existing vs. Proposed Overall Drainage Calculations*, the area contributing to drainage facilities would increase slightly by 0.5 acre and runoff under the 100-year storm flow scenario would be decreased by 61.2 cubic feet per second (cfs) with implementation of the Project. Although the Project would result in an increase in impervious surfaces, the Project would decrease runoff as compared to existing conditions and would not result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. The Project's Drainage Plan has been designed to meet the City's stormwater requirements and would generally retain the site's existing topographic character, except as necessary to allow for proper drainage flows and comply with current storm water requirements. Accordingly, and consistent with the findings of the OMCPU EIR, the Project's impacts associated with increased runoff which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Table 7 Existing vs. Proposed Overall Drainage Calculations

	EXISTING CONDITIONS			PROPOSED CONDITIONS		
Outfall of Interest	*System*	*Q_{100} (cfs)*	*Contrib. Area (acres)*	*System*	*Q_{100} (cfs)*	*Contrib. Area (acres)*
North	System 300	37.7	30.1	System 3000	3.9	0.9
	System 500	11.7	7.7	System 4000	105.6 undetained 13.4 detained	33.9
				System 5000	6.9	1.9
	Subtotal:	**49.4**	**37.8**	**Subtotal:**	**24.2**	**36.7**
South	System 100	28.4	20.7	System 1000	151.6 undetained 36.2 detained	63.4
	System 200	54.0	49.3	System 2000	10.2	8.2
	Subtotal:	**82.4**	**70.0**	**Subtotal:**	**46.4**	**71.6**
	Total:	**131.8**	**107.8**	**Total:**	**70.6**	**108.3**

(PDC, 2018a, Table 2)

What modifications to the natural drainage system would be required for implementation of the Project?

Would there be an effect on the Otay or Tijuana River Valley drainage basins with implementation of the Project?

OMCPU EIR

The OMCPU EIR disclosed that buildout in accordance with the OMCPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties within the Otay and Tijuana River Valley drainage basins. Therefore, implementation of the OMCPU was determined to have the potential to result in significant direct and indirect impacts to the natural drainage system. (City of San Diego, 2014b, p. 5.7-25) The OMCPU EIR also found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, which could in turn result in increased risks of erosion hazards on- and off-site. (City of San Diego, 2014b, p. 5.7-26) The OMCPU EIR identified Mitigation Framework HYD/WQ-2, which among other measures requires a reduction in impervious surfaces; avoidance of areas particularly susceptible to erosion and sediment loss; and compliance with the RWQCB and NPDES

requirements. Additionally, the OMCPU EIR noted that all future development within the OMCPU would be subject to the City's Storm Water Standards as well as applicable General Plan and OMCPU policies related to erosion hazards. Compliance with the required mitigation was found to reduce impacts to less-than-significant levels. (City of San Diego, 2014b, p. 5.7-30)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project site is located within the Tijuana River Valley drainage basin. The Project would allow for future development that would increase impervious surfaces in the Project area, which would lead to increased runoff that could result in modifications to the natural drainage system or affect the Tijuana River Valley drainage basin. However, the Project is required to design storm drain systems that comply with OMCPU and CVSP policies pertaining to the development of adequate storm drain facilities, including OMCPU Policies 6.3-1 through 6.3-5 and CVSP Design Standards 2.6-5 through 2.6-12, which require future projects to use sustainable infrastructure design to capture and control runoff, incorporate BMPs, improve drainage facilities in conjunction with development projects, implement the City's Master Storm Water System Maintenance Program to ensure storm conveyance facilities remain free of debris that can reduce their capacity, and coordinate with the City engineer to monitor and improve storm water systems in the Project area. (City of San Diego, 2014a, p. PF-5; T&B Planning, 2017). Additionally, in accordance with the City's Municipal Storm Water Permit, future development projects would be required to implement BMPs during construction.

In addition to the policies discussed above and contained in the OMCPU and CVSP, future implementing projects would be required to comply with OMCPU EIR Mitigation Framework HYD/WQ-2. Mitigation Framework HYD/WQ-2 requires the Project Applicant to demonstrate that the Project is sited and designed to minimize impacts on receiving waters and to mitigate impacts in accordance with the City of San Diego Stormwater Requirements.

As discussed above under the analysis of Threshold a, implementation of the Project would generally maintain the natural drainage system in the area and would result in reduced stormwater flows compared to existing conditions. The Project would construct two detention basins that would serve as biofiltration, hydromodification, and detention basins for the Project site. Upon buildout of the proposed Project storm water runoff from the site would be decreased as compared to the runoff flow rates that occur under existing conditions. As shown in Table 7, the area contributing to drainage facilities would increase slightly by 0.5 acre and peak runoff under the 100-year storm flow scenario would be decreased by 61.2 cfs with implementation of the Project. Although the Project would result in an increase in impervious surfaces, the Project would decrease in the rate of runoff as compared to existing conditions and would not result in modifications to the natural drainage system and would not adversely affect the Otay or Tijuana River Valley drainage basins. The Project's Drainage Plan has been designed to meet the City's stormwater requirements and would generally retain the site's existing topographic character, except as necessary to allow for proper drainage flows and comply with current storm water requirements. The existing downstream stormwater drainage facilities have adequate capacity to handle the Project's slight increase in area contributing runoff to drainage facilities.

Accordingly, and consistent with the findings reached in the OMCPU EIR, runoff from the Project site would not substantially alter the existing drainage pattern of the Project site in a manner that would

result in substantial impacts on-site or substantial impacts to the Otay or Tijuana River Valley drainage basins off-site, and a less-than-significant impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project result in alterations to the course or flow of flood waters?

OMCPU EIR

The OMCPU EIR disclosed that there are only two areas in the OMCPU area subject to flooding conditions: the northwestern portion of the OMCPU area in the Otay River Valley; and the Otay Mesa Creek, which traverses the mesa in a north-south direction near La Media Road. The OMCPU EIR noted that 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 OMCPU drainage study, were found to be subject to the OMCPU Community Plan Implementation Overlay Zone (CPIOZ), which would ensure discretionary review of all future development within these areas. Additionally, the OMCPU noted that Land Development Code § 143.0145 requires that 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, the OMCPU EIR concluded all future projects (both ministerial and discretionary) developed in accordance with the OMCPU 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. Nonetheless, because project-level detail was unavailable at the program-level, the OMCPU EIR concluded that projects under the OMCPU would have the potential to alter the course or flow of flood waters. To address this impact, the EIR imposed Mitigation Framework HYD/WQ-1, which includes specific requirements to preclude flood hazards within the OMCPU or downstream areas. The OMCPU EIR concluded that compliance with Mitigation Framework HYD/WQ-1, the City's Storm Water Standards, and General Plan and OMCPU policies would reduce impacts to less-than-significant levels. (City of San Diego, 2014b, pp. 5.7-24 and 5.7-25)

LUMINA PROJECT

No Substantial Change from Previous Analysis. As noted in the OMCPU EIR and in accordance with the City's 2011 Significance Determination Thresholds, significant impacts associated with altered flow patterns would result if a project-related increase in stormwater flows would increase on- or off-site flooding hazards pursuant to mapped FEMA floodplains (City of San Diego, 2011a, p. 43). The Project site is not located within a mapped FEMA flood zone (City of San Diego, 2014b, Figure 5.7-1); thus, the proposed Project would not result in alterations to the course or flow of flood waters and impacts would be less than significant. Furthermore, the Project is required to comply with Mitigation Framework HYD/WQ-1 which generally requires that the design and function of future projects do not impact downstream drainage patterns. Moreover, as discussed under Threshold a, the Project reduces the 100-year peak flow rates as compared to existing conditions, and would therefore reduce potential flooding impacts to downstream properties (refer to Table 7). Additionally, the Project complies with the City's Storm Water Standards and applicable General Plan and OMCPU policies related to flood hazards. Based on these considerations, and consistent with

the conclusion reached in the OMCPU EIR, the Project would not alter the course or flow of flood waters. Impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The 2014 OMCPU EIR found that future development within the OMCPU area could result in impacts to surface and ground water-quality, and could result in increases in pollutant discharges including downstream sedimentation. However, the OMCPU EIR noted that water quality impacts would be reduced through the required implementation of Low Impact Development (LID) design, the implementation of storm water BMPs, and adherence to all other applicable federal, state, and local regulations. Because specific development proposals were not proposed or evaluated in the OMCPU EIR, the EIR determined that it could not be guaranteed that all future program-level impacts would be avoided or mitigated to below a level of significance. Therefore, the OMCPU EIR identified Mitigation Framework HYD/WQ-2 to reduce surface and ground water quality impacts and pollutant discharge impacts, and requires future projects to be sited and designed to minimize impacts on receiving waters and to mitigate impacts 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). The OMCPU EIR noted that all future implementing projects would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. The OMCPU EIR found with implementation of Mitigation Framework HYD/WQ-2, impacts due to discharges into surface or ground water or due to increases in pollutant discharges including downstream sedimentation would be less than significant.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project conforms to the land use configurations and intensities identified in Addendum No. 408329 and generally conforms to the land use configurations and intensities identified in the OMCPU EIR. The Project is located in the Tijuana River Watershed and is tributary to the Tijuana River and the Tijuana River Estuary. The Tijuana River is identified as being "impaired" in accordance with the Clean Water Act 303(d) list regulation by the following pollutants: eutrophic, indicator bacteria, low dissolved oxygen, pesticides, phosphorus, sedimentation/ siltation, selenium, solids, surfactants, synthetic organics, total nitrogen as "N," toxicity, trace elements, and trash. The Tijuana River Estuary is identified as being "impaired" by the following pollutants: eutrophic, indicator bacteria, lead, low dissolved oxygen, nickel, pesticides, thallium, trash, and turbidity. (PDC, 2018c, pp. 9-10)

Construction associated with the proposed Project and future implementing development on the Project site have the potential to create pollutant discharges that could impact surface and ground

water quality, and have the potential to result in increased pollutant discharges including downstream sedimentation. Each is discussed below

Construction-Related Impacts

The Project would involve grading activities and would allow for future construction activities that would result in the generation of water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the San Diego RWQCB and the City of San Diego, as well as OMCPU EIR Mitigation Framework HYD/WQ-1, future construction activities associated with buildout of the Project would be subject to a NPDES Municipal Stormwater Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. Mandatory adherence to a NPDES Permit would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during construction activities. Compliance with the NPDES permit also requires the preparation and implementation of a SWPPP that would specify the BMPs that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern (including sediment) are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the Project site. Mandatory compliance with the SWPPP would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Consistent with the findings of the OMCPU EIR, water quality impacts associated with construction activities would be less than significant.

Long-Term Operational Impacts

Storm water pollutants commonly associated with the land uses proposed by the Project (i.e., residential and commercial uses) include nutrients, heavy metals, bacteria/virus /pathogens, pesticides, oil and grease, toxic organic compounds, trash, and dry weather runoff, which are considered primary pollutants of concern. The proposed Project would be required to comply with OMCPU EIR Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2 which require the Project implement its site-specific WQMP (*Appendix E3*) to demonstrate compliance with the City's NPDES permit and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a site-specific post-construction water quality management program designed to address the pollutants of concern of a development project via BMPs, implementation of which ensures the on-going protection of the watershed basin. The WQMP identifies permanent source control BMPs, including prevention of illicit discharges into the MS4, storm drain stenciling, protecting materials stored in outdoor work areas from rainfall, and protecting trash storage areas from rainfall (PDC, 2018c, pp. 14-15). The WQMP also identifies additional BMPs based on the following potential sources of runoff pollutants: on-site storm drain inlets, interior floor drains and elevator shaft sump pumps, need for future indoor and structural pest control, landscape/outdoor pesticide use, pools and other water features, refuse areas, fire sprinkler test water, miscellaneous drain or wash water, plazas, sidewalks and parking lots (PDC, 2018c, p. 15). The WQMP also identifies site design BMPs, including maintaining natural drainage

pathways and hydrologic features, conserving natural soils and vegetation areas, minimizing impervious areas, minimizing soil compaction, dispersion of impervious surfaces, and landscaping with native/drought tolerant species (PDC, 2018c, pp. 16-17). These control measures are intended to minimize, prevent, and/or otherwise appropriately treat storm water runoff flows before they are discharged from the site. Compliance with the site-specific WQMP would be required as a standard condition of Project approval and long-term maintenance of on-site BMPs would be required to ensure their long-term effectiveness, thereby ensuring that the Project does not create discharges that would increase pollutant discharges downstream during long-term operation.

Conclusion

The Project would be required to comply with City's Storm Water Runoff and Drainage Regulations and the regulations of other agencies (e.g., RWQCB). Mandatory compliance with State and local regulations, OMCPU EIR Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, future required SWPPP, and the Project's WQMP would ensure that impacts to water quality and pollutant discharge would be reduced to below a level of significance. Accordingly, and consistent with the findings of the OMCPU EIR, impacts due to discharges into surface or ground water, any alteration of water quality, and increases in pollutants, including downstream sedimentation would be less-than-significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

GEOLOGY AND SOILS

Would the Project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?

OMCPU EIR

The OMCPU EIR found that the OMCPU area contains geologic conditions that could expose people or property to geologic hazards at the project-level; therefore, future development associated with implementation of the OMCPU would result in potentially significant impacts related to geologic hazards. The OMCPU EIR noted that although no Alquist-Priolo Earthquake Fault Zones occur within the OMCPU area, the OMCPU area is subject to moderate to high geologic risk area due to the presence of the La Nación Fault Zone, which is located 2.3 miles west of the Project site. Faults in this zone are considered to be potentially active and would subject the OMCPU area to moderate to severe ground shaking. The OMCPU EIR also concluded that the potential for liquefaction and seismically induced settlement on mesa top areas such as the Project site is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. (City of San Diego, 2014b, p. 5.8-6) The OMCPU EIR also disclosed that a complex of deep-seated landslides known as the San Ysidro Landslide is present in the western and southern edges of the OMCPU area. 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. The OMCPU EIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-1, potential impacts related to geologic hazards would be reduced to below a level of significance. (City of San Diego, 2014b, p. 5.8-15)

No Substantial Change from Previous Analysis. In accordance with OMCPU EIR Mitigation Framework GEO-1, which requires future implementing projects to adhere to the City's Seismic Safety Study and prepare a site-specific geotechnical report to reduce potential geologic impacts through site-specific recommendations, a site-specific Geotechnical Report was prepared for the proposed Project by Advanced Geotechnical Solutions, Inc. (AGS) and is included as *Appendix F*. The Geotechnical Report notes that no faults are mapped that traverse or are trending toward the Project site. The Silver Strand section of the Newport-Inglewood-Rose Canyon Fault Zone is the closest known active fault to the Project site and is located approximately nine miles west of the Project site. The risk associated with ground rupture due to faulting is low and impacts as a result of faulting would be less than significant. Major earthquakes occurring on the Newport-Inglewood-Rose Canyon Fault Zone, or other regional active faults located in southern California area, could subject the site to moderate to severe ground shaking, which is the same conclusion reached by the OMCPU EIR. (AGS, 2017, pp. 6-8)

The Geotechnical Report noted that the Project is not located within an area zoned by the County of San Diego as a potential liquefaction area. The potential for liquefaction during a strong earthquake would be limited to areas with localized, loose lenses/layers of sandy soils. Due to the proposed Project's remedial grading and dense nature of the geological formation materials and proposed fills within the limits of the Project area, the risk associated with liquefaction, lateral spreading, or seismically-induced settlement is considered remote. (AGS, 2017, p. 8)

The Geotechnical Report indicates that no landslides have been mapped within the Project site. The nearest mapped landslides are located west of the Project site within canyon drainage areas. The Project site is underlain by essentially flat-lying Lindavista Formation and San Diego Formation. The Otay Formation was also mapped below the San Diego Formation on-site. The Geotechnical Report notes that Otay Formation can be susceptible to mass wasting, due to the common bentonitic clay beds found in the soil unit. Based on site-specific information, the Geotechnical Report determined that the potential for landsliding on-site is low to moderate; however, the use of design avoidance and/or through typical remedial grading measures (removal and recompaction and/or construction of stabilization and buttress fills) would reduce impacts due to landslides to less than significant. (AGS, 2017, pp. 6-7, 17)

As previously noted, the Project complies with OMCPU EIR Mitigation Framework GEO-1, which requires future implementing projects to adhere to the City's Seismic Safety Study and prepare a site-specific geotechnical report to reduce potential geologic impacts through site-specific recommendations. In addition, GEO-1 requires future projects to implement typical remediation measures, to account for expansive soil. The Project's Geotechnical Report (*Appendix F)* includes site-specific recommendations and remedial grading measures that would reduce impacts due to exposure of people or property to geologic hazards to less than significant. Compliance with the Project's Geotechnical Report recommendations is required by Project-specific Mitigation Measure MM-28, which is included herein in Section VI. of this EIR Addendum. Accordingly, and consistent with the finding of the OMCPU EIR, with implementation of Mitigation Measure MM-28 impacts associated with geologic hazards including earthquake faults, ground shaking, liquefaction, and landslides would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as

previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the land use and circulation modifications proposed in the Project increase the potential for erosion of soils on- or off-site?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would result in potentially significant impacts related to soil erosion due to the steep hillsides and loose nature of sedimentary materials and soils contained within the OMCPU area. The OMCPU EIR identified Mitigation Framework GEO-2 to reduce potential impacts, which generally requires future development projects to adhere to the City's Grading Regulations, National Pollutant Discharge Elimination System (NPDES) permit requirements, and the recommendations included in future site-specific geotechnical reports prepared in conformance with the City's Geotechnical Report Guidelines, CBC, and LDC as would be required for implementing developments. The OMCPU EIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-2, impacts associated with erosion would be reduced to below a level of significance.

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Lumina Project would implement the land uses and circulation system established as part of the CVSP, which in turn was adopted to implement the OMCPU. Thus, the Project does not entail any land use or circulation modifications. Notwithstanding, construction activities and long-term operational activities associated with the Project would have the potential to result in the increased potential for erosion either on or off site. Each is discussed below.

Construction-Related Activities

Grading activities that would occur as part of the proposed Project would expose underlying soils, which would increase erosion susceptibility during grading activities. Exposed soils could be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading (before landscaping becomes established). Erosion by wind would be highest during periods of high wind speeds. With the exception of two reentrant canyons in the northwest and southwest portions of the site, the property is generally flat and erosion potential is not substantial.

Pursuant to the requirements of the State Water Resources Control Board, grading activities associated with the proposed Project and construction associated with future implementing development projects would be required to obtain a NPDES permit for construction activities. A NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area. The City's Municipal Separate Storm Sewer System (MS4) NPDES Permit requires the Project Applicant to prepare and submit to the San Diego Regional Quality Control Board (SDRQCB) for approval a Project-specific Storm Water Pollution Prevention Plan (SWPPP), which would address erosion during construction.

The SWPPP must identify and implement an effective combination of erosion control and sediment control measures (i.e., Best Management Practices, or BMPs) to reduce or eliminate discharge to surface water from storm water and non-storm water discharges. Adherence to the requirements noted in the Project's required site-specific SWPPP during construction activities on- and off-site would further ensure that potential erosion and sedimentation effects would be less than significant. Consistent with the findings of the OMCPU EIR, mandatory adherence to the requirements noted in the site-specific SWPPP, as would be required for the proposed Project, would ensure that potential construction-related effects associated with water erosion would be less than significant.

During grading and other construction activities involving soil exposure or the transport of earth materials, § 142.0101 et seq. of the City of San Diego Municipal Code, which establishes grading regulations, also would apply (City of San Diego, 2018, § 142.0101 et seq). Furthermore, and consistent with the findings of the OMCPU EIR, the Project Applicant prepared a site-specific geotechnical investigation (*Appendix F*) and hydrology study (*Appendix E1*) to identify measures needed in the long term reduce erosion at the project level. Compliance with the recommendations of the site-specific geotechnical investigation is required by Project-specific Mitigation Measure MM-28, which is included in Section VI. of this EIR Addendum. Consistent with the findings of the OMCPU EIR, mandatory compliance with regulatory requirements, policies, and Mitigation Measure MM-28 would ensure that water and wind erosion impacts during construction would be less than significant.

Long-Term Operational Activities

Following construction of future implementing development projects, wind and water erosion on the Project site would be minimized, as the Project proposes urban land uses and the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, future implementing projects would be subject to compliance with the drainage and hydromodification requirements contained in the preliminary hydrologic analyses prepared for the Project (included as *Appendix E1 and Appendix E2*, respectively). In addition, the Project's Stormwater Quality Management Plan (WQMP) requires Structural Storm Water BMPs to reduce pollutants in stormwater runoff and hydromodification requirements to control runoff volumes and flow durations in accordance with the City's MS4 Permit. In addition, the CVSP contains drainage standards that require future implementing projects, including the proposed Project, to incorporate one of the five BMP strategy options contained in the CVSP's hydrologic study (see Section 2.6.2 of the Specific Plan). Compliance with these requirements would ensure that the rate of runoff from the site does not increase in comparison to existing conditions, thereby precluding the potential for increased erosion hazards downstream. Therefore, implementation of the land use and circulation modifications associated with the proposed Project would not significantly increase the risk of erosion on- or off-site in the long term, and impacts would be less than significant.

Conclusion

As indicated in the above analysis of near- and long-term conditions, the proposed Project would not result in substantial soil erosion or the loss of topsoil during construction or long-term operation. Accordingly, and consistent with the findings of the OMCPU EIR, impacts would be less

than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

ENERGY CONSERVATION

Would the Project result in the use of excessive amounts of electricity or fuel and other forms of energy (e.g., natural gas, oil)?

OMCPU EIR

The OMCPU EIR found that construction of future projects associated with implementation of the OMCPU would not result in the use of excessive amounts of fuel or other forms of energy and construction-related impacts would be less than significant. In addition, the OMCPU EIR found that implementation of the OMCPU would not result in the need for new electrical systems or require substantial alteration of existing utilities; therefore, assuming compliance with local and state mandates for energy conservation and OMCPU policies related to energy reduction measures, the OMCPU EIR found that long-term operation impacts associated with energy use would be less than significant.

LUMINA PROJECT

No Substantial Change from Previous Analysis.

Construction-Related Activities

Grading and construction activities associated with the proposed Project would consume energy through the use of heavy equipment, trucks, and worker traffic. Construction activities associated with the Project would be similar to what was assumed by the OMCPU EIR. In fact, the Project proposes less development than was assumed by the OMCPU EIR, and therefore would result in a concomitant reduction in construction-related energy consumption. There are no components of the Project's construction phase that would result in a demand for energy that exceeds what is typically required for new development. As such, construction of the proposed Project would not result in the use of excessive amounts of electricity or fuel or other forms of energy, and impacts would be less than significant.

Long-Term Operational Activities

As part of future building permit applications, the Project would be required to meet mandatory energy standards in accordance with Title 24, Building Energy Standards, of the California Public Resources Code. In addition, future development on site would be required to comply with CVSP Design Standard 2.6-12 and Policies 2.5-4, 2.5-14, 2.5-57 and 2.5-170, which encourage the use of energy efficient lighting, the incorporation of shade structures to reduce solar heat gain, and building design features that maximize natural ventilation to take advantage of natural daylight and prevailing breezes (T&B Planning, 2017). Furthermore, the CVSP includes a slight reduction in building intensity as compared to what was assumed by the OMCPU EIR; thus, energy consumption associated with future buildings on site would be less than was disclosed by the OMCPU EIR.

Additionally, future development on site would result in an increase in consumption of fossil fuels associated with vehicular traffic. However, Addendum No. 408329 to the OMCPU EIR found that buildout of the CVSP, including the Project site, would result in a substantial reduction in traffic as compared to what was evaluated in the OMCPU EIR. Specifically, the OMCPU EIR anticipated that the CVSP area would generate approximately 41,109 average daily external trips, as compared to 36,354 average daily external trips that actually would be associated with the CVSP (a reduction of approximately 11.6%). Because the Project is fully consistent with the CVSP in terms of land use intensity, it can also be concluded that buildout of the proposed Lumina Project also would result in a decrease in the amount of traffic generated by the site as compared to what was evaluated and disclosed by the OMCPU EIR. Furthermore, the Project would be required to comply with Specific Plan policies that are intended to improve walkability (CVSP Policies 2.5-6, 2.5-15, 2.5-17, 2.5-20, and 2.5-22), expand public transit facilities and encourage transit use in the Project area (CVSP Section 2.3.2.1), and encourage bicycle use in the Project area (CVSP Design Standard 2.3-18 and Policy 2.5-20). Adherence to the Specific Plan policies associated with enhancing walkability throughout the Project area would likely reduce the estimated daily vehicle trips, thereby reducing transportation-related fuel consumption.

Conclusion

As indicated in the above analysis of near- and long-term conditions, the proposed Project would not result in the use of excessive amounts of fuel or other forms of energy during construction or long-term operation of the Project. Accordingly, and consistent with the findings of the OMCPU EIR, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

NOISE

Would the Project result in a significant increase in the existing ambient noise level?

OMCPU EIR

The OMCPU EIR noted that the OMCPU area has the potential to expose noise-sensitive uses to noise levels in excess of standards established in the City's General Plan, Noise Abatement and Control Ordinance ("Noise Ordinance"; Section 59.5.0101 et seq. of the City's Municipal Code), and land use compatibility guidelines in the Brown Field Comprehensive Land Use Plan (City of San Diego, 2018). The EIR noted that mandatory compliance with 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. The EIR also imposed Mitigation Framework NOI-1 and NOI-2, which require regulatory compliance to ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, the OMCPU EIR concluded that these impacts cannot be reduced to below a level of significance and therefore concluded that the impacts would remain significant and unavoidable. (City of San Diego, 2014b, pp. 5.10-12 through 5.10-20)

No Substantial Change from Previous Analysis.

Construction-Related Activities

Construction activities associated with the Project would increase ambient noise levels in the vicinity on an intermittent but temporary basis. Noise levels during construction would fluctuate depending on the construction phase, equipment type, and duration of use, distance between the noise source and receptor, and the presence or absence of barriers between the noise source and receptor. Consistent with the findings in the OMCPU EIR, the Project would be subject to compliance with federal, State, and local regulations and policies which would reduce construction-related noise impacts. In addition, the Project would be required to comply with Mitigation Framework NOI-3, which requires that prior to issuance of building permits, site-specific noise analysis of on-site generated noise uses shall be conducted and requires implementation of noise reduction mitigation measures during construction, if necessary. Furthermore, the Project would be required to comply with Mitigation Framework NOI-4, which requires projects that exceed daily construction noise thresholds to use best construction management practices to reduce construction noise levels. Moreover, under existing conditions there are no sensitive noise receptors in the Project area. As such, while the Project has the potential to result in construction-related noise levels that exceed City standards, any such noise would not impact sensitive receptors. Notwithstanding, there is a potential that construction activities on site could occur following occupancy of residential or commercial uses on site, which could result in the exposure of sensitive receptors to excessive construction-related noise. Consistent with the findings in the OMCPU EIR, even with strict adherence to the Mitigation Framework, the Project's construction-related noise impacts would be significant and unavoidable at the Tentative Map level of analysis. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Long-Term Operational Activities

Under long-term operation, the Project would have the potential to exceed the noise significance criteria contained in the Noise Element of the General Plan. However, as a proposed mixed-use community with residential and commercial land uses, the Project's primary potential for creating noise impacts would be associated with Project traffic. As documented in Addendum No. 408329 to the OMCPU EIR, buildout of the CVSP (including the Project site) would result in a reduction in average daily traffic as compared to what was evaluated in the OMCPU EIR, thereby resulting in reduced vehicular-related noise impacts as compared to what was evaluated and disclosed by the OMCPU EIR. Specifically, buildout of the CVSP would result in 36,354 external daily trips, as compared to the 41,109 external daily trips assumed for the CVSP area by the OMCPU EIR. The Project's vehicular trips would be within the traffic assumptions for the overall CVSP area; thus, the Project would generate similar traffic-related noise as the assumptions anticipated in Addendum No. 408329 and would be below the traffic-related noise assumptions anticipated for the CVSP area by the OMCPU EIR.

In regards to on-site land uses, the proposed Project designates development areas for residential uses where traffic-related noise levels would exceed the City's noise level compatibility standards

(i.e., proposed residential uses adjacent to Airway Road and Cactus Road) as reported in the OMCPU EIR and Addendum No. 408329. Typical residential construction in California, conducted in compliance with the California Building Standards Code, provides approximately 10 to 15 dBA of noise reduction from exterior noise sources with windows partially open, and approximately 20 to 25 dBA of noise reduction with windows closed. Thus, as a rule of thumb, where exterior noise levels are below 65-dBA CNEL, interior noise levels for new construction would typically meet the interior 45-dBA CNEL standard for residential uses established in the California Code of Regulations, Title 24.

Additionally, where exterior noise levels are 65 to 70 dBA CNEL, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. As stated in the OMCPU EIR, where exterior noise levels exceed 70 dBA CNEL, residential units would not normally be able to meet the 45-dBA CNEL interior standard through typical construction methods. Thus, the OMCPU EIR stated that noise-sensitive uses located within the 70 dBA CNEL will require acoustical study at the project-level, and may require enhanced design features, such as windows and doors with higher Sound Transition Class (STC) ratings to meet the 45-dBA CNEL criteria. Applicable provisions of OMCPU EIR Mitigation Measures NOI-1 and NOI-2 would apply to the proposed Project, which require acoustical study at the implementing project level to determine appropriate construction materials as needed to achieve the City's interior and exterior noise standards.

Commercial uses proposed by the Project would be compatible with the future noise levels calculated for these areas. The interior noise level criterion for commercial sales and offices is 50 dBA CNEL. The majority of planned commercial land uses in the Project area are located along Airway Road. Noise levels along this roadway would be above 70 dBA CNEL at 100 feet. As noted in the OMCPU EIR, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. Thus, no additional noise reduction measures are needed for the proposed commercial areas on-site beyond those presented in the OMCPU EIR.

Although it is expected that the Project would meet the City's interior and exterior noise standards and that Project traffic-related noise would be reduced in comparison to what was evaluated by the OMCPU EIR, it cannot be determined at the Tentative Map level of analysis whether the Project would result in significant operational noise impacts. Accordingly, and consistent with the findings in the OMCPU EIR, even with strict adherence to the Mitigation Framework the Project's long-term operational noise impacts would be significant and unavoidable at the Tentative Map level of analysis. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Conclusion

Based on the analysis of noise impacts above, there would be no new impacts associated with noise beyond what was analyzed in the OMCPU EIR and Addendum No. 408329. Therefore, the proposed Project would be within the scope of analysis of the OMCPU EIR, and the level of impact (significant and unavoidable) would be similar to that cited in Addendum No. 408329 and would be reduced in comparison to what was disclosed by the OMCPU EIR. Therefore, implementation of the proposed

Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Could the proposed Project allow 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?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would locate noise-sensitive residential uses adjacent to noise-generating commercial and industrial uses, which would result in potentially significant noise impacts. The OMCPU EIR identified mitigation framework NOI-3 to reduce potential impacts, which generally requires the preparation of a site-specific acoustical/noise analysis in accordance with the City Acoustical Report Guidelines and policies contained in the General Plan and OMCPU. The OMCPU EIR concluded that even with implementation of mitigation framework NOI-3, potential impacts would remain significant. As such, impacts related to the generation of noise that exceed City standards were disclosed as a significant and unavoidable impact and a statement of overriding considerations was adopted.

LUMINA PROJECT

No Substantial Change from Previous Analysis. Generation of noise from certain types of land uses in the Project area would cause potential land use incompatibility. Noise levels at the property line that exceed Section 59.5.0401 of the City's Municipal Code are considered potentially significant. Section 59.5.0401 of the City's Noise Ordinance sets the operational exterior noise limit for commercial uses at 65 dBA Leq for daytime hours of 7 a.m. to 7 p.m. and 60 dBA Leq during the noise sensitive nighttime hours of 7 p.m. to 7 a.m. Although commercial uses permitted in the Project's mixed-use planning areas are expected to operate primarily during the daytime and evening hours, there is still a potential that businesses may operate during nighttime or early morning hours and therefore the most restrictive and conservative approach is to apply the 60 dBA Leq nighttime standard at the property lines. Buildout of the Project would result in the collocation of residential and recreational land uses with commercial uses (i.e., within and adjacent to the mixed-use portions of the Project area). Noise associated with commercial activities on site could expose nearby noise-sensitive land uses (i.e., residential units) to noise levels that may exceed the noise level limits specified in the City's Noise Ordinance.

Additionally, the Project would introduce residential and recreational land uses in the northern and southern portions of the site in close proximity to existing or planned off-site light and heavy industrial land uses. The noise levels that have the potential to be generated by off-site industrial uses could expose noise-sensitive land uses within the Project area (i.e., residential units) to noise levels that may exceed noise level limits specified in the City's Noise Ordinance.

The juxtaposition of future land uses within the Project site could result in significant noise impacts to sensitive receptors on-site. This potential was acknowledged by the OMCPU EIR. While the City's applicable 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 Ordinance,

no Project-level site plans are proposed as part of the Project at this time. Without detailed operational data and site plans, which will not be identified until the Project Applicant seeks a NDP and/or building permits, it cannot be determined whether on-site noise levels affecting sensitive receptors (i.e., residential uses) would exceed City standards. As the degree of on-site noise level impacts cannot be determined at the Tentative Map level of analysis, and consistent with the conclusion reached by the OMCPU EIR, on-site noise impacts would be potentially significant.

OMCPU EIR Mitigation Measure NOI- 3 requires a site-specific acoustical/noise analysis to be prepared, and if necessary, requires the identification of site-specific mitigation measures to be implemented to reduce noise impacts. However, and consistent with the conclusions reached by the OMCPU EIR, even with strict adherence to the required mitigation, impacts associated with collocation of residential, commercial, and light/heavy industrial land uses has the potential to remain significant and unavoidable. There are no components of the Project that would worsen the level of impact compared to the potential impacts disclosed in the OMCPU EIR. Accordingly, and consistent with the conclusion reached in the OMCPU EIR, impacts due to collocation residential and commercial/land uses resulting in noise exposure that would exceed the City's Noise Ordinance would be significant and unavoidable. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would not 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. Buildout of the OMPCU would not locate residential uses within the Brown Field contours and noise levels would not exceed 70 Community Noise Equivalent Level (CNEL) at nearby industrial uses, which is the noise level standard established in the Brown Field land use compatibility guidelines. Furthermore, the OMCPU EIR found that the OMPCU would not locate residential uses within the General Abelardo L. Rodriguez International Airport 70 CNEL contour. Therefore, the OMCPU EIR concluded that impacts due to 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 would be less than significant. (City of San Diego, 2014b, pp. 5.10-23 and 5.10-24)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project site is located outside of the 60-65 dB CNEL contour area for both Brown Field and the General Abelardo L. Rodriguez International Airport, which is the noise level standard established in the land use compatibility guidelines. As such, the Project would not be exposed to airport-related noise levels exceeding 60 dB CNEL. (ALUC, 2010, Exhibit III-1) Thus, and consistent with the conclusion reached in the OMCPU EIR, the Project would not 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. Accordingly, and consistent with the conclusion reached in the OMCPU EIR, impacts due to airport-related noise would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

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?

OMCPU EIR

The OMCPU EIR concluded that future construction activities would be required to comply with the recommendations included in project-specific acoustical reports prepared in accordance with City Acoustical Report Guidelines, the General Plan, OMCPU policies, and other regulatory or guidance documents. Additionally, the OMCPU EIR imposed Mitigation Framework NOI-4, which requires compliance with the City's Noise Abatement and Control Ordinance to reduce construction-related noise impacts. The OMCPU EIR also imposed Mitigation Framework LU-2, which requires development projects adjacent to designated MHPA areas to comply with the Land Use Adjacency Guidelines in the MSCP in terms of noise. However, even with strict adherence to the Mitigation Frameworks, impacts due to construction-related noise adversely impacting sensitive receptors and sensitive bird species with the MHPA were found to be significant and unavoidable. (City of San Diego, 2014b, pp. 5.10-24 through 5.10-26)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project conforms to the development area identified in the OMCPU, as amended by the CVSP, and would result in a reduction in overall building area as compared to what was assumed for the site by the OMCPU EIR. As such, it can be reasonably assumed that construction of the proposed Project would result in the same or slightly reduced noise levels as compared to what was disclosed by the OMCPU EIR and the Addendum.

Although construction noise would be localized to discrete locations during construction, businesses, residences, recreational facilities, and noise-sensitive wildlife species using open space areas in and around the Project area could be intermittently exposed to temporary elevated levels of noise throughout the construction period. Specifically, the OMCPU EIR indicated that CAGN occupying habitat in the MHPA could be adversely impacted by temporary construction noise if construction occurs during the breeding season. Therefore, the Project's potential to directly and indirectly affect the CAGN due to construction noise does not represent a new impact. Consistent with the findings of the OMCPU EIR, this is a potentially significant impact to humans and potentially to wildlife (CAGN in particular) due to the potential for high short-term and instantaneous noise levels during peak construction activity.

Due to the potential for high short-term and instantaneous noise levels during peak construction activity at nearby residential properties, the proposed Project and future implementing

development within the Project area would be required to comply with OMCPU EIR Mitigation Framework NOI-4, which requires the preparation of a Construction Noise Mitigation Plan to reduce noise levels associated with construction, and OMCPU Mitigation Framework LU-2, which requires all development projects adjacent to MHPA areas comply with the Land Use Adjacency Guidelines of the MSCP in terms of noise. However, and consistent with the findings of the OMCPU EIR, even with the application of Mitigation Frameworks NOI-4 and LU-2, it cannot be assured that construction noise impacts would be reduced to below a level of significance at the Tentative Map level of analysis. Implementation of the Project would not exacerbate construction-related impacts beyond what was evaluated and disclosed in the OMCPU EIR and Addendum.

With respect to traffic-related noise, and as documented in Addendum No. 408329 to the OMCPU EIR, buildout of the CVSP (including the Project site) would result in a reduction in average daily traffic as compared to what was evaluated in the OMCPU EIR, thereby resulting in reduced vehicular-related noise impacts as compared to what was evaluated and disclosed by the OMCPU EIR. Specifically, buildout of the CVSP would result in 36,354 external daily trips, as compared to the 41,109 external daily trips assumed for the CVSP area by the OMCPU EIR. The Project's vehicular trips would be within the traffic assumptions for the overall CVSP area; thus, the Project would generate similar traffic-related noise as the assumptions anticipated in Addendum No. 408329 and would be below the traffic-related noise assumptions anticipated for the CVSP area by the OMCPU EIR.

Based on the foregoing analysis, the Project would result in temporary construction noise from the proposed neighborhood developments and would contribute to traffic-related noise impacts. Additionally, Project operational activities have the potential to expose MHPA areas to excessive noise levels. While compliance with the Mitigation Frameworks identified in the OMCPU EIR would reduce both near- and long-term noise levels, it cannot be assured at the Tentative Map level of analysis whether noise impacts could be reduced to less-than-significant levels. As such, and consistent with the conclusions reached by the OMCPU EIR, Project noise impacts would be significant and unavoidable. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

PALEONTOLOGICAL RESOURCES

Would the Project allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil bearing potential?

OMCPU EIR

The OMCPU EIR found that the OMCPU area contains geologic structures with moderate and high sensitivity potential for paleontological resources; therefore, implementation of the OMCPU was determined to result in a potentially significant impact to paleontological resources. The OMCPU EIR identified Mitigation Framework PALEO-1 to reduce potential impacts, which generally requires future development projects to monitor for paleontological resources during construction activities and to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. The OMCPU EIR

found that with implementation of Mitigation Framework PALEO-1, program-level impacts related to paleontological resources would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.11-5 through 5.11-9)

LUMINA PROJECT

No Substantial Change from Previous Analysis. In order to evaluate the potential significance of on-site paleontological resources, a site-specific Paleontological Records Search was conducted for the Project by BFSA, the results of which are presented as *Appendix G*. The Paleontological Records Search also included a records search for known paleontological resources located on the Project site. The records search did not reveal any previously recorded fossil localities from within the limits of the Project site. The records search indicated that three fossil localities lay to the northwest within one mile of the Project site. The fossils were located within San Diego Formation and included pholad clam borings, fossil bones of pre-historic horse, the ribs of an extinct sea cow, and other unidentified mammal bones recovered during construction associated with State Route 905 improvements. (BFSA, 2018c, p. 2)

The Paleontological Records Search identified the Project site as containing Lindavista Formation, which is assigned a "moderate paleontological sensitivity"; San Diego Formation, which is assigned a "high paleontological sensitivity"; and Otay Formation, which is also assigned a "high paleontological sensitivity." The paleontological sensitivity assignments are indicative of the likelihood of potentially yielding significant nonrenewable paleontological resources during any trenching, excavation, and/or mass grading activities in the formational sediments. Excavations associated with Project construction would encroach into the sensitive soils found on the Project site. Therefore, ground-disturbing construction activities associated with the Project would have the potential to result in significant impacts to paleontological resources that may be buried beneath the surface. (BFSA, 2018c, pp. 1-3)

However, in accordance with OMCPU EIR Mitigation Framework PALEO-1, the Project would be subject to Project-specific Mitigation Measure MM-29 (refer to Section VI. of this EIR Addendum), which requires monitoring for paleontological resources during construction activities in "high" paleontologically sensitive areas and implementation of a Paleontological Mitigation, Monitoring and Reporting Program. Mandatory compliance with Mitigation Measure MM-29 would ensure that Project-related construction activities do not adversely affect paleontological resources and would provide adequate mitigation for the potential loss of paleontological resources. Accordingly, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impact to paleontological resources. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

TRANSPORTATION/CIRCULATION

Would the Project result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would result in significant impacts to roadway segments, intersections, and SR-905 freeway segments and metered freeway on-ramps. The OMCPU EIR concluded that implementation of the OMCPU would result in significant and unmitigated impacts to 24 roadway segments. The OMCPU EIR identified Mitigation Framework TRF-1 to reduce impacts to 49 intersections, which generally requires intersections to be improved in accordance with the intersection lane designations identified Figure 5.12-4 of the OMCPU EIR; however, the OMCPU EIR found that 39 of the 49 intersections would remain significantly impacted after mitigation. In addition, the OMCPU EIR found that at the program-level, OMCPU impacts to five SR-905 freeway segments would remain significant and unmitigated. With respect to freeway ramp metering, the OMCPU EIR concluded that due to the uncertainty associated with implementing freeway improvements, limitations on increasing ramp capacity, and uncertainty regarding implementation of Transportation Demand Management measures, five freeway ramp impacts associated with the OMCPU would remain significant and unmitigated at the program-level after implementation of mitigation. As such, the OMCPU EIR disclosed that impacts to roadway segments, intersections, and the SR-905 freeway segments and metered on-ramps were significant and unmitigated and a statement of overriding considerations was adopted. (City of San Diego, 2014b, pp. 5.12-17 through 5.12-48)

LUMINA PROJECT

No Substantial Change from Previous Analysis: In order to evaluate the proposed Project's potential to impact the surrounding circulation network and to determine whether the Project's impacts are within the scope of the OMCPU EIR, a Project-specific Transportation Impact Study (TIS) was prepared by Chen Ryan Associates, dated February 20, 2019, the results of which are presented in *Appendix H*. Refer to *Appendix H* for a discussion of the methodology used to evaluate the Project's potential traffic impacts.

Minimum Level of Service and Thresholds of Significance

Traffic operations of roadway facilities are described using the term "Level of Service" (LOS). LOS is a quantitative measure describing operational conditions within a traffic stream, and the motorist's and/or passengers' perception of operations. A LOS definition generally describes these conditions in terms of such factors as delay, speed, travel time, freedom to maneuver, interruptions in traffic flow, queuing, comfort, and convenience. Six levels are typically defined ranging from LOS A, representing completely free-flow conditions, to LOS F, representing breakdown in flow resulting in stop-and-go conditions. LOS E represents operations at or near capacity, an unstable level where vehicles are operating with the minimum spacing for maintaining uniform flow. (Chen Ryan, 2019, p. 9)

The definition of an intersection deficiency, roadway deficiency, freeway metered on-ramp deficiency, and freeway segment deficiency has been obtained from the City of San Diego Traffic Impact Study Manual, City of Chula Vista, and Caltrans Guide for the Preparation of Traffic Impact Studies. The City of San Diego Traffic Impact Study Manual states that LOS D is considered acceptable for circulation element roadways within the City. The City of Chula Vista General Plan states that LOS C is considered acceptable for Circulation Element roadway segments within the City of Chula Vista. One of the roadway segments studied as part of the TIS is located within the City of Chula Vista's Otay Subregional Plan, which states that LOS D is considered acceptable for roadways within the Otay Ranch Villages. All roadways were analyzed using City of San Diego LOS Standards, with the exception of Heritage Road, between Main Street and Avenida De Las Vistas, which was analyzed using City of Chula Vista LOS Standards. Caltrans and the SANDAG Regional Growth Management Strategy state that LOS D or better is considered acceptable for freeway operations. The City of San Diego Traffic Impact Study Manual states that delays of less than 15 minutes are considered acceptable for freeway metered on-ramp delays. (Chen Ryan, 2019, pp. 9-17)

Existing Conditions

The study area for the Lumina Project includes a total of 24 existing and future intersections, as shown on Figure 8, *Existing Roadway Network*, where the Project is anticipated to contribute 50 or more peak hour trips. Figure 9, *Existing Intersection Geometrics and Intersection Controls*, illustrates the study area intersections located near the Project and identifies the intersection geometrics and intersection traffic controls. Refer to Section 4.0 of the Project's TIS (*Appendix H*) for a description of ultimate circulation improvements per the General Plans for City of San Diego and the City of Chula Vista.

Existing Traffic Counts

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions using traffic count data collected in October 2015 for the analysis of the CVSP Transportation Facilities Trigger Analysis (TFTA), while schools were in session. The existing peak hour intersection volumes are shown on Figure 10, *Existing AM/PM Peak Hour Intersection Volumes*. The following peak hours were selected for analysis: (Chen Ryan, 2019, p. 41)

- Weekday AM Peak Hour (peak hour between 7:00 AM and 9:00 AM)
- Weekday PM Peak Hour (peak hour between 4:00 PM and 6:00 PM)

The weekday AM and weekday PM peak hour count data are representative of typical weekday peak hour traffic conditions in the study area, which are based on the traffic conditions in October 2015.

Existing Conditions Intersection Level of Service

Existing peak hour traffic LOS have been evaluated for the study area intersections based on the methodologies presented in Section 2.3 of the Project's TIS (*Appendix H*). The intersection LOS results are summarized in Table 8, *Peak Hour Intersection Level of Service for Existing Conditions*, which indicates all of the study area intersections are currently operating at an acceptable LOS during the peak hours. The intersection LOS calculation worksheets are included in Appendix D of the Project's TIS. (Chen Ryan, 2019, p. 46)

Table 8 Peak Hour Intersection Level of Service for Existing Conditions

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS
1	Caliente Avenue / SR-905 WB Ramps	Signalized	5.8	A	8.7	A
2	Caliente Avenue / SR-905 EB Ramps	Signalized	16.2	B	14.3	B
3	Caliente Avenue / Airway Road	AWSC	7.8	A	8.7	A
4	Innovative Drive / Otay Mesa Road	SSSC	9.1	A	10.6	B
5	Heritage Road / Otay Mesa Road	Signalized	17.9	B	21.5	C
6	Cactus Road / Otay Mesa Road	Signalized	11.4	B	15.5	B
7	Cactus Road / Airway Road	SSSC	9.4	A	9.6	A
8	Britannia Boulevard / Otay Mesa Road	Signalized	11.4	B	20.4	C
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	11.6	B	14.0	B
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	9.9	A	13.2	B
11	Britannia Boulevard / Airway Road	Signalized	16.0	B	41.2	D
12	Saint Andrews Avenue / Otay Mesa Road	Signalized	6.3	A	6.9	A
13	La Media Road / Otay Mesa Road	Signalized	52.8	D	52.0	D
14	La Media Road / Airway Road	AWSC[1]	16.2	C	12.6	B
15	Harvest Road / Airway Road	AWSC	8.9	A	9.9	A
16	Village Way / Airway Road	Does Not Exist				
17	Cactus Road / Street "D"	Does Not Exist				
18	Cactus Road / Central Main Street	Does Not Exist				
19	Cactus Road / Street "C"	Does Not Exist				
20	Cactus Road / Siempre Viva Road	Buildout Conditions Only				
21	Britannia Boulevard / Siempre Viva Road	Buildout Conditions Only				
22	La Media Road / Siempre Viva Road	Buildout Conditions Only				
23	Heritage Road / Avenida De Las Vistas	Buildout Conditions Only				
24	Heritage Road / Datsun Street	Buildout Conditions Only				

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
AWSC = All-Way Stop Controlled.
SSSC = Side-Street Stop Controlled, the delay shown is the worst delay experienced by any of the approaches.
[1] A traffic signal is in place at this intersection, however, it is not in operations. Therefore, it is analyzed as an all-way stop controlled intersection.
(Chen Ryan, 2019, Table 4.2)

Existing Conditions Roadway Segment Level of Service

Existing traffic LOS has been evaluated for the study area roadway segments based on the methodologies presented in Section 2.2 of the Project's TIS (*Appendix H*). The roadway segment LOS results are summarized in Table 9, *Roadway Segment Level of Service for Existing Conditions*, which indicates that the following study area roadway segment is currently operating at an unacceptable LOS (i.e., LOS E or worse). Consistent with Table 9existing daily roadway segment volumes are shown on Figure 11, *Existing Roadway Segment Volumes*. (Chen Ryan, 2019, p. 41)

- Airway Road, between La Media Road and Avenida Costa Azul – LOS E

Existing Conditions Ramp Metering Delay

Ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results are not included in this scenario and are only included in the Buildout of Community Plan plus Project (Full Development) scenario. (Chen Ryan, 2019, p. 13)

Existing Conditions Freeway Segment Level of Service

Existing traffic LOS has been evaluated for the study area freeway segments based on the methodologies presented in Section 2.5 of the Project's TIS (*Appendix H*). The freeway segment LOS results are summarized in Table 10, *Freeway Segment Level of Service for Existing Conditions*, which indicates all of the study area freeway segments are currently operating at an acceptable LOS during the peak hours. (Chen Ryan, 2019, p. 47)

Projected Future Traffic

Proposed Project

Trip generation represents the amount of traffic that is attracted and produced by a development, and is based upon the specific land uses planned for a given project. In order to develop the expected vehicular trip generation of the proposed Project, trip-generation rates published in the City of San Diego Land Development Code – Trip Generation Manual, May 2003 were generally used. Trip generation rates for the Project during both Phase 1 (2023) and Phase 2 (Full Development 2027) are shown in Table 11, *Project Trip Generation Summary*.

Under Phase 1 (2023) development, the proposed Project is anticipated to generate a total of 11,151 average daily trips (ADT), including 673 AM peak hour trips (187 in, 486 out) and 1,048 PM peak hour trips (646 in, 402 out). Under Phase 2 Full Development (2027), which includes development of Phase 1 of the Project, the Project would be expected to generate a total of 17,198 ADT, including 1,340 AM peak hour trips (431 in, 909 out) and 1,691 PM peak hour trips (1,042 in, 649 out). The same SANDAG Select Zone Assignment that was conducted for the approved CVSP TFTA was utilized for the analysis of the proposed Project. The SANDAG Select Zone Assignment estimated the percent of trips that will be internally captured. The Select Zone Assignment for the CVSP estimated that 9.4% of daily trips would be internally captured within the proposed Project area, resulting in 90.6% of the project traffic leaving the project site for distribution onto the external (i.e., off-site) roadways. Therefore, applying the calculated internal capture from the SANDAG Select Zone Assignment to

Table 9 Roadway Segment Level of Service for Existing Conditions

Roadway	From	To	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	V/C	LOS
Ocean View Hills Parkway	Starfish Way	Del Sol Boulevard	4-Ln Major Arterial	4-Ln w / RM	11,269	40,000	0.282	A
	Del Sol Boulevard	Otay Mesa Road	6-Ln Major Arterial	6-Ln w / RM	8,238	50,000	0.165	A
Caliente Avenue	SR-905 WB Ramps	SR-905 EB Ramps	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	10,669	50,000[1]	0.213	A
	SR-905 EB Ramps	Airway Road	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	4,360	50,000[1]	0.087	A
Cactus Road	SR-905	Street "D"	2-Ln Collector w/ Commercial Fronting	2-Ln	2,076	8,000	0.260	A
	Street "D"	Airway Road	2-Ln Collector w/ Commercial Fronting	2-Ln	2,076	8,000	0.260	A
	Airway Road	Central Main Street	2-Ln Collector w/ Commercial Fronting	2-Ln	2,076	8,000	0.260	A
	Central Main Street	Street "C"	2-Ln Collector w/ Commercial Fronting	2-Ln	2,076	8,000	0.260	A
	Street "C"	Siempre Viva Road	2-Ln Collector w/ Commercial Fronting	2-Ln	2,076	8,000	0.260	A
Britannia Boulevard	Otay Mesa Road	SR-905 WB Ramps	6-Ln Prime Arterial	6-Ln w/ RM	12,258	60,000	0.204	A
	SR-905 WB Ramps	SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w/ RM	20,994	60,000	0.350	A
	SR-905 EB Ramps	Airway Road	5-Ln Prime Arterial	5-Ln w/ RM (2-NB, 3-SB)	22,969	50,000[1]	0.459	B
	Airway Road	Siempre Viva Road	4-Ln Major Arterial	4-Ln w/ RM	11,558	40,000	0.289	A

Table 9 Roadway Segment Level of Service for Existing Conditions (Cont'd)

Roadway	From	To	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	V/C	LOS
Harvest Road	Airway Road	Otay Center Drive	2-Ln w/ Commercial Fronting	2-Ln	4,056	8,000	0.507	C
Otay Center Drive	Harvest Road	Siempre Viva Road	4-Ln Collector	4-Ln	900	15,000	0.060	A
Otay Mesa Road	Ocean View Hills Parkway	Corporate Center Drive	6-Ln Prime Arterial	6-Ln w / RM	15,058	60,000	0.251	A
	Corporate Center Drive	Heritage Road	6-Ln Prime Arterial	6-Ln w / RM	9,565	60,000	0.159	A
	Heritage Road	Cactus Road	6-Ln Prime Arterial	6-Ln w / RM	8,205	60,000	0.137	A
	Cactus Road	Britannia Boulevard	6-Ln Prime Arterial	6-Ln w / RM	9,802	60,000	0.163	A
	Britannia Boulevard	Saint Andrews Avenue	6-Ln Prime Arterial	6-Ln w / RM	10,642	60,000	0.177	A
	Saint Andrews Avenue	La Media Road	6-Ln Prime Arterial	6-Ln w / RM	8,690	60,000	0.145	A
	La Media Road	Piper Ranch Road	6-Ln Prime Arterial	6-Ln w / RM	16,924	60,000	0.282	A
Airway Road	Old Otay Mesa Road	Caliente Avenue	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w / CLTL	3,919	30,000	0.131	A
	Cactus Road	Britannia Boulevard	2-Ln Collector w/ Commercial Fronting	2-Ln	2,232	8,000	0.279	A
	Britannia Boulevard	1,600 feet west of La Media Road	2-Ln Collector w/ Commercial Fronting	2-Ln	2,927	8,000	0.366	B
	1,600 feet west of La Media Road	La Media Road	2-Ln Collector w/ Commercial Fronting	2-Ln	2,927	8,000	0.366	B
	La Media Road	Avenida Costa Azul	2-Ln Collector w/ Commercial Fronting	2-Ln	6,839	8,000	0.855	**E**

Table 9 Roadway Segment Level of Service for Existing Conditions (Cont'd)

Roadway	From	To	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	V/C	LOS
Airway Road	Avenida Costa Azul	Piper Ranch Road	4-Ln Major Arterial	4-Ln w / RM	6,839	40,000	0.171	A
	Piper Ranch Road	Harvest Road	2-Ln w/ Continuous-Left-Turn-Lane	2-Ln w / CLTL	5,590	15,000	0.373	B
Siempre Viva Road	Cactus Road	Britannia Blvd	2-Ln Collector w/ Commercial Fronting	2-Ln	2,142	8,000	0.268	A

Source: AVC, Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
RM = Raised Median.
SM = Striped Median.
CLTL = Continuous-Left-Turn Lane.
[1] Based on the capacity of a 6-Ln Prime Arterial, reduced to exclude a lane. (5/6*60,000 = 50,000).
(Chen Ryan, 2019, Table 4.1)

Table 10 Freeway Segment Level of Service for Existing Conditions

Freeway	Segment	ADT[a]	Direction	# of Lanes	Capacity[b]	D[c]	K[d]	HVF[e]	Peak Hour Volume	V/C	LOS[f]	Peak Hour
SR-905	I-805 and Caliente Avenue	82,000	EB	4M	9,400	66.2%	7.6%	11.9%	4,400	0.470	B	AM
			WB	3M+1A	8,460	58.8%	9.0%	11.9%	4,600	0.540	B	PM
	Caliente Avenue and Heritage Road	73,000	EB	3M	7,050	66.2%	7.6%	11.9%	1,900	0.270	A	AM
			WB	3M	7,050	58.8%	9.0%	11.9%	1,300	0.180	A	PM
	Heritage Road and Britannia Boulevard	73,000	EB	3M	7,050	66.2%	7.6%	11.9%	900	0.130	A	AM
			WB	3M	7,050	58.8%	9.0%	11.9%	800	0.110	A	PM

Source: AVC, Chen Ryan Associates; February 2019

Notes:
Bold letter indicated substandard LOS.
M = Mainline. A = Auxiliary Lane.
[a] Traffic volumes provided by Caltrans (2017).
[b] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[c] D = Directional split.| [d] K = Peak hour %. | [e] HV = Heavy vehicle % - consistent with the OMCPU. | [f] LOS during highest directional demand.
(Chen Ryan, 2019, Table 4.3)

Table 11 Project Trip Generation Summary

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Phase 1 (Year 2023)													
Multi-Family (Over 20 DU/acre)	1,129 DU	6	6,774	8%	542	2:8	108	434	9%	610	7:3	427	183
Community Commercial [a]	62.53 KSF	70[a]	4,377	3%	131	6:4	79	52	10%	438	5:5	219	219
Phase 1 Total			**11,151**	-	**673**	-	**187**	**486**	-	**1,048**	-	**646**	**402**
Phase 2 (Year 2027)													
Multi-Family (Over 20 DU/acre)	526 DU	6	3,156	8%	252	2:8	51	201	9%	284	7:3	199	85
Multi-Family (Under 20 DU/acre)	213 DU	8	1,704	8%	136	2:8	27	109	10%	170	7:3	119	51
Park (Developed)	6.6 Acres	50	330	4%	13	5:5	7	6	8%	26	5:5	13	13
Elementary School	6.3 Acres*	136	857	31%	266	6:4	159	107	19%	163	4:6	65	98
Phase 2 Total			**6,047**	-	**667**	-	**244**	**423**	-	**643**	-	**396**	**247**
Full Development Total			**17,198**		**1,340**		**431**	**909**		**1,691**		**1,042**	**649**
Internal Trips Capture (9.4%)[b]			**1,617**		**126**		**41**	**85**		**159**		**98**	**61**
External Trips			**15,581**		**1,214**		**390**	**824**		**1,532**		**944**	**588**

Source: Colrich, December 2017; City of San Diego Land Development Code – Trip Generation Manual, May 2003

Notes:
* 6.3 acres represents the ColRich portion of the elementary school and the entire school site is estimated to be 13.1 acres.
[a] – Trip generation rate used is consistent with the Otay Mesa CPU & OMCVSP.
[b] – Internal capture consistent with Otay Mesa Central Village Specific Plan.

(Chen Ryan, 2019, Table 3.1)

Phase 2 Full Development (2027) trip generation, the proposed Project is anticipated to generate a total of 15,581 external daily trips, including 1,214 AM peak hour trips (390 in, 824 out) and 1,532 PM peak hour trips (944 in, 588 out). (Chen Ryan, 2019, p. 52)

Project Trip Generation Comparison to OMCPU

The Project would be developed in accordance with the land uses assumed for the site by the CVSP. Implementation of the CVSP proposed 283 fewer multi-family dwelling units; an increase of 107,000 s.f. of community commercial space; and a reduction of 2.06 acres of active park space as compared to the land uses assumed for the CVSP area by the OMCPU EIR. Addendum No. 408329 to the OMCPU EIR prepared for the CVSP found that the CVSP (including the Project site) would result in a 7% reduction

in daily trips as compared to the number of trips disclosed in the OMCPU EIR. Thus, because the Project would be developed in accordance with the land uses for the site as detailed in the CVSP, the Project would result in reduced traffic as compared to what was assumed for the site by the OMCPU

EIR. As such, all expected Project-related traffic impacts as discussed herein would be less than was evaluated by the OMCPU EIR.

Project Trip Distribution

Project trip distribution was determined based on adjacent land uses and the existing transportation network. Trip distribution is identical during the following scenarios: (Chen Ryan, 2019, p. 25)

- Existing plus Project – Full Development (Phases 1 & 2);
- Near-Term Year 2023 plus Project (Phase 1); and
- Near-Term Year 2027 plus Project – Full Development (Phases 1 & 2).

However, under Buildout of Community Plan conditions, the same project trip distribution utilized for the CVSP TFTA was employed. Figure 12, *Existing and Near-Term (2023 and 2027) Trip Distribution*, displays the external project trip distribution patterns associated with the proposed Project under Existing plus Project – Full Development (Phases 1 & 2), Near-Term Year 2023 plus Project – Phase 1, and Near-Term Year 2027 plus Project – Full Development (Phases 1 & 2). Figure 13, *Buildout of Community Plan Conditions Project Trip Distribution*, displays the external project trip distribution patterns associated with the proposed project under Buildout of Community Plan plus Project (Full Development). (Chen Ryan, 2019, p. 25)

Project Trip Assignment

Based upon the Project trip distribution patterns, the external daily and AM/PM peak hour Project trips were assigned to the study area roadway networks. Figure 14, *Project Only Traffic (Phase 1) – Near-Term 2023 Roadway Network*, and Figure 15, *Project Only Traffic (Phase 1) – Near-Term 2023 Trip Assignment*, display the assignment of Project trips to the roadway network and key study area intersections, respectively under Phase 1, while Figure 16, *Project Only Traffic (Full Development) – Existing and Near-Term 20271 Roadway Network*, and Figure 17, *Project Only Traffic (Full Development) – Existing and Near-Term 2027 Trip Assignment*, display the assignment of project trips to the roadway network and key study area intersections, respectively under full development of the proposed Project. Figure 18, *Project Only Traffic (Full Development) – Buildout of Community Plan Roadway Network*, and Figure 19, *Project Only Traffic (Full Development) – Buildout of Community Plan Trip Assignment*, display the assignment of project trips to the roadway network and key study area intersections, respectively under Buildout of the Community Plan. (Chen Ryan, 2019, pp. 25-26)

Cumulative Development

The CEQA guidelines require that other reasonably foreseeable projects in the study area also be included as part of a cumulative analysis scenario. Two cumulative project lists were developed for the purposes of this analysis through consultation with planning and engineering staff from the City of San Diego. The two cumulative project lists include known and foreseeable projects that are anticipated to contribute traffic to the study area intersections under Phase 1 (2023) and Phase 2 Full Development (2027) conditions. (Chen Ryan, 2019, pp. 67, 102)

For the purposes of this analysis, the cumulative projects that were determined to affect one or more of the study area intersections for Phase 1 (2023) development are listed in Table 12, *Phase 1 (2023) Cumulative Projects Trip Generation*, and shown on Figure 20, *Phase 1 (2023) Cumulative Projects Locations Map,* and were considered as near-term reasonably foreseeable projects. Cumulative projects that that were determined to affect one or more of the study area intersections for Phase 2 Full Buildout (2027) development are listed in Table 13, *Phase 2 Full Development (2027) Cumulative Projects Trip Generation* and were shown previously on Figure 20, and were considered as near-term reasonably foreseeable projects. (Chen Ryan, 2019, pp. 67, 102)

Two projects included in the Phase 1 (2023) list have additional phases under the Phase 2 Full Buildout (2027) scenario. The following phases were included in Table 12 for Phase 1 (2023) cumulative projects.

12. Cross Border Facility Project Phase 2 (2017) – A 45,000 square feet cross border facility, a 170-room hotel, a gas station with 12 fuel dispensers, a convenience store and a car wash, and 20,000 square feet of specialty retail land use.

13. Metro Airpark Phase 1 (2022) – A project that consists of general aviation facilities that will allow for 163 additional flights per day, 18,880 square feet of commercial office uses, and 1,500 square feet of high turnover restaurant uses.

The Phase 2 Full Buildout (2027) cumulative project list includes all of the projects included in the Phase 1 (2023) list and includes two cumulative projects that have additional phases. The following additional phases were included in Table 13 for Phase 2 Full Buildout (2027) cumulative projects: (Chen Ryan, 2019, p. 102)

12. Cross Border Facility Project - Full Buildout (2026) – A 95,000 square feet cross border facility, a 340-room hotel, 6,000 square feet of sit down restaurant, a gas station with 12 fuel dispensers, a convenience store and a car wash, 34,000 square feet of specialty retail land use, and 402,000 square feet of Industrial/Business Park uses."

13. Metro Airpark Phase 2 (2027) – A project that consists of general aviation facilities that will allow for 64 additional flights per day over Phase 1, 110,482 square feet of commercial office uses, 2,500 square feet of high turnover restaurant uses, 0.74 acres of Transit Transfer Station, a 150-room hotel, 647,600 square feet of Large Industrial Park uses, 707,400 square feet of Industrial/Business Park uses, 3,225 square feet of gasoline station w/ mini mart uses, and 66.50 acres of solar field uses.

Existing Plus Project (E+P) Conditions

This subsection provides an analysis of existing traffic conditions with the addition of Project trips from full development of the proposed Project. Under this scenario, the proposed Project's buildout traffic volumes are added to the existing traffic volumes and roadway configuration, and impacts are assessed. The analysis of the Project's potential impacts as measured against the existing conditions baseline that follows is presented for information purposes only. The identification of the Project's significant impacts, with recommended mitigation, will instead be based on the future year analyses that take into account cumulative traffic growth, as well as the changing roadway network and land

Table 12 Phase 1 (2023) Cumulative Projects Trip Generation

Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
1. 7-Eleven [1] (NW corner of Ocean View Hills Parkway/Caliente Avenue and Otay Mesa Road)	Convenience Store	1,800	144 (72-in / 72-out)	144 (72-in / 72-out)
2. Azul Playa Del Sol/Luna (California Terraces PA 6) [2]	Residential	4,440	356 (71-in / 285-out)	400 (280-in / 120-out)
3. Cesar Solis Park [3]	Park	750	30 (0-in / 30-out)	60 (0-in / 60-out)
4. Candlelight [4]	Residential	2,850	228 (46-in / 182-out)	257 (180-in / 77-out)
5. Southview [5]	Residential	1,662	133 (27-in / 106-out)	299 (105-in / 194-out)
6. Southview East [6]	Residential	816	65 (13-in / 52-out)	220 (51-in / 169-out)
7. Southwind [7]	Residential	800	64 (13-in / 51-out)	80 (56-in / 24-out)
8. Handler Retail Center [6]	Motel	1,701	136 (54-in / 82-out)	153 (61-in / 92-out)
	Restaurant (sit down high turnover)	3,120	250 (125-in / 125-out)	250 (150-in / 100-out)
	Fast food (with drive-through)	4,200	168 (101-in / 67-out)	336 (168-in / 168-out)
9. Arco #5770 [9] (1625 Heritage Road)	Gas Station	60	4 (2-in / 2-out)	4 (2-in / 2-out)

Table 12 Phase 1 (2023) Cumulative Projects Trip Generation (Cont'd)

Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
10. Marijuana Production Facility [10] (Innovative Drive)	Marijuana Facility	346	69 (62-in / 7-out)	69 (14-in / 55-out)
11. California Terraces PA 61 [11]	Mixed-use Residential/Commercial	4,716	252 (101-in / 151-out)	486 (271-in / 215-out)
12. Cross Border Facility (Phase 2) [12]	Cross Border Facility	24,700	1,056 (606-in / 450-out)	1,167 (587-in / 580-out)
13. Metro Airpark (Phase 1) [13]	Airport / Retail	1,000	99 (77-in / 22-out)	106 (34-in / 72-out)
14. Plaza La Media (Full Buildout) [14]	Commercial/Retail	8,660	310 (183-in / 127-out)	812 (407-in / 405-out)
15. Sunroad Otay Mesa (Phase 1 and Phase 2) [15]	Warehouse	4,225	633 (444-in / 189-out)	676 (270-in / 406-out)
Cumulative Total		**65,846**	**3,997 (1,997-in / 2,000-out)**	**5,519 (2,708-in / 2,811-out)**

Source: Chen Ryan Associates, February 2019.

Notes:
[1] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[2] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[3] Trip Generation obtained from *City of San Diego Land Development Code – Trip Generation Manual, May 2003*
[4] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[5] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[6] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[7] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[8] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[9] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[10] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[11] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[12] Trip Generation obtained from *Cross Border Facility TIS* prepared by LSA Associates. June 2011.
[13] Trip Generation obtained from *Metro Airpark TIS* prepared by Rick Engineering. April 2012.
[14] Trip Generation obtained from draft *Plaza La Media TIS* prepared by STC. August 2017.
[15] Trip Generation obtained from *Sunroad Otay Mesa TIS* prepared by Kimley-Horn. February 2017.
(Chen Ryan, 2019, Table 6.1)

Table 13 Phase 2 Full Development (2027) Cumulative Projects Trip Generation

Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
1. 7-Eleven [1] (NW corner of Ocean View Hills Parkway/Caliente Avenue and Otay Mesa Road)	Convenience Store	1,800	144 (72-in / 72-out)	144 (72-in / 72-out)
2. Azul Playa Del Sol/Luna (California Terraces PA 6) [2]	Residential	4,440	356 (71-in / 285-out)	400 (280-in / 120-out)
3. Cesar Solis Park [3]	Park	750	30 (0-in / 30-out)	60 (0-in / 60-out)
4. Candlelight [4]	Residential	2,850	228 (46-in / 182-out)	257 (180-in / 77-out)
5. Southview [5]	Residential	1,662	133 (27-in / 106-out)	299 (105-in / 194-out)
6. Southview East [6]	Residential	816	65 (13-in / 52-out)	220 (51-in / 169-out)
7. Southwind [7]	Residential	800	64 (13-in / 51-out)	80 (56-in / 24-out)
8. Handler Retail Center [6]	Motel	1,701	136 (54-in / 82-out)	153 (61-in / 92-out)
	Restaurant (sit down high turnover)	3,120	250 (125-in / 125-out)	250 (150-in / 100-out)
	Fast food (with drive-through)	4,200	168 (101-in / 67-out)	336 (168-in / 168-out)
9. Arco #5770 [9] (1625 Heritage Road)	Gas Station	60	4 (2-in / 2-out)	4 (2-in / 2-out)
10. Marijuana Production Facility [10] (Innovative Drive)	Marijuana Facility	346	69 (62-in / 7-out)	69 (14-in / 55-out)

Table 13 Phase 2 Full Development (2027) Cumulative Projects Trip Generation (Cont'd)

Cumulative Project	Land Use	Daily Trips	AM Peak Hour (In / Out)	PM Peak Hour (In / Out)
11. California Terraces PA 61 [11]	Mixed-use Residential/Commercial	4,716	252 (101-in / 151-out)	486 (271-in / 215-out)
12. Cross Border Facility (Full Buildout) [12]	Cross Border Facility	46,700	2,313 (1,505-in / 808-out)	2,547 (1,115-in / 1,431-out)
13. Metro Airpark (Phases 1 & 2) [13]	Airport / Retail	24,760	2,695 (2,116-in / 579-out)	2,780 (710-in / 2,070-out)
14. Plaza La Media (Full Buildout) [14]	Commercial/Retail	8,660	310 (183-in / 127-out)	812 (407-in / 405-out)
15. Sunroad Otay Mesa (Phase 1 and Phase 2) [15]	Warehouse	4,225	633 (444-in / 189-out)	676 (270-in / 406-out)
Cumulative Total		**111,606**	**7,850 (4,935-in / 2,915-out)**	**9,573 (3,912-in / 5,660-out)**

Source: Chen Ryan Associates, February 2019.

Notes:
[1] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[2] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[3] Trip Generation obtained from *City of San Diego Land Development Code – Trip Generation Manual, May 2003*
[4] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[5] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[6] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[7] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[8] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[9] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[10] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[11] Trip Generation obtained from *California Terraces PA 61 TIS* prepared by LOS Engineering, Inc. January 14, 2019.
[12] Trip Generation obtained from *Cross Border Facility TIS* prepared by LSA Associates. June 2011.
[13] Trip Generation obtained from *Metro Airpark TIS* prepared by Rick Engineering. April 2012.
[14] Trip Generation obtained from draft *Plaza La Media TIS* prepared by STC. August 2017.
[15] Trip Generation obtained from *Sunroad Otay Mesa TIS* prepared by Kimley-Horn. February 2017.
(Chen Ryan, 2019, Table 8.1)

uses that accompany a long-range development project such as the proposed Project. This methodology is appropriate for the proposed Project because the Project would not produce any traffic until buildout and occupancy of the first phase of development in 2023, and no traffic would be produced by the Project prior to 2023. (Chen Ryan, 2019, p. 77)

Roadway Improvements E+P Conditions

The lane configurations and traffic controls assumed to be in place for E+P conditions are largely identical with those shown previously on Figure 8 and Figure 9, except that it is assumed that Project driveways and those facilities constructed by the Project to provide site access are also assumed to be in place for E+P conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). (Chen Ryan, 2019, pp. 77-78)

E+P Traffic Volume Forecasts

This scenario includes Existing traffic volumes plus Project traffic. Figure 5-3 of the Project's TIS (*Appendix H*) shows the ADT volumes and TIS Figure 5-4 shows the peak hour intersection turning movement volumes that can be expected for E+P traffic conditions. (Chen Ryan, 2019, p. 51)

Intersection Level of Service – E+P Traffic Conditions

E+P peak hour traffic LOS has been evaluated for the study area intersections based on the methodologies presented in Section 2.2 of the Project's TIS (*Appendix H*). The intersection LOS results are summarized in Table 14, *Intersection Level of Service for E+P Conditions*, which indicate that the following intersection is anticipated to operate at an unacceptable LOS with the addition of Project traffic under Existing Plus Project conditions. The intersection LOS calculation worksheets are included in Appendix E of the Project's TIS. (Chen Ryan, 2019, pp. 60-61)

- Britannia Boulevard/ Airway Road (Intersection #11) – LOS E in the AM and PM peak hours.

Roadway Segment Level of Service – E+P Traffic Conditions

E+P roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Section 2.3 of the Project's TIS (*Appendix H*). The roadway segment LOS results are summarized in Table 15, *Roadway Segment Level of Service for E+P Conditions,* which indicate that the following roadway segments are anticipated to operate at an unacceptable LOS with the addition of Project traffic under Existing Plus Project conditions. (Chen Ryan, 2019, pp. 56-60)

- Airway Road, between Cactus Road and Britannia Boulevard – LOS F; and
- Airway Road, between La Media Road and Avenida Costa Azul – LOS F.

Ramp Metering Delay – E+P Traffic Conditions

Ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results are not included in this scenario and are only included in the Buildout of Community Plan plus Project (Full Development) scenario. (Chen Ryan, 2019, p. 13)

Freeway Segment Level of Service – E+P Conditions

E+P traffic LOS has been evaluated for the study area freeway segments based on the methodologies presented in Section 2.5 of the Project's TIS (*Appendix H*). The freeway segment LOS

Table 14 Intersection Level of Service for E+P Conditions

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Caliente Avenue / SR-905 WB Ramps	Signalized	7.7	A	9.5	A	5.8 / 8.7	A / A	1.9 / 0.8	No
2	Caliente Avenue / SR-905 EB Ramps	Signalized	16.2	C	14.3	B	16.2 / 14.3	B / B	0.0 / 0.0	No
3	Caliente Avenue / Airway Road	AWSC	8.4	A	9.7	A	7.8 / 8.7	A / A	0.6 / 1.0	No
4	Innovative Drive / Otay Mesa Road	SSSC	9.3	A	11.1	B	9.1 / 10.6	A / B	0.2 / 0.5	No
5	Heritage Road / Otay Mesa Road	Signalized	18.1	B	24.2	C	17.9 / 21.5	B / C	0.2 / 2.7	No
6	Cactus Road / Otay Mesa Road	Signalized	19.7	B	18.7	B	11.4 / 15.5	B / B	8.3 / 3.2	No
7	Cactus Road / Airway Road	Signalized	24.9	C	22.1	C	9.4 / 9.6	A / A	15.5 / 12.5	No
8	Britannia Boulevard / Otay Mesa Road	Signalized	16.4	B	33.6	C	11.4 / 20.4	B / C	5.0 / 13.2	No
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	13.9	B	19.1	B	11.6 / 14.0	B / B	2.3 / 5.1	No
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	15.8	B	16.9	B	9.9 / 13.2	A / B	5.9 / 3.7	No
11	Britannia Boulevard / Airway Road	Signalized	68.0	**E**	67.1	**E**	16.0 / 41.2	B / D	52.0 / 25.9	**Yes**
12	Saint Andrews Avenue / Otay Mesa Road	Signalized	7.2	A	8.2	A	6.3 / 6.9	A / A	0.9 / 1.3	No
13	La Media Road / Otay Mesa Road	Signalized	53.4	D	52.3	D	52.8 / 52.0	D / D	0.6 / 0.3	No
14	La Media Road / Airway Road	AWSC[1]	21.3	C	19.0	C	16.2 / 12.6	C / B	5.1 / 6.4	No
15	Harvest Road / Airway Road	AWSC	10.1	B	11.5	B	8.9 / 9.9	A / A	1.2 / 1.6	No
16	Village Way / Airway Road	Signalized	10.1	B	17.9	C	N/A			No
17	Cactus Road / Street "D"	AWSC	7.3	A	7.9	A	N/A			No
18	Cactus Road / Central Main Street	AWSC	9.5	A	10.9	B	N/A			No
19	Cactus Road / Street "C"	AWSC	8.2	A	8.7	A	N/A			No

Table 14 Intersection Level of Service for E+P Conditions (Cont'd)

ID	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
20	Cactus Road / Siempre Viva Road	AWSC	Buildout Conditions Only							
21	Britannia Boulevard / Siempre Viva Road	Signalized	Buildout Conditions Only							
22	La Media Road / Siempre Viva Road	SSSC	Buildout Conditions Only							
23	Heritage Road / Avenida De Las Vistas	AWSC	Buildout Conditions Only							
24	Heritage Road / Datsun Street	AWSC	Buildout Conditions Only							

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicated substandard LOS.
AWSC = All-Way Stop Controlled.
SSSC = Side-Street Stop Controlled, the delay shown is the worst delay experienced by any of the approaches.
N/A = Not analyzed under this scenario.
SI? = Significant Impact?

[1] A traffic signal is in place at this intersection, however, it is not in operations. Therefore, it is analyzed as an all-way stop control intersection.

(Chen Ryan, 2019, Table 5.2)

Table 15 Roadway Segment Level of Service for E+P Conditions

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project			
						V/C	LOS	V/C	LOS	Δ V/C	SI?
Ocean View Hills Parkway	Starfish Way to Del Sol Boulevard	4-Ln Major Arterial	4-Ln w / RM	11,900	40,000	0.298	A	0.282	A	0.016	No
	Del Sol Boulevard to Otay Mesa Road	6-Ln Major Arterial	6-Ln w / RM	9,020	50,000	0.180	A	0.165	A	0.016	No
Caliente Avenue	SR-905 WB Ramps SR-905 EB Ramps	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	11,760	50,000[1]	0.235	A	0.213	A	0.022	No
	SR-905 EB Ramps to Airway Road	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	5,460	50,000[1]	0.109	A	0.087	A	0.022	No
Cactus Road	SR-905 to Street "D"	2-Ln w/ Commercial Fronting	2-Ln	2,080	8,000	0.260	A	0.260	A	0.000	No
	Street "D" to Airway Road	3-Ln Major Arterial	3-Ln w / RM	4,420	30,000[2]	0.147	A	0.260	A	-0.112	No
	Airway Road to Central Main Street	3-Ln Major Arterial	3-Ln w / RM (1NB, 2SB)	8,310	30,000[2]	0.277	A	0.260	A	0.018	No
	Central Main Street to Street "C"	3-Ln Major Arterial	3-Ln w / RM (1NB, 2SB)	5,200	30,000[2]	0.173	A	0.260	A	-0.086	No

Table 15 Roadway Segment Level of Service for E+P Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Cactus Road	Street "C" and Siempre Viva Road	3-Ln Major Arterial	3-Ln w / RM (1NB, 2SB)	2,390	30,000[2]	0.079	A	0.260	A	-0.180	No
Britannia Boulevard	Otay Mesa Road to SR-905 WB Ramps	6-Ln Prime Arterial	6-Ln w / RM	17,560	60,000	0.293	A	0.204	A	0.088	No
	SR-905 WB Ramps to SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w / RM	31,280	60,000	0.521	B	0.350	A	0.171	No
	SR-905 EB Ramps to Airway Road	5-Ln Prime Arterial	5-Ln w / RM (2-NB, 3-SB)	33,410	50,000[1]	0.668	C	0.459	B	0.209	No
	Airway Road to Siempre Viva Road	4-Ln Major Arterial	4-Ln w / RM	12,190	40,000	0.305	A	0.289	A	0.016	No
Harvest Road	Airway Road to Otay Center Drive	2-Ln w/ Commercial Fronting	2-Ln	5,000	8,000	0.625	C	0.507	C	0.118	No
Otay Center Drive	Harvest Road to Siempre Viva Road	4-Ln Collector	4-Ln	1,680	15,000	0.112	A	0.060	A	0.052	No
Otay Mesa Road	Ocean View Hills Parkway to Corporate Center Drive	6-Ln Prime Arterial	6-Ln w / RM	16,000	60,000	0.267	A	0.251	A	0.016	No
	Corporate Center Drive to Heritage Road	6-Ln Prime Arterial	6-Ln w / RM	10,660	60,000	0.178	A	0.159	A	0.018	No
	Heritage Road to Cactus Road	6-Ln Prime Arterial	6-Ln w / RM	10,080	60,000	0.168	A	0.137	A	0.031	No

Table 15 Roadway Segment Level of Service for E+P Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project			
						V/C	LOS	V/C	LOS	Δ V/C	SI?
Otay Mesa Road	Cactus Road to Britannia Boulevard	6-Ln Prime Arterial	6-Ln w / RM	13,080	60,000	0.218	A	0.163	A	0.055	No
	Britannia Boulevard to Saint Andrews Avenue	6-Ln Prime Arterial	6-Ln w / RM	12,670	60,000	0.211	A	0.177	A	0.034	No
	Saint Andrews Avenue to La Media Road	6-Ln Prime Arterial	6-Ln w / RM	9,630	60,000	0.161	A	0.145	A	0.016	No
	La Media Road to Piper Ranch Road	6-Ln Prime Arterial	6-Ln w / RM	17,550	60,000	0.293	A	0.282	A	0.010	No
Airway Road	Old Otay Mesa Road to Caliente Avenue	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w / CLTL	4,550	30,000	0.152	A	0.131	A	0.021	No
	Village Way to Cactus Road	4-Ln Prime Arterial	4-Ln w/ RM	7,020	40,000	0.176	A	Does Not Exist			No
	Cactus Road to Britannia Boulevard	2-Ln Collector w/ Commercial Fronting	2-Ln	17,040	8,000	2.130	**F**	0.279	A	1.851	**Yes**
	Britannia Boulevard to 1,600 feet west of La Media Road	2-Ln Collector w/ Commercial Fronting	2-Ln	6,360	8,000	0.795	D	0.366	B	0.429	No
	1,600 feet west of La Media Road and La Media Road	2-Ln Collector w/ Commercial Fronting	2-Ln	6,360	8,000	0.795	D	0.366	B	0.429	No
	La Media Road to Avenida Costa Azul	2-Ln Collector w/ Commercial Fronting	2-Ln	8,710	8,000	1.089	**F**	0.855	**E**	0.234	**Yes**
	Avenida Costa Azul to Piper Ranch Road	4-Ln Major Arterial	4-Ln w / RM	8,250	40,000	0.206	A	0.171	A	0.035	No

Table 15 Roadway Segment Level of Service for E+P Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Airway Road	Piper Ranch Road to Harvest Road	2-Ln w/ Continuous-Left-Turn-Lane	2-Ln w / CLTL	6,840	15,000	0.456	B	0.373	B	0.083	No
Siempre Viva Road	Cactus Road	Britannia Blvd	2-Ln	2,300	8,000	0.288	A	0.268	A	0.020	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
RM = Raised Median.
SM = Striped Median.
CLTL = Continuous Left-Turn Lane.
[1] Based on the capacity of a 6-Ln Prime Arterial, reduced to exclude a lane. (5/6*60,000 = 50,000).
[2] Based on the capacity of a 4-Lane Major Arterial, reduced to exclude a lane. (3/4*40,000 = 30,000).
Δ = Change in V/C Ratio.
SI? = Significant Impact.
(Chen Ryan, 2019, Table 5.1)

results are summarized in Table 16, *Freeway Segment Level of Service for E+P Conditions*, which indicates all of the study area freeway segments are currently operating at an acceptable LOS during the peak hours. (Chen Ryan, 2019, p. 62)

Near-Term 2023 Plus Project (Phase 1) Conditions

This subsection provides an analysis of the Near-Term 2023 (Phase 1) traffic conditions with the addition of the Lumina Project. (Chen Ryan, 2019, p. 84)

Roadway Improvements Near-Term 2023 Plus Project (Phase 1) Conditions

The lane configurations and traffic controls assumed to be in place for Near-Term 2023 plus Project conditions are largely identical with those shown previously on Figure 14 and Figure 15, except that it is assumed that Project driveways and those facilities assumed to be constructed by the Project to provide site access are also assumed to be in place for Near-Term 2023 Plus Project (Phase 1) conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways and off-site mitigation improvements to Airway Road between Cactus Road and Britannia Boulevard). Additionally, the La Media Capital Improvement Program (CIP) project is anticipated to be completed by the winter of 2022. Thus, it is assumed that improvements planned as part of the La Media CIP project would be in place for the Near-Term 2023 scenario. However, as a conservative approach, the analysis performed for the Near-Term 2023 scenario assumed only the first phase of the CIP project is in place, which consists of improving the intersection of La Media Road and Airway Road and adjacent roadway segments. (Chen Ryan, 2019, pp. 74, 84)

Table 16 Freeway Segment Level of Service for E+P Conditions

Freeway	Segment	ADT	Direction	# of Lanes	Capacity [a]	D[b]	K[c]	HVF[d]	Peak Hour Volume	V/C	LOS[e]	Peak Hour	Without Project V/C	Without Project LOS	Δ V/C Ratio	SI?
SR-905	I-805 and Caliente Avenue	85,800	EB	4M	9,400	7.6%	66.2%	11.9 %	4,560	0.485	B	AM	0.470	B	0.015	No
			WB	3M+1A	8,460	9.0%	58.8%	11.9 %	4,790	0.566	B	PM	0.540	B	0.026	No
	Caliente Avenue and Heritage Road	77,900	EB	3M	7,050	7.6%	66.2%	11.9 %	2,020	0.287	A	AM	0.270	A	0.017	No
			WB	3M	7,050	9.0%	58.8%	11.9 %	1,400	0.199	A	PM	0.180	A	0.019	No
	Heritage Road and Britannia Boulevard	77,900	EB	3M	7,050	7.6%	66.2%	11.9 %	1,000	0.142	A	AM	0.130	A	0.012	No
			WB	3M	7,050	9.0%	58.8%	11.9 %	840	0.119	A	PM	0.110	A	0.009	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicated substandard LOS.
SI? = Significant Impact?
M = Mainline. A = Auxiliary Lane.
[a] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[b] D = Directional split.| [c] K = Peak hour %. | [d] HV = Heavy vehicle % - consistent with the OMCPU. | [(f)] LOS during highest directional demand.
(Chen Ryan, 2019, Table 5.3)

Near-Term 2023 Plus Project (Phase 1) Traffic Volume Forecasts

This scenario includes Existing traffic volumes plus cumulative development traffic volumes plus Near-Term 2023 (Phase 1) Project traffic. Figure 22, *Near-Term (2023) Plus Project (Phase 1) Roadway Segment Volumes*, shows the ADT volumes and TIS Figure 23, *Near-Term (2023) Plus Project (Phase 1) AM/PM Peak Hour Intersection Volumes,* shows the peak hour intersection turning movement volumes that can be expected for Near-Term 2023 plus Project traffic conditions. (Chen Ryan, 2019, p. 85)

Intersection Level of Service – Near-Term 2023 Plus Project (Phase 1) Traffic Conditions

Near-Term 2023 Plus Project (Phase 1) peak hour traffic LOS has been evaluated for the study area intersections based on the methodologies presented in Section 2.2 of the Project's TIS (*Appendix H*). The intersection LOS results are summarized in Table 17, *Intersection Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions*, which indicate that the following intersection is anticipated to operate at an unacceptable LOS with the addition of Project traffic under E+P conditions. The intersection LOS calculation worksheets are included in Appendix K of the Project's TIS. (Chen Ryan, 2019, pp. 94-97) As shown below, although Intersection #13 is anticipated to operate at an unacceptable LOS with the addition of Project traffic, the increase in delay in during the AM and PM peak hours do not exceed the allowable thresholds. Based upon the significance criteria presented in Section 2.6 of the TIS (*Appendix H*), the above-listed intersection would not be significantly impacted under Near-Term 2023 Plus Project (Phase 1) conditions and mitigation would not be required. (Chen Ryan, 2019, p. 97)

Table 17 Intersection Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Caliente Avenue / SR-905 WB Ramps	Signalized	9.5	A	16.8	B	7.6 / 14.5	A / B	1.9 / 2.3	No
2	Caliente Avenue / SR-905 EB Ramps	Signalized	19.8	B	21.9	C	17.8 / 21.9	B / C	2.0 / 0.0	No
3	Caliente Avenue / Airway Road	Signalized	15.3	B	20.4	C	15.3 / 19.1	B / B	0.0 / 1.3	No
4	Innovative Drive / Otay Mesa Road	SSSC	10.0	A	12.3	B	9.9 / 12.0	A / B	0.1 / 0.3	No
5	Heritage Road / Otay Mesa Road	Signalized	21.2	C	28.9	C	19.0 / 28.1	B / C	2.2 / 0.8	No
6	Cactus Road / Otay Mesa Road	Signalized	12.6	B	15.3	B	9.4 / 13.5	A / B	3.2 / 1.8	No
7	Cactus Road / Airway Road	Signalized	17.6	B	26.6	C	9.3 / 9.5	A / A	8.3 / 17.1	No
8	Britannia Boulevard / Otay Mesa Road	Signalized	17.2	B	51.7	D	14.6 / 30.9	B / C	2.6 / 20.8	No
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	15.8	B	23.0	C	13.1 / 17.6	B / B	2.7 / 5.4	No
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	22.6	C	24.7	C	13.6 / 16.4	B / B	9.0 / 8.3	No
11	Britannia Boulevard / Airway Road	Signalized	69.1	**E**	86.7	**F**	24.4 / 37.4	C / D	44.7 / 49.3	**Yes**
12	St Andrews Avenue / Otay Mesa Road	Signalized	6.7	A	8.0	A	5.0 / 7.9	A / A	1.7 / 0.1	No
13	La Media Road / Otay Mesa Road	Signalized	177.4	**F**	383.8	**F**	179.1 / 383.6	**F / F**	-1.7 / 0.2	No
14	La Media Road / Airway Road	Signalized	9.6	A	10.9	B	9.4 / 10.7	A / B	0.2 / 0.2	No
15	Harvest Road / Airway Road	AWSC	9.3	A	11.1	B	8.8 / 9.5	A / A	0.5 / 1.6	No
16	Village Way / Airway Road	AWSC	7.8	A	10.7	B	Does Not Exist			No
17	Cactus Road / Street "D"	AWSC	7.1	A	7.6	A	Does Not Exist			No
18	Cactus Road / Central Main Street	AWSC	8.9	A	10.9	B	Does Not Exist			No

Table 17 Intersection Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions (Cont'd)

ID	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
19	Cactus Road / Street "C"	Near-Term Year 2027 Plus Project (Full Development) Conditions Only								
20	Cactus Road / Siempre Viva Road	Buildout Conditions Only								
21	Britannia Boulevard / Siempre Viva Road	Buildout Conditions Only								
22	La Media Road / Siempre Viva Road	Buildout Conditions Only								
23	Heritage Road / Avenida De Las Vistas	Buildout Conditions Only								
24	Heritage Road / Datsun Street	Buildout Conditions Only								

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
SI? = Significant Impact?
AWSC = All-Way Stop Control.
SSSC = Side-Street Stop Controlled, the delay shown is the worst delay experienced by any of the approaches.
NA = Not analyzed under this scenario.
(Chen Ryan, 2019, Table 7.2)

- La Media Road/Otay Mesa Road (Intersection #13) – LOS F in the AM and PM peak hours.

Additionally, under the Near-Term 2023 Plus Project (Phase 1) scenario, and consistent with the finding for E+P conditions, the Project would cause a significant impact at the following intersection; for which mitigation would be required:

- Britannia Boulevard/Airway Road (Intersection #11) – LOS E in the AM peak hour and LOS F in the PM peak hour.

Roadway Segment Level of Service – Near-Term 2023 Plus Project (Phase 1) Traffic Conditions

Near-Term 2023 Plus Project (Phase 1) roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Section 2.3 of the Project's TIS (*Appendix H*). The roadway segment LOS results are summarized in Table 18, *Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions,* which indicate that the following roadway segment are anticipated to operate at an unacceptable LOS with the addition of Project traffic under Near-Term 2023 Plus Project (Phase 1) conditions. Impacts to the following road segments would be significant and mitigation would be required. (Chen Ryan, 2019, pp. 90-94)

- Airway Road, between Cactus Road and Britannia Boulevard – LOS F; and

Table 18 Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Ocean View Hills Parkway	Starfish Way to Del Sol Boulevard	4-Ln Major Arterial	4-Ln w / RM	18,470	40,000	0.462	B	0.451	B	0.011	No
	Del Sol Boulevard to Otay Mesa Road	6-Ln Major Arterial	6-Ln w / RM	18,040	50,000	0.361	A	0.350	A	0.011	No
Caliente Avenue	SR-905 WB Ramps to SR-905 EB Ramps	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	23,430	50,000[1]	0.469	B	0.453	B	0.016	No
	SR-905 EB Ramps to Airway Road	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	14,340	50,000[1]	0.287	A	0.271	A	0.016	No
Cactus Road	SR-905 to Street "D"	2-Ln Collector w/ Commercial Fronting	2-Ln	2,110	8,000	0.264	A	0.264	A	0.000	No
	Street "D" to Airway Road	3-Ln Major Arterial	3-Ln w / RM (1 NB-2SB)	3,790	30,000[2]	0.126	A	0.264	A	-0.137	No
	Airway Road to Central Main Street	3-Ln Major Arterial	3-Ln w / RM (1 NB-2SB)	6,580	30,000[2]	0.219	A	0.264	A	-0.044	No
	Central Main Street to Street "C"	2-Ln Collector w/ Commercial Fronting	2-Ln	2,340	8,000	0.293	A	0.264	A	0.029	No
	Street "C" to Siempre Viva Road	2-Ln Collector w/ Commercial Fronting	2-Ln	2,340	8,000	0.293	A	0.264	A	0.029	No

Table 18 Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Britannia Boulevard	Otay Mesa Road to SR-905 WB Ramps	6-Ln Prime Arterial	6-Ln w / RM	30,170	60,000	0.503	B	0.440	B	0.063	No
	SR-905 WB Ramps to SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w / RM	51,170	60,000	0.853	D	0.730	C	0.123	No
	SR-905 EB Ramps to Airway Road	5-Ln Prime Arterial	5-Ln w / RM (2-NB, 3-SB)	54,440	50,000[1]	1.089	**F**	0.939	**E**	0.150	**Yes**
	Airway Road to Siempre Viva Road	4-Ln Major Arterial	4-Ln w / RM	37,820	40,000	0.946	**E**	0.934	**E**	0.011	No
Harvest Road	Airway Road to Otay Center Drive	2-Ln Collector w/ Commercial Fronting	2-Ln	4,730	8,000	0.591	C	0.508	C	0.084	No
Otay Center Drive	Harvest Road to Siempre Viva Road	4-Ln Collector	4-Ln	1,460	15,000	0.097	A	0.060	A	0.037	No
Otay Mesa Road	Ocean View Hills Parkway to Corporate Center Drive	6-Ln Prime Arterial	6-Ln w / RM	35,300	60,000	0.588	C	0.577	B	0.011	No
	Corporate Center Drive to Heritage Road	6-Ln Prime Arterial	6-Ln w / RM	21,620	60,000	0.360	A	0.347	A	0.013	No
	Heritage Road to Cactus Road	6-Ln Prime Arterial	6-Ln w / RM	21,270	60,000	0.355	A	0.332	A	0.022	No
	Cactus Road to Britannia Boulevard	6-Ln Prime Arterial	6-Ln w / RM	23,770	60,000	0.396	A	0.357	A	0.039	No

Table 18 Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Otay Mesa Road	Britannia Boulevard to Saint Andrews Avenue	6-Ln Prime Arterial	6-Ln w / RM	23,500	60,000	0.392	A	0.368	A	0.024	No
	Saint Andrews Avenue to La Media Road	6-Ln Prime Arterial	6-Ln w / RM	20,120	60,000	0.335	A	0.324	A	0.011	No
	La Media Road to Piper Ranch Road	6-Ln Prime Arterial	6-Ln w / RM	32,630	60,000	0.544	B	0.536	B	0.007	No
Airway Road	Old Otay Mesa Road to Caliente Avenue	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w / CLTL	6,020	30,000	0.201	A	0.186	A	0.015	No
	Village Way to Cactus Road	4-Ln Prime Arterial	4-Ln w / RM	5,020	40,000	0.126	A	Does not exist		0.126	No
	Cactus Road to Britannia Boulevard	2-Ln Collector w/ Commercial Fronting	2-Ln	13,000	8,000	1.625	**F**	0.301	A	1.324	**Yes**
	Britannia Boulevard to 1,600 feet west of La Media Road	2-Ln Collector w/ Commercial Fronting	2-Ln	8,810	8,000	1.101	**F**	0.794	D	0.308	**Yes**
	1,600 feet west of La Media Road and La Media Road	4-Ln Major Arterial	4-Ln w/ RM	7,880	40,000	0.197	A	0.136	A	0.062	No
	La Media Road to Avenida Costa Azul	4-Ln Major Arterial	4-Ln w/ RM	9,260	40,000	0.232	A	0.198	A	0.034	No
	Avenida Costa Azul to Piper Ranch Road	4-Ln Major Arterial	4-Ln w / RM	8,930	40,000	0.223	A	0.198	A	0.025	No

Table 18 Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Airway Road	Piper Ranch Road to Harvest Road	2-Ln w/ Continuous-Left-Turn-Lane	2-Ln w / CLTL	7,570	15,000	0.505	C	0.445	B	0.060	No
Siempre Viva Road	Cactus Road to Britannia Blvd	2-Ln Collector w/ Commercial Fronting	2-Ln	2,270	8,000	0.284	A	0.269	A	0.015	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
RM = Raised Median.
CLTL = Continuous Left-Turn Lane.
Δ = Change in V/C Ratio.
SI? = Significant Impact?
[1] Based on the capacity of a 6-Ln Prime Arterial, reduced to exclude a lane. (5/6*60,000 = 50,000).
[2] Based on the capacity of a 4-Lane Major Arterial, reduced to exclude a lane. (3/4*40,000 = 30,000).
(Chen Ryan, 2019, Table 7.1)

- Airway Road, between Britannia Boulevard to 1,600 feet west of La Media Road – LOS F.

Although the roadway segment of Airway Road between La Media and Avenida Costa Azul shown for this this segment would operate at a deficient LOS under Near-Term 2023 Plus Project (Phase 1) conditions, this roadway segment is scheduled for improvement as part of the La Media Road CIP project, and the planned CIP improvements are expected to be in place in 2022 prior to occupancy of Phase 1 of the proposed Project. As shown in Table 18, this roadway segment would operate at an acceptable LOS under Near-Term 2023 conditions with the planned and programmed improvements, and Project impacts to this roadway segment would be less than significant.

Ramp Metering Delay – Near-Term 2023 plus Project (Phase 1) Conditions

Ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results are not included in this scenario and are only included in the Buildout of Community Plan plus Project (Full Development) scenario. (Chen Ryan, 2019, p. 13)

Freeway Segment Level of Service – Near-Term 2023 plus Project (Phase 1) Conditions

Near-Term 2023 Plus Project (Phase 1) peak hour LOS has been evaluated for the study area freeway segments based on the methodologies presented in Section 2.5 of the Project's TIS (*Appendix H*). The freeway segment LOS results are summarized in Table 19, *Freeway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions,* which indicates all of the study area freeway segments would operate at an acceptable LOS during the peak hours under Near-Term 2023 Plus Project (Phase 1) conditions. (Chen Ryan, 2019, p. 97)

Table 19 Freeway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions

Freeway	Segment	ADT	Direction	# of Lanes	Capacity[a]	D[b]	K[c]	HVF[d]	Peak Hour Volume	V/C	LOS[e]	Peak Hour	Without Project V/C	Without Project LOS	Δ V/C Ratio	SI?
SR-905	I-805 and Caliente Avenue	99,600	EB	4M	9,400	66.2%	7.6%	11.9%	5,460	0.580	B	AM	0.560	B	0.020	No
			WB	3M+1A	8,460	58.8%	9.0%	11.9%	5,740	0.680	C	PM	0.660	C	0.020	No
	Caliente Avenue and Heritage Road	97,700	EB	3M	7,050	66.2%	7.6%	11.9%	2,380	0.340	A	AM	0.320	A	0.020	No
			WB	3M	7,050	58.8%	9.0%	11.9%	1,650	0.230	A	PM	0.230	A	0.000	No
	Heritage Road and Britannia Boulevard	97,700	EB	3M	7,050	66.2%	7.6%	11.9%	1,180	0.170	A	AM	0.160	A	0.010	No
			WB	3M	7,050	58.8%	9.0%	11.9%	990	0.140	A	PM	0.130	A	0.010	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicated substandard LOS.
SI? = Significant Impact?
M = Mainline. A = Auxiliary Lane.
[a] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[b] D = Directional split. | [c] K = Peak hour %. | [d] HV = Heavy vehicle % - consistent with the OMCPU. | [e] LOS during highest directional demand.

(Chen Ryan, 2019, Table 7.3)

Near-Term 2027 Plus Project (Full Development) Conditions

This subsection provides a summary of the expected Near-Term2027 Plus Project (Full Development) traffic conditions. (Chen Ryan, 2019, p. 116)

Roadway Improvements Near-Term 2027 Plus Project (Full Development) Conditions

The lane configurations and traffic controls assumed to be in place for Near-Term 2027 Plus Project conditions is shown on Figure 24, *Near-Term (2027) Plus Project (Full Development) Intersection Geometrics*. It is assumed that Project driveways and those facilities constructed by the Project to provide site access are in place for Near-Term 2027 Plus Project (Full Development) conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). Additionally, and consistent with Near-Term 2023 conditions, it is assumed that the La Media CIP (CIP # S15018) project will be in place, which will improve the intersection of La Media Road and Airway Road as well as adjacent roadway segments (City of San Diego, 2018). (Chen Ryan, 2019, p. 116)

Near-Term 2027 Plus Project (Full Development) Traffic Volume Forecasts

This scenario represents Near-Term 2027 Plus Project (Full Development) traffic. Figure 25, *Near-Term (2027) Plus Project (Full Development) Roadway Segment Volumes,* shows the ADT volumes and TIS Figure 26, *Near-Term (2027) Plus Project (Full Development) AM/PM Peak Hour Intersection Volumes,* shows the peak hour intersection turning movement volumes that can be expected for Near-Term 2023 plus Project traffic conditions. (Chen Ryan, 2019, p. 117)

Intersection Level of Service – Near-Term 2027 Plus Project (Full Development) Traffic Conditions

Near-Term 2027 Plus Project (Full Development) peak hour LOS has been evaluated for the study area intersections based on the methodologies presented in Section 2.2 of the Project's TIS (*Appendix H*). The intersection LOS results are summarized in Table 20, *Intersection Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions.* The intersection LOS calculation worksheets are included in Appendix N of the Project's TIS. (Chen Ryan, 2019, pp. 126-128)

Table 20 Intersection Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Caliente Avenue / SR-905 WB Ramps	Signalized	10.9	B	54.4	D	9.5 / 47.0	A / D	1.4 / 7.4	No
2	Caliente Avenue / SR-905 EB Ramps	Signalized	71.2	**E**	35.2	D	71.2 / 34.3	**E** / C	0.0 / 0.9	No
3	Caliente Avenue / Airway Road	Signalized	19.3	B	25.5	C	19.1 / 23.4	B / C	0.2 / 2.1	No
4	Innovative Drive / Otay Mesa Road	SSSC	13.8	B	21.7	C	13.7 / 20.0	B / C	0.1 / 1.7	No
5	Heritage Road / Otay Mesa Road	Signalized	53.8	D	70.0	**E**	49.8 / 69.9	D / **E**	4.0 / 0.1	No
6	Cactus Road / Otay Mesa Road	Signalized	19.7	B	24.8	C	17.5 / 19.8	B / B	2.2 / 5.0	No
7	Cactus Road / Airway Road	Signalized	27.3	C	39.8	D	9.7 / 10.0	A / B	17.6 / 29.8	No
8	Britannia Boulevard / Otay Mesa Road	Signalized	16.3	B	40.0	D	12.2 / 26.5	B / C	4.1 / 13.5	No
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	16.1	B	31.5	C	13.0 / 20.3	B / C	3.1 / 11.2	No
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	48.7	D	52.7	D	19.1 / 18.8	B / B	29.6 / 33.9	No
11	Britannia Boulevard / Airway Road	Signalized	69.1	**E**	76.8	**E**	30.4 / 40.3	C / D	38.7 / 36.5	**Yes**
12	St Andrews Avenue / Otay Mesa Road	Signalized	6.8	A	8.1	A	6.6 / 8.0	A / A	0.2 / 0.1	No
13	La Media Road / Otay Mesa Road	Signalized	346.0	**F**	499.3	**F**	346.0 / 499.8	**F / F**	0.0 / -0.5	No
14	La Media Road / Airway Road	Signalized	15.4	B	16.8	B	14.4 / 15.7	B / B	1.0 / 1.1	No
15	Harvest Road / Airway Road	AWSC	9.6	A	10.6	B	8.8 / 9.5	A / A	0.8 / 1.1	No
16	Village Way / Airway Road	AWSC	10.1	B	17.9	C	Does Not Exist			No
17	Cactus Road / Street "D"	AWSC	7.5	A	8.0	A	Does Not Exist			No
18	Cactus Road / Central Main Street	AWSC	10.1	B	11.5	B	Does Not Exist			No

Table 20 Intersection Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions (Cont'd)

ID	Intersection	Control Type	AM Peak Hour Avg. Delay (sec)	AM Peak Hour LOS	PM Peak Hour Avg. Delay (sec)	PM Peak Hour LOS	Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
19	Cactus Road / Street "C"	AWSC	8.4	A	8.9	A	Does Not Exist			No
20	Cactus Road / Siempre Viva Road	Buildout Conditions Only								
21	Britannia Boulevard / Siempre Viva Road	Buildout Conditions Only								
22	La Media Road / Siempre Viva Road	Buildout Conditions Only								

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
SI? = Significant Impact?
AWSC = All-Way Stop Control.
SSSC = Side-Street Stop Controlled, the delay shown is the worst delay experienced by any of the approaches.
NA = Not analyzed under this scenario.
(Chen Ryan, 2019, Table 9.2)

Consistent with the finding for Near-Term 2023 Plus Project (Phase 1) conditions and E+P conditions, and as shown in Table 20, buildout of the proposed Project would result in significant impacts to the following intersection requiring mitigation.

- Britannia Boulevard/Airway Road (Intersection #11) – LOS E in the AM and PM peak hours.

Roadway Segment Level of Service – Near-Term 2027 Plus Project (Full Development) Traffic Conditions

Near-Term 2027 Plus Project (Full Development) roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Section 2.3 of the Project's TIS (*Appendix H*). The roadway segment LOS results are summarized in Table 21, *Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions*. As shown in Table 21 and consistent with Near-Term 2023 Plus Project (Phase 1) conditions, the Project would result in a significant impact to the following roadway segment under Near-Term 2027 Plus Project (Full Development) conditions: (Chen Ryan, 2019, pp. 122-125)

- Airway Road, between Cactus Road and Britannia Boulevard – LOS F.

Ramp Metering Delay – Near-Term 2027 Plus Project (Full Development) Traffic Conditions

Ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results are not included in this scenario and are only included in the Buildout of Community Plan plus Project (Full Development) scenario. (Chen Ryan, 2019, p. 13)

Table 21 Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Ocean View Hills Parkway	Starfish Way to Del Sol Boulevard	4-Ln Major Arterial	4-Ln w / RM	20,150	40,000	0.504	B	0.476	B	0.028	No
	Del Sol Boulevard to Otay Mesa Road	6-Ln Major Arterial	6-Ln w / RM	19,290	50,000	0.386	A	0.370	A	0.016	No
Caliente Avenue	SR-905 WB Ramps to SR-905 EB Ramps	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	29,550	50,000[1]	0.591	C	0.569	A	0.022	No
	SR-905 EB Ramps to Airway Road	5-Ln Prime Arterial	5-Ln w / SM (3-NB, 2-SB)	20,310	50,000[1]	0.406	A	0.384	A	0.022	No
Cactus Road	SR-905 to Street "D"	2-Ln Collector w/Commercial Fronting	2-Ln	2,080	8,000	0.260	A	0.260	A	0.000	No
	Street "D" to Airway Road	3-Ln Major Arterial	3-Ln w / RM (1NB-2SB)	4,420	30,000[2]	0.147	A	0.260	A	-0.113	No
	Airway Road to Central Main Street	3-Ln Major Arterial	3-Ln w / RM (1NB-2SB)	8,320	30,000[2]	0.277	A	0.260	A	0.017	No
	Central Main Street to Street "C"	3-Ln Major Arterial	3-Ln w / RM (1NB-2SB)	5,200	30,000[2]	0.173	A	0.260	A	-0.087	No
	Street "C" to Siempre Viva Road	3-Ln Major Arterial	3-Ln w / RM (1NB-2SB)	2,400	30,000[2]	0.080	A	0.260	A	-0.180	No
Britannia Boulevard	Otay Mesa Road to SR-905 WB Ramps	6-Ln Prime Arterial	6-Ln w / RM	24,050	60,000	0.401	A	0.289	A	0.088	No

Table 21 Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Britannia Boulevard	SR-905 WB Ramps to SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w / RM	51,120	60,000	0.852	D	0.657	C	0.172	No
	SR-905 EB Ramps to Airway Road	6-Ln Prime Arterial	6-Ln w / RM	53,120	60,000	0.885	D	0.826	C	0.032	No
	Airway Road to Siempre Viva Road	4-Ln Major Arterial	4-Ln w / RM	31,880	40,000	0.797	D	0.779	D	0.016	No
Harvest Road	Airway Road to Otay Center Drive	2-Ln Collector w/ Commercial Fronting	2-Ln	5,000	8,000	0.625	C	0.508	C	0.118	No
Otay Center Drive	Harvest Road to Siempre Viva Road	4-Ln Collector	4-Ln	1,680	15,000	0.112	A	0.060	A	0.052	No
Otay Mesa Road	Ocean View Hills Parkway to Corporate Center Drive	6-Ln Prime Arterial	6-Ln w / RM	43,000	60,000	0.717	C	0.701	C	0.016	No
	Corporate Center Drive to Heritage Road	6-Ln Prime Arterial	6-Ln w / RM	29,790	60,000	0.497	B	0.478	B	0.018	No
	Heritage Road to Cactus Road	6-Ln Prime Arterial	6-Ln w / RM	33,240	60,000	0.554	B	0.523	B	0.031	No

Table 21 Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Otay Mesa Road	Cactus Road to Britannia Boulevard	6-Ln Prime Arterial	6-Ln w / RM	31,300	60,000	0.522	B	0.467	B	0.055	No
	Britannia Boulevard to Saint Andrews Avenue	6-Ln Prime Arterial	6-Ln w / RM	21,220	60,000	0.354	A	0.320	A	0.034	No
	Saint Andrews Avenue to La Media Road	6-Ln Prime Arterial	6-Ln w / RM	17,860	60,000	0.298	A	0.282	A	0.016	No
	La Media Road to Piper Ranch Road	6-Ln Prime Arterial	6-Ln w / RM	32,190	60,000	0.537	B	0.526	B	0.011	No
Airway Road	Old Otay Mesa Road to Caliente Avenue	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w / CLTL	6,900	30,000	0.230	A	0.209	A	0.021	No
	Village Way to Cactus Road	4-Ln Prime Arterial	4-Ln w/ RM	7,020	40,000	0.176	A	Does not exist		0.176	No
	Cactus Road to Britannia Boulevard	4-Ln Collector	4-Ln	18,120	15,000	1.208	**F**	0.414	B	0.794	**Yes**
	Britannia Boulevard to 1,600 feet west of La Media Road	2-Ln Collector	2-Ln w/ CLTL	8,520	15,000	0.568	C	0.636	C	-0.068	No
	1,600 feet west of La Media Road to La Media Road	4-Ln Major Arterial	4-Ln w/ RM	7,470	40,000	0.187	A	0.101	A	0.086	No

Table 21 Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Airway Road	La Media Road to Avenida Costa Azul	4-Ln Major Arterial	4-Ln w/ RM	9,790	4,000	0.245	A	0.198	A	0.047	No
	Avenida Costa Azul to Piper Ranch Road	4-Ln Major Arterial	4-Ln w / RM	9,330	40,000	0.233	A	0.198	A	0.035	No
	Piper Ranch Road to Harvest Road	2-Ln w/ Continuous-Left-Turn-Lane	2-Ln w / CLTL	7,920	15,000	0.528	C	0.445	B	0.083	No
Siempre Viva Road	Cactus Road to Britannia Blvd	2-Ln Collector w/ Commercial Fronting	2-Ln	2,310	8,000	0.289	A	0.269	A	0.020	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
RM = Raised Median.
CLTL = Continuous Left-Turn Lane.
Δ = Change in V/C Ratio.
SI? = Significant Impact?
[1] Based on the capacity of a 6-Ln Prime Arterial, reduced to exclude a lane. (5/6*60,000 = 50,000).
[2] Based on the capacity of a 4-Lane Major Arterial, reduced to exclude a lane. (3/4*40,000 = 30,000).
(Chen Ryan, 2019, Table 9.1)

Freeway Segment Level of Service– Near-Term 2027 Plus Project (Full Development) Conditions

Near-Term 2027 Plus Project (Full Development) peak hour LOS has been evaluated for the study area freeway segments based on the methodologies presented in Section 2.5 of the Project's TIS (*Appendix H*). The freeway segment LOS results are summarized in Table 22, *Freeway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions,* which indicates all of the study area freeway segments would operate at an acceptable LOS during the peak hours under Near-Term 2027 Plus Project (Full Development) conditions. (Chen Ryan, 2019, p. 129)

Buildout of Community Plan Plus Project (Full Development) Conditions

This subsection provides a summary of the expected Buildout of Community Plan cumulative traffic conditions with the addition of the Lumina Project. (Chen Ryan, 2019, p. 149)

Roadway Improvements Buildout of Community Plan Plus Project (Full Development) Conditions

The lane configurations and traffic controls assumed to be in place for Buildout of Community Plan

Table 22 Freeway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions

Freeway	Segment	ADT	Direction	# of Lanes	Capacity[a]	D[b]	K[c]	HVF[d]	Peak Hour Volume	V/C	LOS[e]	Peak Hour	Without Project V/C	Without Project LOS	Δ V/C Ratio	SI?
SR-905	I-805 and Caliente Avenue	115,400	EB	4M	9,400	66.2%	7.6%	11.9%	6,140	0.650	C	AM	0.630	C	0.020	No
			WB	3M+1A	8,460	58.8%	9.0%	11.9%	6,450	0.760	C	PM	0.740	C	0.020	No
	Caliente Avenue and Heritage Road	94,800	EB	3M	7,050	66.2%	7.6%	11.9%	2,460	0.350	A	AM	0.330	A	0.020	No
			WB	3M	7,050	58.8%	9.0%	11.9%	1,710	0.240	A	PM	0.230	A	0.010	No
	Heritage Road and Britannia Boulevard	94,800	EB	3M	7,050	66.2%	7.6%	11.9%	1,220	0.170	A	AM	0.160	A	0.010	No
			WB	3M	7,050	58.8%	9.0%	11.9%	1,020	0.140	A	PM	0.140	A	0.000	No

Source: Chen Ryan Associates, February 2019

Notes:
Bold letter indicated substandard LOS.
SI? = Significant Impact?
M = Mainline, A = Auxiliary Lane.
[a] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[b] D = Directional split. | [c] K = Peak hour %. | [d] HV = Heavy vehicle % - consistent with the OMCPU. | [e] LOS during highest directional demand.

(Chen Ryan, 2019, Table 9.3)

Plus Project conditions are shown on Figure 27 ,*Buildout of Community Plan Plus Project (Full Development) Intersection Geometrics*. It is assumed that Project driveways and those facilities constructed by the Project to provide site access are in place for Buildout of Community Plan Plus Project (Full Development) conditions (e.g., intersection and roadway improvements at the Project's frontage and driveways). Additionally, it is assumed that improvements would occur in conjunction with other developments within the OMCPU, with the anticipated roadway network depicted on Figure 28, *Buildout of Community Plan Roadway Geometrics*. Additionally, it is assumed that the La Media Road CIP (CIP # S15018) project is in place, which includes improvements to the intersection of La Media Road at Airway Road and adjacent roadway segments. (Chen Ryan, 2019, p. 149)

Buildout of Community Plan Plus Project (Full Development) Traffic Volume Forecasts

This scenario includes buildout of the Otay Mesa Community Plan cumulative traffic conditions with Full Development Project traffic. Figure 29, *Buildout of Community Plan Plus Project (Full Development) Roadway Segment Volumes*, shows the ADT volumes and Figure 30, *Buildout of Community Plan Plus Project (Full Development) AM/PM Peak Hour Intersection Volumes*, shows the peak hour intersection turning movement volumes that can be expected for Buildout of Community Plan Plus Project traffic conditions. (Chen Ryan, 2019, p. 149)

Intersection Level of Service – Buildout of Community Plan Plus Project (Full Development) Traffic Conditions

Buildout of Community Plan Plus Project (Full Development) peak hour LOS has been evaluated for the study area intersections based on the methodologies presented in Section 2.2 of the Project's TIS (*Appendix H*). The intersection LOS results are summarized in Table 23, *Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions*, which indicate the following intersections are anticipated to operate at an unacceptable LOS under Buildout Plus Project conditions and also would experience Project-related significant impacts. The intersection LOS calculation worksheets are included in Appendix Q of the Project's TIS. (Chen Ryan, 2019, pp. 163-172)

Table 23 Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
1	Caliente Avenue / SR-905 WB Ramps	Signalized	93.5	F	67.8	E	92.9 / 66.7	F / E	0.6 / 1.1	No
2	Caliente Avenue / SR-905 EB Ramps	Signalized	170.0	F	151.2	F	167.4 / 143.2	F / F	2.6 / 8.0	Yes
3	Caliente Avenue / Airway Road	Signalized	179.0	F	103.3	F	178.7 / 96.9	F / F	0.3 / 6.4	Yes
4	Innovative Drive / Otay Mesa Road	Signalized	42.5	D	103.1	F	41.4 / 100.8	D / F	1.1 / 2.3	Yes
5	Heritage Road / Otay Mesa Road	Signalized	452.8	F	384.7	F	411.0 / 336.3	F / F	41.8 / 48.4	Yes
6	Cactus Road / Otay Mesa Road	Signalized	367.5	F	246.1	F	359.9 / 211.6	F / F	7.6 / 34.5	Yes
7	Cactus Road / Airway Road	Signalized	256.5	F	394.1	F	164.0 / 290.8	F / F	92.5 / 103.3	Yes
8	Britannia Boulevard / Otay Mesa Road	Signalized	69.3	E	50.2	D	39.6 / 31.6	D / C	29.7 / 18.6	Yes
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	222.2	F	380.7	F	203.4 / 334.5	F / F	18.8 / 46.2	Yes
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	386.9	F	255.1	F	334.7 / 206.3	F / F	52.2 / 48.8	Yes
11	Britannia Boulevard / Airway Road	Signalized	623.6	F	471.7	F	510.9 / 379.4	F / F	112.7 / 92.3	Yes
12	St Andrews Avenue / Otay Mesa Road	Signalized	9.6	A	9.9	A	8.9 / 8.3	A / A	0.7 / 1.6	No
13	La Media Road / Otay Mesa Road	Signalized	343.6	F	256.4	F	340.7 / 252.0	F / F	2.9 / 4.4	Yes
14	La Media Road / Airway Road	Signalized	332.9	F	322.1	F	312.1 / 308.2	F / F	20.8 / 13.9	Yes
15	Harvest Road / Airway Road	Signalized	88.3	F	8.5	A	87.9 / 9.2	F / A	0.4 / -0.7	No
16	Village Way / Airway Road	AWSC	N/A[1]	F	N/A[1]	F	Does Not Exist			Yes
17	Cactus Road / Street "D"	AWSC	N/A[1]	F	500.3	F	Does Not Exist			Yes
18	Cactus Road / Central Main Street	AWSC	N/A[1]	F	N/A[1]	F	Does Not Exist			Yes

Table 23 Intersection Level of Service for Buildout of the Community Plan Plus Project Conditions (Cont'd)

ID	Intersection	Control Type	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	SI?
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS				
19	Cactus Road / Street "C"	AWSC	N/A[1]	F	N/A[1]	F	Does Not Exist			Yes
20	Cactus Road / Siempre Viva Road	Signalized	46.1	D	265.0	F	40.5 / 219.4	D / F	5.6 / 45.6	Yes
21	Britannia Blvd / Siempre Viva Road	Signalized	265.5	F	246.8	F	248.1 / 230.1	F / F	17.4 / 16.7	Yes
22	La Media Road / Siempre Viva Road	Signalized	462.8	F	257.2	F	456.5 / 249.9	F / F	6.3 / 7.3	Yes
23	Heritage Road / Avenida De Las Vistas	Signalized	326.4	F	268.3	F	318.0 / 256.9	F / F	8.4 / 11.4	Yes
24	Heritage Road / Datsun Street	Signalized	502.5	F	636.4	F	477.1 / 604.5	F / F	25.4 / 31.9	Yes

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
SI? = Significant Impact?
AWSC = All Way Stop Control.
SSSC = Side-Street Stop Controlled, the delay shown is the worst delay experienced by any of the approaches.
[1] Exceeds maximum reasonable calculable delay of 600 seconds per Synchro 9.0 traffic analysis software.
(Chen Ryan, 2019, Table 11.3)

- Caliente Avenue / SR-905 EB Ramps (Intersection #2) – LOS F in the AM and PM peak hours;
- Caliente Avenue / Airway Road (Intersection #3) – LOS F in the AM and PM peak hours;
- Innovative Drive / Otay Mesa Road (Intersection #4) – LOS F during the PM peak hour only;
- Heritage Road / Otay Mesa Road (Intersection #5) – LOS F in the AM and PM peak hours;
- Cactus Road / Otay Mesa Road (Intersection #6) – LOS F in the AM and PM peak hours;
- Cactus Road / Airway Road (Intersection #7) – LOS F in the AM and PM peak hours;
- Otay Mesa Road / Britannia Boulevard (Intersection #8) – LOS E during the AM peak hour only;
- Britannia Boulevard / SR-905 WB Ramps (Intersection #9) – LOS F during the AM and PM peak hours;
- Britannia Boulevard / SR-905 EB Ramps (Intersection #10) – LOS F during the AM and PM peak hours;
- Britannia Boulevard / Airway Road (Intersection #11) – LOS F during the AM and PM peak hours;
- La Media Road / Otay Mesa Road (Intersection #13) – LOS F during the AM and PM peak hours;
- La Media Road / Airway Road (Intersection #14) – LOS F during the AM and PM peak hours;
- Village Way / Airway Road (Intersection #16) – LOS F during the AM and PM peak hours;
- Cactus Road / Street "D" (Intersection #17) – LOS F during the AM and PM peak hours;

- Cactus Road / Central Main Street (Intersection #18) – LOS F during the AM and PM peak hours;
- Cactus Road / Street "C" (Intersection #19) – LOS F during the AM and PM peak hours;
- Cactus Road / Siempre Viva Road (Intersection #20) – LOS F during the PM peak hour only;
- Britannia Boulevard / Siempre Viva Road (Intersection #21) – LOS F during the AM and PM peak hours;
- La Media Road / Siempre Viva Road (Intersection #22) – LOS F during the AM and PM peak hours;
- Heritage Road / Avenida De Las Vistas (Intersection #23) – LOS F during the AM and PM peak hours; and
- Heritage Road / Datsun Street (Intersection #24) – LOS F during the AM and PM peak hours.

Although impacts to the above-listed intersections would be significant and unavoidable under Buildout of Community Plan Plus Project (Full Development) conditions, the impacts identified above are consistent with those identified by the OMCPU EIR. Additionally, because the Project would produce less traffic than was assumed by the OMCPU EIR, impacts to the above-listed intersections would be less than was disclosed by the OMCPU EIR. As such, the Project would not result in any new or more severe impacts to study area intersections as compared to what was evaluated and disclosed by the OMCPU EIR.

Additionally, the following two intersections are anticipated to operate at an unacceptable LOS under Buildout of Community Plan Plus Project (Full Development) conditions; however, the increase in delay during the AM and PM peak hours do not exceed the allowable thresholds. Based upon the significance criteria presented in Section 2.6 of the TIS (*Appendix H*), the below-listed intersections would not be significantly impacted under Buildout of the Community Plan plus Project (Full Development) conditions. (Chen Ryan, 2019, pp. 163-172)

- Caliente Avenue/SR-905 WB Ramps (Intersection #1) – LOS F in the AM peak hour and LOS E in the PM peak hour; and
- Harvest Road/Airway Road (Intersection #15) – LOS F during the AM peak hour only.

Roadway Segment Level of Service – Buildout of Community Plan Plus Project (Full Development) Traffic Conditions

Buildout of Community Plan Plus Project (Full Development) roadway segment LOS has been evaluated for the study area roadway segments based on the methodologies presented in Section 2.3 of the Project's TIS (*Appendix H*). The roadway segment LOS results are summarized in Table 24, *Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of San Diego,* and Table 25, *Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of Chula Vista*, which indicate that the following roadway segments are anticipated to operate at an unacceptable LOS and also would result in a significant impact with the addition of Project traffic. (Chen Ryan, 2019, pp. 155-162)

- Heritage Road, between Main Street and Avenida De Las Vista – LOS F (City of Chula Vista);
- Heritage Road, between Avenida De Las Vistas and Datsun Street – LOS F;
- Cactus Road, between Street "D" and Airway Road – LOS F;
- Cactus Road, between Airway Road and Central Main Street – LOS E;

Table 24 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of San Diego

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Ocean View Hills Parkway	Starfish Way to Del Sol Boulevard	6-Ln Major Arterial	6-Ln w/ RM	21,640	50,000	0.433	B	0.420	B	0.012	No
	Del Sol Boulevard to Otay Mesa Road	6-Ln Major Arterial	6-Ln w/ RM	34,540	50,000	0.691	C	0.675	C	0.016	No
Caliente Avenue	SR-905 WB Ramps to SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w/ RM	37,360	60,000	0.623	C	0.605	C	0.018	No
	SR-905 EB Ramps to Airway Road	6-Ln Prime Arterial	6-Ln w/ RM	31,360	60,000	0.523	B	0.505	B	0.018	No
Heritage Road	Avenida De Las Vistas to Datsun Street	6-Ln Prime Arterial	6-Ln w/ RM	74,500	60,000	1.242	F	1.213	F	0.029	Yes
	Datsun Street to Otay Mesa Road	6-Ln Prime Arterial	6-Ln w/ RM	46,910	60,000	0.782	C	0.751	C	0.031	No
Cactus Road	SR-905 to Street "D"	2-Ln Collector w/Commercial Fronting	2-Ln	39,500	40,000	0.988	E	0.988	E	0.000	No
	Street "D" to Airway Road	4-Ln Major Arterial	4-Ln w/ RM	43,390	40,000	1.085	F	0.984	E	0.101	Yes
	Airway Road to Central Main Street	4-Ln Major Arterial	4-Ln w/ RM	38,960	40,000	0.974	E	0.908	E	0.066	Yes
	Central Main Street to Street "C"	4-Ln Major Arterial	4-Ln w/ RM	38,960	40,000	0.974	E	0.908	E	0.066	Yes
	Street "C" to Siempre Viva Road	4-Ln Major Arterial	4-Ln w/ RM	38,960	40,000	0.974	E	0.923	E	0.051	Yes

Table 24 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of San Diego (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Britannia Boulevard	Otay Mesa Road to SR-905 WB Ramps	6-Ln Prime Arterial	6-Ln w/ RM	24,570	60,000	0.410	A	0.290	A	0.120	No
	SR-905 WB Ramps to SR-905 EB Ramps	6-Ln Prime Arterial	6-Ln w/ RM	56,920	60,000	0.949	**E**	0.777	C	0.171	**Yes**
	SR-905 EB Ramps to Airway Road	6-Ln Prime Arterial	6-Ln w/ RM	56,920	60,000	0.949	**E**	0.775	C	0.174	**Yes**
	Airway Road to Siempre Viva Road	6-Ln Major Arterial	6-Ln w/ RM	44,140	50,000	0.883	D	0.870	D	0.012	No
Harvest Road	Airway Road to Otay Center Drive	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w/ CLTL	15,910	30,000	0.530	C	0.525	C	0.005	No
Otay Center Drive	Harvest Road to Siempre Viva Road	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w/ CLTL	15,410	30,000	0.514	C	0.508	C	0.005	No
Otay Mesa Road	Ocean View Hills Parkway to Corporate Center Drive	6-Ln Prime Arterial	6-Ln w/ RM	71,870	60,000	1.198	**F**	1.182	**F**	0.016	**Yes**
	Corporate Center Drive to Heritage Road	6-Ln Prime Arterial	6-Ln w/ RM	50,690	60,000	0.845	D	0.827	C	0.018	No
	Heritage Road to Cactus Road	6-Ln Prime Arterial	6-Ln w/ RM	74,320	60,000	1.239	**F**	1.176	**F**	0.062	**Yes**
	Cactus Road to Britannia Boulevard	6-Ln Prime Arterial	6-Ln w/ RM	41,000	60,000	0.683	C	0.598	B	0.086	No
	Britannia Boulevard to Saint Andrews Avenue	6-Ln Prime Arterial	6-Ln w/ RM	49,070	60,000	0.818	C	0.784	C	0.034	No

Table 24 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of San Diego (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Otay Mesa Road	Saint Andrews Avenue to La Media Road	6-Ln Prime Arterial	6-Ln w/ RM	41,710	60,000	0.695	C	0.680	C	0.015	No
	La Media Road to Piper Ranch Road	6-Ln Prime Arterial	6-Ln w/ RM	53,380	60,000	0.890	D	0.879	D	0.011	No
Airway Road	Old Otay Mesa Road to Caliente Avenue	4-Ln w/ Continuous-Left-Turn-Lane	4-Ln w/ CLTL	10,140	30,000	0.338	B	0.317	A	0.021	No
	Caliente Avenue to Heritage Road	4-Ln Major Arterial	4-Ln w/ RM	38,000	40,000	0.950	**E**	0.950	**E**	0.000	No
	Heritage Road to Village Way	6-Ln Prime Arterial	6-Ln w/ RM	56,770	60,000	0.948	**E**	0.844	D	0.104	**Yes**
	Village Way to Cactus Road	6-Ln Prime Arterial	6-Ln w/ RM	56,870	60,000	0.948	**E**	0.844	D	0.104	**Yes**
	Cactus Road to Britannia Boulevard	6-Ln Major Arterial	6-Ln w/ RM	36,970	50,000	0.739	C	0.475	B	0.265	No
	Britannia Boulevard to La Media Road	4-Ln Major Arterial	4-Ln w/ RM	34,090	40,000	0.852	D	0.806	D	0.047	No
	La Media Road to Avenida Costa Azul	4-Ln Major Arterial	4-Ln w/ RM	33,730	40,000	0.843	D	0.832	D	0.012	No
	Avenida Costa Azul to Piper Ranch Road	4-Ln Major Arterial	4-Ln w/ RM	33,730	40,000	0.843	D	0.832	D	0.012	No

Table 24 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of San Diego (Cont'd)

Roadway	Segment	Functional Classification	Cross-Section	ADT	Capacity (LOS E)	With Project		Without Project		Δ V/C	SI?
						V/C	LOS	V/C	LOS		
Airway Road	Piper Ranch Road to Harvest Road	4-Ln Major Arterial	4-Ln w/ RM	33,820	40,000	0.846	D	0.838	D	0.008	No
Siempre Viva Road	Cactus Road to Britannia Boulevard	6-Ln Prime Arterial	6-Ln w/ RM	35,820	60,000	0.597	C	0.563	B	0.034	No
	Britannia Boulevard to La Media Road	6-Ln Prime Arterial	6-Ln w/ RM	41,320	60,000	0.689	C	0.655	C	0.034	No
	La Media Road to Customhouse Plaza	6-Ln Prime Arterial	6-Ln w/ RM	39,690	60,000	0.662	C	0.638	C	0.023	No

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
V/C = Volume to Capacity Ratio.
RM = Raised Median.
CLTL = Continuous Left-Turn Lane.
Δ = Change in V/C Ratio
SI? = Significant Impact?
(Chen Ryan, 2019, Table 11.1)

Table 25 Roadway Segment Level of Service Buildout of the Community Plan Plus Project Conditions – City of Chula Vista

Roadway	Segment	Functional Classification	Cross-Section	ADT	LOS Threshold (LOS C)	LOS w/ Project	Project Contribution ≥ 5%?	Project ADT > 800?	Intersection along Segment Operating @ LOS D or Better?	SI?
Heritage Road	Main Street to Avenida De Las Vistas	Prime Arterial	6-Ln w / RM	82,090	50,000	F	Yes	Yes	No	**Yes**

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
RM = Raised Median.
SI? = Significant Impact?
(Chen Ryan, 2019, Table 11.2)

- Cactus Road, between Central Main Street and Street "C" – LOS E;
- Cactus Road, between Street "C" and Siempre Viva Road – LOS E;
- Britannia Boulevard, between SR-905 WB Ramps and SR-905 EB Ramps – LOS E;
- Britannia Boulevard, between SR-905 EB Ramps and Airway Road – LOS E;
- Otay Mesa Road, between Ocean View Hills Parkway and Corporate Center Drive – LOS F;
- Otay Mesa Road, between Heritage Road and Cactus Road – LOS F;
- Airway Road, between Heritage Road and Village Way – LOS E; and
- Airway Road, between Village Way to Cactus Road – LOS E.

Although impacts to the above-listed roadway segments would be significant and unavoidable under Buildout of Community Plan Plus Project (Full Development) conditions, the impacts identified above are consistent with impacts identified by the OMCPU EIR. Additionally, the proposed Project would produce less traffic than was anticipated by the OMCPU EIR, and therefore impacts to the above-listed roadway segments would be less than was evaluated in the OMCPU EIR. As such, the Project would not result in any new or more severe impacts to study area roadway segments as compared to what was evaluated and disclosed by the OMCPU EIR.

Additionally, the following two roadway segments are anticipated to operate at an unacceptable LOS under Buildout conditions; however, the increase in delay during the AM and PM peak hours do not exceed the allowable thresholds. Based upon the significance criteria presented in Section 2.2 of the TIS (*Appendix H*), the below-listed roadway segments would not be significantly impacted under Buildout of the Community Plan plus Project (Full Development) conditions and mitigation would not be required. (Chen Ryan, 2019, pp. 155-162)

- Cactus Road, between SR-905 and Street "D" – LOS E; and
- Airway Road, between Caliente Avenue and Heritage Road – LOS E.

Ramp Metering Delay – Buildout of Community Plan Plus Project (Full Development) Conditions

Ramp meters are currently in place in the Project study area; however, the ramp meters would not become operational until the Buildout of Community Plan scenario. Buildout of Community Plan Plus Project (Full Development) traffic delay has been evaluated for the study area ramp meters based on the methodologies presented in Section 2.4 of the Project's TIS (*Appendix H*). The freeway ramp metering delay results are summarized in Table 26, *Ramp Metering Delay for Buildout of the Community Plan Plus Project Conditions*, which indicates that the following freeway on-ramps are would experience delays higher than 15 minutes under Buildout of Community Plan plus Project traffic conditions. (Chen Ryan, 2019, pp. 172-173)

- SR-905 / Britannia Blvd WB On-ramp (PM).

The downstream freeway segment of Westbound SR-905 between Heritage Road and Britannia would operate at LOS A in the PM peak hour (as discussed in further detail below and shown in Table 27); thus, impacts to the SR-905 / Britannia Blvd WB on-ramp would less-than-significant under Buildout of Community Plan Plus Project (Full Development) conditions. It should be noted that the OMCPU EIR disclosed that this segment of freeway on-ramps would operate at delays over 15 minutes, and disclosed impacts to this location as a significant and unavoidable impact of the OMCPU. The proposed Project would produce less traffic than was assumed by the OMCPU EIR;

Table 26 Ramp Metering Delay for Buildout of the Community Plan Plus Project Conditions

Location	Peak Hour	Total Demand [1] (veh/hr)	SOV Demand[2]	Meter Rate [3] (veh/hr)	Excess Demand [4] (veh/hr)	Delay [5] (min)	Queue [6] (ft)	Delay without project (sec.)	Queue without project (ft)	Delay increase (sec.)
SR-905 WB On-ramp @ Caliente Ave	AM	1,865	1,865	960	905	56.56	22,625	56.56	22,625	0
	PM	1,555	1,555	960	595	37.19	14,875	37.19	14,875	0
SR-905 EB On-ramp @ Caliente Ave	AM	395	395	960	0	0	0	0	0	0
	PM	390	390	960	0	0	0	0	0	0
SR-905 WB On-ramp @ Britannia Blvd	AM	1,170	585	960	0	0	0	0	0	0
	PM	3,335	1,668	960	708	44.25	17,700	40.5	16,200	3.75
SR-905 EB On-ramp @ Britannia Blvd	AM	705	353	960	0	0	0	0	0	0
	PM	1,405	703	960	0	0	0	0	0	0

Source: Chen Ryan Associates, February 2019.

Notes:
SOV = Single Occupancy Vehicle
[1] Total Demand is the peak hour demand for both SOV and HOV lanes expected to use the on-ramp.
[2] SOV Demand = (Total Demand) – (HOV Demand).
[3] Meter Rate is the peak hour capacity expected to be processed through the ramp meter per lane. This value was obtained from Caltrans. The average between the "high" and "low" meter rate was used for this analysis.
[4] Excess Demand = (Demand) – (Meter Rate) or zero, whichever is greater.
[5] Delay = (Excess Demand / Meter Rate) X 60 min/hr.
[6] Queue = (Excess Demand) X 25 ft/veh per OM CPU. SOV volumes were used in the calculation of Queue. A zero represents no excess queue.
(Chen Ryan, 2019, Table 11.4)

thus, the Project's impacts to the above-listed on-ramp would be less than was disclosed by the OMCPU EIR. (Chen Ryan, 2019, pp. 172-173)

Additionally, the following ramp meter is anticipated to experience delays higher than 15 minutes under Buildout conditions; however, the Project does not contribute to any increase in delay. Based upon the significance criteria presented in Section 2.6 of the TIS (*Appendix H*), the below-listed ramp meter would not be significantly impacted under Buildout of the Community Plan plus Project (Full Development) conditions and mitigation would not be required. (Chen Ryan, 2019, pp. 172-173)

- SR-905 / Caliente Avenue WB On-ramp (AM and PM).

Freeway Segment Level of Service – Buildout of Community Plan Plus Project (Full Development) Conditions

Buildout of Community Plan Plus Project (Full Development) LOS has been evaluated for the study area freeway segments based on the methodologies presented in Section 2.5 of the Project's TIS (*Appendix H*). The freeway segment LOS results are summarized in Table 27, *Freeway Segment Level of Service for Buildout of the Community Plan Plus Project Conditions,* which indicates that the following

Table 27 Freeway Segment Level of Service for Buildout of the Community Plan Plus Project Conditions

Freeway	Segment	ADT	Direction	# of Lanes	Capacity[a]	D[b]	K[c]	HVF[d]	Peak Hour Volume	V/C	LOS[e]	Peak Hour	Without Project V/C	Without Project LOS	Δ V/C Ratio	SI?
SR-905	I-805 and Caliente Avenue	217,100	EB	4M	9,400	7.6%	66.2%	11.9%	11,530	1.227	F	AM	1.213	F	0.014	Yes
			WB	3M+1A	8,460	9.0%	58.8%	11.9%	12,130	1.434	F	PM	1.418	F	0.015	Yes
	Caliente Avenue and Heritage Road	215,000	EB	3M	7,050	7.6%	66.2%	11.9%	5,560	0.789	C	AM	0.780	C	0.009	No
			WB	3M	7,050	9.0%	58.8%	11.9%	3,870	0.549	B	PM	0.539	B	0.010	No
	Heritage Road and Britannia Boulevard	190,000	EB	3M	7,050	7.6%	66.2%	11.9%	2,430	0.345	A	AM	0.340	A	0.004	No
			WB	3M	7,050	9.0%	58.8%	11.9%	2,040	0.289	A	PM	0.284	A	0.006	No

Source: Chen Ryan Associates, February 2019

Notes:
Bold letter indicated substandard LOS.
SI? = Significant Impact?
M = Mainline. A = Auxiliary Lane.
[a] The capacity is calculated as 2,350 ADT per main lane and 1,410 ADT (60% of the main lane capacity) per auxiliary lane.
[b] D = Directional split. | [c] K = Peak hour %. | [d] HV = Heavy vehicle % - consistent with the OMCPU. | [e] LOS during highest directional demand

(Chen Ryan, 2019, Table 11.5)

freeway segments are anticipated to operate at an unacceptable LOS with the addition of Project traffic. (Chen Ryan, 2019, pp. 174-175)

- SR-905, between I-805 and Caliente Avenue (LOS F in the Eastbound direction); and
- SR-905 between I-805 and Caliente Avenue (LOS F in the Westbound direction).

Based upon the significance criteria presented in Section 2.6 of the TIS (*Appendix H*), mitigation measures would be required at the above-listed freeway segments to achieve acceptable LOS. However, these facilities are under the purview of Caltrans, and no current plans exist to widen this freeway segment; thus, these freeway segments would continue to operate at LOS F with the addition of Project traffic. However, the OMCPU EIR disclosed that both of these segments of SR-905 would operate at a deficient LOS F, and the OMCPU EIR disclosed impacts to these freeway segments as a significant and unavoidable impact of the OMCPU. The proposed Project would produce less traffic than was assumed by the OMCPU EIR; thus, the Project's impacts to the above-listed segments of SR-905 would be less than was disclosed by the OMCPU EIR. (Chen Ryan, 2019, pp. 174-175)

Significance of Impacts After Mitigation

Subsection 3.10, *Phasing*, of the CVSP requires all future implementing development projects within the CVSP to prepare a project-level traffic study to identify the transportation and circulation improvements needed to ensure that impacted transportation facilities operate at acceptable levels of service, and to determine whether each implementing development would result in significant and unavoidable traffic impacts not identified by the OMCPU EIR due to site-specific conditions or actual phasing of development. In accordance with Section 3.10 of the CVSP, the Project's TIS (*Appendix H*) identifies improvements needed to ensure that impacts to the transportation facilities as identified herein are mitigated to the maximum feasible extent. Pursuant to Section 3.10 of the CVSP, the Project's recommended improvements to mitigate for the above-described Project-specific impacts are included as Project-specific Mitigation Measures MM-30 through MM-56 in this document. It should be noted that in order to aid the implementation of Project-specific Mitigation

Measures MM-31 through MM-56, a condition of approval would be imposed upon future development permits (i.e., the future required NDPs) requiring the preparation of a tracking chart that identifies each development permit that has been approved within the CVSP and the associated ADT to ensure that the required mitigation is implemented before any projected LOS deficiencies. As demonstrated below, with implementation of the recommended improvements included in the TIS, near-term direct impacts would be reduced to less-than-significant levels and Project impacts due to buildout of the Community Plan would be within the scope of analysis of the OMCPU EIR and would be slightly reduced in comparison to what was evaluated and disclosed by the OMCPU EIR due to the approximately 7% reduction in traffic associated with the Project as compared to what was assumed for the site by the OMCPU EIR. Furthermore, OMCPU Mitigation Measure TRF-1 would apply to the Project, which requires improvements to intersections throughout the OMCPU area in accordance with OMCPU EIR Figure 5.12-4. The Project's recommended improvements would be in accordance with OMCPU Mitigation Measure TRF-1.

Provided below is a summary of the significance of the Project's impacts to transportation and traffic following implementation of Project-specific Mitigation Measures MM-30 through MM-56 for each phase of the proposed Project.

Near-Term 2023 Plus Project (Phase 1)

Intersection Level of Service – Near-Term 2023 Plus Project (Phase 1)

As shown in Table 28, *Intersection Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions with Mitigation*, with implementation of Project-specific Mitigation Measure MM-31, the intersection of Britannia Boulevard at Airway Road (Intersection #11) would operate at an acceptable LOS D during the AM and PM peak hours under Near-Term 2023 Plus Project (Phase 1) conditions and impacts would be reduced to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 101)

Table 28 Intersection Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions with Mitigation

			Before Mitigation measures				After Mitigation measures			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
ID	Intersection	Control Type	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
11	Britannia Blvd / Airway Road	Signal	69.1	**E**	86.7	**F**	45.8	D	54.5	D

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
(Chen Ryan, 2019, Table 7.5)

Roadway Segment Level of Service – Near-Term 2023 Plus Project (Phase 1)

As shown in Table 29, *Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions with Mitigation*, with implementation of Project-specific Mitigation Measures MM-32, MM-33, and MM-34, all of the roadway segments directly impacted by the Project under Near-Term 2023 Plus Project (Phase 1) conditions would operate at an acceptable LOS D or better and impacts would be reduced to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, pp. 99-100)

Table 29 Roadway Segment Level of Service for Near-Term 2023 Plus Project (Phase 1) Conditions with Mitigation

		Before Mitigation measures			After Mitigation measures		
Roadway	Segment	ADT	Cross Section	LOS	ADT	Functional Classification	LOS
Britannia Boulevard	SR-905 EB Ramps to Airway Road	54,440	5-Ln w / RM (2-NB, 3-SB)	**F**	54,440	6-Ln Prime Arterial	D
Airway Road	Cactus Road to Britannia Boulevard	13,000	2-Ln	**F**	13,000	4-Ln Collector	D
	Britannia Boulevard to 1,600 feet west of La Media Road	8,810	2-Ln	**F**	8,810	2-Ln w/ CLTL	C

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
RM = Raised Median.
(Chen Ryan, 2019, Table 7.4)

Ramp Metering Delay– Near-Term 2023 Plus Project (Phase 1)

As previously noted, ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results were not included in this scenario and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 13)

Freeway Segment Level of Service – Near-Term 2023 Plus Project (Phase 1)

As previously shown in Table 19, all of the study area freeway segments would operate at an acceptable LOS during the peak hours under Near-Term 2023 Plus Project (Phase 1) conditions and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 101)

Near-Term 2027 Plus Project (Full Development)

Intersection Level of Service – Near-Term 2027 Plus Project (Full Development)

As shown in Table 30, *Intersection Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions with Mitigation*, with implementation of Project-specific Mitigation Measure MM-35 , the intersection of Britannia Boulevard at Airway Road (Intersection #11) would operate at an acceptable LOS D during the AM and PM peak hours under Near-Term 2027 Plus Project (Full Development) conditions and impacts would be reduced to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 132)

Table 30 Intersection Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions with Mitigation

			Before Mitigation measures				After Mitigation measures			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
ID	Intersection	Control Type	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
11	Britannia Boulevard / Airway Road	Signalized	69.1	**E**	76.8	**E**	38.7	D	54.4	D

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
(Chen Ryan, 2019, Table 9.5)

Roadway Segment Level of Service– Near-Term 2027 Plus Project (Full Development)

As shown in Table 31, *Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions with Mitigation,* with implementation of Project-specific Mitigation Measure MM-36, the roadway segment of Airway Road between Cactus Road to Britannia Boulevard would operate at an acceptable LOS C under Near-Term 2027 Plus Project (Full Development) conditions and impacts would be reduced to a level below significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 131)

Ramp Metering Delay – Near-Term 2027 Plus Project (Full Development)

As previously noted, ramp meters are currently installed but not in operation within the Project's study area. Therefore, ramp metering delay results were not included in this scenario and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 13)

Table 31 Roadway Segment Level of Service for Near-Term 2027 Plus Project (Full Development) Conditions with Mitigation

Roadway	Segment	Before Mitigation measures			After Mitigation measures		
		ADT	Cross Section	LOS	ADT	Functional Classification	LOS
Airway Road	Cactus Road to Britannia Boulevard	18,120	4-Ln	F	18,120	4-Ln Collector w/ CLTL	C

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
CLTL = Continuous-Left-Turn Lane.
RM = Raised Median.
(Chen Ryan, 2019, Table 9.4)

Freeway Segment Level of Service – Near-Term 2027 Plus Project (Full Development)

As previously shown in Table 22, all of the study area freeway segments would operate at an acceptable LOS during the peak hours under Near-Term 2027 Plus Project (Full Development) conditions and no mitigation is required. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 133)

Buildout of Community Plan Plus Project (Full Development)

Intersection Level of Service – Buildout of Community Plan Plus Project (Full Development)

The LOS deficiencies at the following intersections were previously disclosed in the OMCPU EIR and the Project's contribution to the cumulative impacts at these intersections does not represent a new impact that was not previously disclosed in the OMCPU EIR. As shown in Table 32, *Intersection Level of Service for Buildout of the Community Plan Plus Project (Full Development) Conditions with Mitigation*, with implementation of Project-specific Mitigation Measures MM-43, the following intersections would operate at an acceptable LOS. Accordingly, the Project would not result in any impacts at the following intersections under Buildout of Community Plan Plus Project (Full Development) conditions that were not already disclosed in the OMCPU EIR.:

- Otay Mesa Road / Britannia Boulevard (Intersection #8)

Although the intersection listed below was not specifically analyzed in OMCPU EIR, the OMCPU EIR determined that all studied intersections along the length of Airway Road, including intersections along segments both east and west of Intersection #16 would operate at a deficient LOS when considering future year traffic volumes. In addition, the OMCPU EIR and the traffic report appended to the OMCPU EIR contained diagrams that disclosed the expected future year traffic volumes along Airway Road which could not be accommodated at an acceptable LOS by the improvements (e.g., number of travel lanes) that existed along Airway Road at the time the OMCPU EIR was written. With implementation of Mitigation Measure MM-49, Intersection #16 would operate at LOS D during the AM peak hour and LOS B during PM peak hour. Accordingly, the Project would not cause or substantially contribute to a new impact that was not previously disclosed in the OMCPU EIR.

Table 32 Intersection Level of Service for Buildout of the Community Plan Plus Project (Full Development) Conditions with Mitigation

			Before Mitigation measures				After Mitigation measures			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
ID	Intersection	Control Type	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
2	Caliente Avenue / SR-905 EB Ramps	Signalized	170.0	F	151.1	F	58.4	E	46.8	D
3	Caliente Avenue / Airway Road	Signalized	179.0	F	103.4	F	177.1	F	94.2	F
4	Innovative Drive / Otay Mesa Road	Signalized	42.5	D	103.6	F	32.6	C	69.9	E
5	Heritage Road / Otay Mesa Road	Signalized	452.8	F	384.6	F	389.0	F	237.2	F
6	Cactus Road / Otay Mesa Road	Signalized	367.5	F	245.9	F	157.1	F	177.5	F
7	Cactus Road / Airway Road	Signalized	256.5	F	393.9	F	138.0	F	252.9	F
8	Britannia Boulevard / Otay Mesa Road	Signalized	69.3	E	50.0	D	54.9	D	54.6	D
9	Britannia Boulevard / SR-905 WB Ramps	Signalized	222.2	F	380.4	F	75.8	E	273.5	F
10	Britannia Boulevard / SR-905 EB Ramps	Signalized	386.9	F	255.0	F	335.4	F	104.1	F
11	Britannia Boulevard / Airway Road	Signalized	623.6	F	471.9	F	313.2	F	261.6	F
13	La Media Road / Otay Mesa Road	Signalized	343.6	F	256.3	F	150.2	F	118.6	F
14	La Media Road / Airway Road	Signalized	332.9	F	322.2	F	173.4	F	206.5	F
16	Village Way / Airway Road	Signalized	N/A[1]	F	N/A[1]	F	43.1	D	13.9	B
17	Cactus Road / Street "D"	Signalized	N/A[1]	F	500.3	F	8.5	A	16.8	B
18	Cactus Road / Central Main Street	Signalized	N/A[1]	F	N/A[1]	F	37.1	D	20.0	B
19	Cactus Road / Street "C"	Signalized	N/A[1]	F	N/A[1]	F	18.8	B	18.5	B
20	Cactus Road / Siempre Viva Road	Signalized	46.1	D	264.6	F	45.6	D	206.3	F
21	Britannia Blvd / Siempre Viva Road	Signalized	265.5	F	246.4	F	109.8	F	145.6	F

Table 32 Intersection Level of Service for Buildout of the Community Plan Plus Project (Full Development) Conditions with Mitigation (Cont'd)

ID	Intersection	Control Type	Before Mitigation measures				After Mitigation measures			
			AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
			Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS	Avg. Delay (sec)	LOS
22	La Media Road / Siempre Viva Road	Signalized	462.8	F	257.2	F	79.1	E	27.8	C
24	Heritage Road / Datsun Street	Signalized	502.5	F	635.8	F	241.3	F	370.7	F

Source: Chen Ryan Associates; February 2019

Notes:
Bold letter indicates substandard LOS.
(Chen Ryan, 2019, Table 11.6)

- Village Way / Airway Road (Intersection #16)

Although the intersections listed below were not specifically analyzed in OMCPU EIR, the OMCPU EIR determined that all studied intersections along the length of Cactus Road, including intersections along segments both north and south of Intersections #17, #18, and #19 would operate at a deficient LOS when considering future year traffic volumes. In addition, the OMCPU EIR and the traffic report appended to the OMCPU EIR contained diagrams that disclosed the expected future year traffic volumes along Cactus Road which could not be accommodated at an acceptable LOS by the improvements (e.g., number of travel lanes) that existed along Cactus Road at the time the OMCPU EIR was written. With implementation of the traffic signals identified in Mitigation Measures MM-50 through MM-52, Intersections #17, #18, and #19, respectively, the following intersections would operate at an acceptable LOS; however, consistent with the findings of the OMCPU EIR, the Project's impacts to the following intersections would be considered significant and unavoidable until the improvements listed in Mitigation Measures MM-50 through MM-52 are in place. Accordingly, because the Project's impact would be consistent with what as disclosed by the OMCPU EIR, the Project would not cause or substantially contribute to a new impact that was not previously disclosed in the OMCPU EIR.

- Cactus Road / Street "D" (Intersection #17)
- Cactus Road / Central Main Street (Intersection #18)
- Cactus Road / Street "C" (Intersection #19)

As shown in Table 32, with implementation of Project-specific Mitigation Measures MM-37 through MM-42, MM-44 through MM-48, and MM-53 through MM-56, the following intersections would continue to operate at a deficient LOS under OMCPU buildout conditions. Accordingly, because the Project's impact would be consistent with what as disclosed by the OMCPU EIR, the Project would not cause or substantially contribute to a new impact that was not previously disclosed in the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 186)

- Caliente Avenue / SR-905 EB Ramps (Intersection #2)
- Caliente Avenue / Airway Road (Intersection #3)
- Innovative Drive / Otay Mesa Road (Intersection #4)
- Heritage Road / Otay Mesa Road (Intersection #5)
- Cactus Road / Otay Mesa Road (Intersection #6)
- Cactus Road / Airway Road (Intersection #7)
- Britannia Boulevard / SR-905 WB Ramps (Intersection #9)
- Britannia Boulevard / SR-905 EB Ramps (Intersection #10)
- Britannia Boulevard / Airway Road (Intersection #11)
- La Media Road / Otay Mesa Road (Intersection #13)
- La Media Road / Airway Road (Intersection #14)
- Cactus Road / Siempre Viva Road (Intersection #20)
- Britannia Boulevard / Siempre Viva Road (Intersection #21)
- La Media Road / Siempre Viva Road (Intersection #22)
- Heritage Road / Datsun Street (Intersection #24)

Consistent with the findings of the OMCPU EIR, under Buildout of Community Plan Plus Project (Full Development) conditions, the following intersection would operate at LOS F during AM and PM peak hours:

- Heritage Road at Avenida De Las Vistas (Intersection #23).

The above-listed intersection is assumed to be built up to its ultimate classification as identified in the OMCPU; thus, no additional mitigation measures (i.e., construction of improvements or fair share payments) would be recommended due to various factors such as adjacency to environmentally sensitive land and/or steep hillsides, and/or multi-modal and urban design context. Consistent with the findings of the OMCPU EIR, the Project's impacts to the intersection of Heritage Road at Avenida De Las Vistas would be significant and unavoidable; however, because the Project would generate less traffic than was assumed for the Project site by the OMCPU EIR, Project impacts to this intersection would be less than was disclosed by the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 184)

Roadway Segment Level of Service – Buildout of Community Plan Plus Project (Full Development)

Consistent with the findings of the OMCPU EIR, under Buildout of Community Plan Plus Project (Full Development) conditions, all roadway segments significantly impacted by the Project would operate at a deficient LOS. All of the Project's impacted roadway segments are assumed to be built up to its ultimate classification as identified in the OMCPU; thus, no additional mitigation measures would be recommended due to due to various factors such as adjacency to environmentally sensitive land and/or steep hillsides, and/or multi-modal and urban design context. Consistent with the findings of the OMCPU EIR, the Project's impacts to roadway segments would be significant and unavoidable; however, impacts to these roadway segments would be less than was assumed by the OMCPU EIR because the Project would generate less traffic than assumed for the Project site by the OMCPU. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, pp. 176-178)

Ramp Metering Delay – Buildout of Community Plan Plus Project (Full Development)

Consistent with the findings of the OMCPU EIR, under Buildout of Community Plan Plus Project (Full Development) conditions, the following on-ramp would experience delays greater than 15 minutes:

- SR-905 / Britannia Blvd WB On-Ramp (PM).

The downstream freeway segment of Westbound SR-905 between Heritage Road and Britannia would operate at LOS A in the PM peak hour (as shown in Table 27); thus, impacts to the SR-905 / Britannia Blvd WB on-ramp would less-than-significant under Buildout of Community Plan Plus Project (Full Development) conditions and mitigation would not be required. It should be noted that the OMCPU EIR disclosed that this segment of freeway on-ramps would operate at delays over 15 minutes, and disclosed impacts to this location as a significant and unavoidable impact of the OMCPU. The Project would produce less traffic than was assumed by the OMCPU EIR; thus, the Project's impacts to the above-listed on-ramp would be less than was disclosed by the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 173)

Freeway Segment Level of Service – Buildout of Community Plan Plus Project (Full Development)

Consistent with the findings of the OMCPU EIR, under Buildout of Community Plan Plus Project (Full Development) conditions, with implementation of the Project, the following freeway segments would operate at a deficient LOS.

- SR-905, between I-805 and Caliente Avenue – LOS F in the EB direction; and
- SR-905, between I-805 and Caliente Avenue – LOS F in the WB direction.

Neither Caltrans nor SANDAG have plans to construct additional lanes on State Route 905, nor is there a plan or program in place into which the Project could pay its fair-share towards the cost of such mitigation measures. Therefore, mitigation measures are considered infeasible and the impacts along SR-905 would remain significant and unavoidable. Consistent with the findings of the OMCPU EIR, the Project's impacts to the above-listed freeway segments would be significant and unavoidable; however, impacts to these freeway segments would be less than was assumed by the OMCPU EIR because the Project would generate less traffic than assumed for the Project site by the OMCPU. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Chen Ryan, 2019, p. 186)

Would the Project result in an increase in traffic hazards for motor vehicles, bicyclists, or pedestrians?

OMCPU EIR

The OMCPU EIR found that roadway improvements associated with the buildout of the OMCPU would be constructed in accordance with City design standards and applicable OMCPU policies. Therefore, the OMCPU EIR concluded that impacts associated with traffic hazards for motor vehicles,

bicyclists, and pedestrians would be less than significant. (City of San Diego, 2014b, pp. 5.12-48 and 5.12-49)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Consistent with the findings of the OMCPU EIR, all roadway and intersection improvements proposed as part of the Project would be constructed in accordance with applicable City design standards, as well as the design standards established as part of the OMCPU and CVSP. The Project is fully consistent with the CVSP, which accommodates both vehicular and non-vehicular traffic in a manner that would not result in hazards. For example, the Project would construct Class I bike paths along Airway Road and Central Main Street that would fully separate vehicular and bicycle traffic, and also would construct Class II bike lanes along Airway Road, Cactus Road, and Village Way. Furthermore, and consistent with the CVSP, the Project would be required to provide an extensive pedestrian paseos and trails designed to separate pedestrian traffic from vehicular traffic to the maximum feasible extent. There are no components of the Project that would result in increased traffic hazards for motor vehicles, bicyclists, or pedestrians beyond what was evaluated and disclosed as part of the OMCPU EIR and Addendum No. 408329 prepared for the CVSP. Accordingly, and consistent with the findings of the OMCPU EIR, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the Project create alterations to present circulation movements in the area including effects on existing public access points?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would not create alterations to present circulation movements in the area, and that no existing public access points would be permanently closed. Therefore, the OMPCU EIR concluded that impacts associated with circulation and access would be less than significant with no mitigation required. (City of San Diego, 2014b, p. 5.12-49)

LUMINA PROJECT

No Substantial Change from Previous Analysis. Development of the Project would result in alterations to the existing circulation system through intersection and roadway improvements. Buildout of the Project would result in increased circulation capacity and access for vehicles, bicycles, and pedestrians. The Project proposes vacation of an unnamed road dedicated per Map 1267; however, the unnamed road is unimproved under existing conditions and does not provide public access points. Thus, vacation of the unnamed road would not create alterations to present circulation movements in the area. Consistent with the findings of the OMCPU EIR, the Project would result in temporary closures with detours during construction of street improvements. All temporary closures would be addressed through traffic control plans in accordance with City policy as future construction plans are processed through the City, and this requirement would be implemented by Project-specific Mitigation Measure MM-30. No existing public access points would be permanently closed as part of Project implementation. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated

with altering circulation and emergency access on the Project site. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the Project conflict with the adopted policies, plans, or programs supporting alternative transportation modes? (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?

OMCPU EIR

The OMCPU EIR found that the OMCPU policies would be consistent with the City's General Plan policies supporting alternative transportation modes. Therefore, the OMCPU EIR concluded that there would be no impact and mitigation would not be required. (City of San Diego, 2014b, pp. 5.12-50 through 5.12-52)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The proposed Project would implement the goals and policies of the OMCPU and CVSP with respect to alternative modes of transportation. Consistent with the CVSP, which was adopted to implement the OMCPU, the Project would be required to provide a series of pedestrian paseos and trails, and also would be required to accommodate a transit connection/stop at the intersection of Village Way and Airway Road. Additionally, the Project's future Neighborhood Development Permit applications, which are required by the CVSP, would be reviewed by the City for conformance with applicable goals and policies of the General Plan, OMCPU, CVSP, and all applicable ordinances, policies, and plans related to alternative transportation modes. Furthermore, the future site-specific discretionary actions associated with buildout of the proposed Project also would be conditioned to comply with all applicable plans supporting alternative transportation. Finally, the future site-specific discretionary actions associated with the buildout of the proposed Project would be conditioned to comply with the design standards and policies in the CVSP's Mobility Element (Section 2.3), which support alternative transportation modes, and are in conformance with the adopted plans, policies, and programs supporting alternative transportation modes. Thus, the Project would comply with adopted policies, plans, and programs supporting alternative transportation modes, and a less-than-significant impact would occur. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have no impact associated with a conflict with an applicable plan, policy, or program supporting alternative transportation modes nor would the Project otherwise decrease the performance or safety of such facilities. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

PUBLIC SERVICES

In order to maintain acceptable service ratios, response times, or other performance objectives, would the Project 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?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would increase the demand for all public services, including fire protection, police protection, schools, parks, and other public facilities, and would result in the need for the construction and operation of new public facilities. The OMCPU EIR found that future development projects associated with new public facilities would be subject to separate environmental review and payment of applicable fees. Therefore, the OMCPU EIR concluded that at the program level of analysis used to construct and operate public service facilities, impacts related to the construction of new public facilities, including fire protection, police protection, schools, parks, and other public facilities, would be less than significant. (City of San Diego, 2014b, pp. 5.13-20 through 5.13-30)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project proposes development of up to 1,868 multi-family dwelling units, 62,525 s.f. of commercial uses, 6.1 acres of recreational uses, and 6.3 acres for a school/recreation facilities site. As noted in the OMCPU EIR, buildout of the OMCPU, including the Project, would increase demand for all public facilities. The proposed Project's impacts on public services, including fire protection, police protection, schools, parks, and other public facilities, are discussed below.

Fire Protection

Buildout of the proposed Project would increase demand for fire protection and would contribute to the need for new or altered facilities. The OMCPU EIR disclosed that under existing conditions, fire services in the Project area currently are provided by Fire Station No. 29, located approximately 2.7 miles to the west of the Project site. As noted in the OMCPU EIR, one new firefighter is needed for every 1,000 persons. Buildout of the Project would result in a future population of 6,445 residents, which would result in the need for approximately seven new firefighters (6,445 residents /1,000 persons = 6.4 firefighters). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU EIR; thus, the Project would result in decreased demand for fire protection services as compared to what was evaluated and disclosed as part of the OMCPU EIR. (City of San Diego, 2014b, p. 5.13-21)

The OMCPU EIR also notes that there are two new fire stations planned to serve the OMCPU area. A new fire station (No. 49) is planned at the northwest corner of Otay Mesa Road and Ocean View Hills Parkway, while another approximately 10,000 square-foot combined fire and police rescue facility is planned approximately 0.5 mile east of the Project site at the intersection of Siempre Viva Road and Britannia Boulevard. (City of San Diego, 2014b, p. 5.13-2) As noted in the OMCPU EIR, the Project would be subject to payment of Public Facilities Financing Plan (PFFP) fees, portions of which will be used by the City to construct the fire station as the need arises. Although the proposed Project would increase the demand for fire protection services, the construction and operation of new fire protection facilities would be subject to separate environmental review that will be conducted by the

City of San Diego once precise development plans for the new fire station have been prepared. As such plans are not currently available, it would be speculative to determine impacts associated with development of the new fire station at this time (CEQA Guidelines § 15145). Accordingly, Project impacts due to the need for new or expanded fire protection facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU EIR. (City of San Diego, 2014b, p. 5.13-21)

Police Protection

Buildout of the proposed Project would increase demand for police protection and would contribute to the need for new or altered facilities. The city-wide goal for staffing ratio for police officers to population is 1.45 officers per 1,000 residents. Implementation of the Project would result in a future population of approximately 6,445 residents, which would generate a demand for approximately nine new police officers (6,445 residents/1,000 persons x 1.45 peace officers = 9.3 police officers). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU EIR; thus, the Project would result in decreased demand for police protection services as compared to what was evaluated and disclosed as part of the OMCPU EIR. (City of San Diego, 2014b, p. 5.13-22)

According to the OMCPU EIR, the construction of a 10,000 square foot combined fire and police rescue facility located approximately 0.5 miles east of the Project site is planned to meet acceptable service levels in the Project area. As noted in the OMCPU EIR, the Project would be subject to payment of PFFP fees, portions of which will be used by the City to construct the combined police and fire rescue facility as the need arises. Although the proposed Project would increase the demand for police protection services, the construction and operation of new public facilities would be subject to separate environmental review and payment of applicable fees that will be conducted by the City of San Diego once precise development plans for the new combined fire and police rescue facility have been prepared. As such plans are not currently available, it would be speculative to determine impacts associated with development of the new combined fire and police rescue facility at this time (CEQA Guidelines § 15145). Accordingly, Project impacts associated with the need for new or expanded police protection facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU EIR. (City of San Diego, 2014b, p. 5.13-22)

Schools

Buildout of the proposed Project would result in additional demands on school services and would contribute to the need for new facilities. As indicated in Table 33, *Projected Project Student Population*, and based on the student generation rates shown in OMCPU EIR Table 5.13-6 for the San Ysidro and Sweetwater School Districts, the Project is projected to generate approximately 1,013 K-8 students and 219 high school students per year. Thus, the Project would contribute to the need for new or expanded school facilities. However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU EIR; thus, the Project would result in decreased demand for school services and facilities as compared to what was evaluated and disclosed as part of the OMCPU EIR. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24)

Table 33 Projected Project Student Population

School Level	Student Generation Rate (Multi-Family)	Number of Units	Number of Students
K-8	0.5424	1,868	1,013
9-12	0.1171	1,868	219
	Totals:	**1,868**	**1,232**

(City of San Diego, 2014b, Table 5.13-6)

The Project accommodates a 6.3-acre area which is a portion of a larger 13.1-acre designated by the CVSP for an elementary school site. Development of the on-site portions of the school site is inherent to the Project and was evaluated as a future school site by the OMCPU EIR and Addendum No. 408329. There are no impacts associated with future development of the on-site school site that have not already been evaluated and disclosed. Additionally, applicable Mitigation Frameworks from the OMCPU EIR would apply to future development of the school site, in addition to the Project-specific mitigation measures listed in Section VI. of this EIR Addendum. As such, development of the on-site school site would result in less-than-significant impacts to the environment following implementation of applicable OMCPU EIR Mitigation Frameworks and Project-specific mitigation. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24)

Although the Project accommodates a portion of the future school site that ultimately would serve students generated by the Project, the Project would nonetheless increase the demand in the local area for new or expanded school facilities. However, the Project Applicant would be required to contribute fees in accordance with Senate Bill 50 (SB 50), which would be used by the local school districts to fund the construction or expansion of needed school facilities. Pursuant to the Leroy F. Greene School Facilities Act of 1998 (SB 50), payment of school impact fees constitutes complete mitigation under CEQA for impacts to school services and facilities. Therefore, impacts associated with school facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU EIR. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24)

Parks

Buildout of the proposed Project would result in the demand for new park facilities due to the increased population in the Project area. The OMCPU requires 2.8 acres of parkland per 1,000 residents. Because the Project would generate approximately 6,445 residents, the Project would generate a demand for approximately 18.05 acres of parkland (6,445 residents x 2.8 acres / 1,000 residents = 18.0 acres of parkland). However, and as noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU EIR; thus, the Project would result in decreased demand for park and recreation facilities as compared to what was evaluated and disclosed as part of the OMCPU EIR. Additionally, and consistent with the OMCPU and CVSP, the proposed Project accommodates 6.6 acres of land for population-based parks and 3.3 acres for open space uses, while a portion (approximately 11.4 acres) of the Project's parkland demand is intended to be accommodated by the Grand Park, which is planned by the OMCPU off-site at the southeastern corner of Cactus Road and Airway Road. Thus, adequate park facilities have been planned in the local area to serve future residents of the proposed Project, and no additional parkland would be needed beyond what has already been planned. Development of park facilities on the Project site and at the Grand Park were evaluated as part of the OMCPU EIR and/or Addendum No. 408329. Development of these facilities would be

subject to the Mitigation Frameworks identified by the OMCPU EIR, which were identified to reduce to the maximum feasible extent impacts associated with parkland development both within the Project site and in the Grand Park. For development of the on-site parks, the Project-specific mitigation measures listed in Section VI. of this EIR Addendum also would apply. Furthermore, development of the Grand Park would be subject to a separate CEQA review process once precise plans for development of this facility are known. There are no components of the proposed Project that would result in increased impacts due to the construction or expansion of recreational facilities beyond what was already evaluated and disclosed by the OMCPU EIR, Addendum No. 408329, and throughout this document. Therefore, impacts associated with the construction of new or expanded park and recreation facilities would be less than significant.

Other Public Facilities

As noted in Addendum No. 408329, buildout of the CVSP, including the Project, would result in fewer residents than was assumed for the site as part of the OMCPU EIR; thus, the Project would result in decreased demand for library facilities as compared to what was evaluated and disclosed as part of the OMCPU EIR. As noted in the OMCPU EIR, 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 OMCPU area, also is available for the residents of the Otay Mesa community. The OMCPU states that as the community further develops, a library facility would be provided within the OMCPU area. Although the specific location for this facility has not yet been determined, the OMCPU identifies a "Future Library Placeholder" located approximately 2.5 miles northwest of the Project site (City of San Diego, 2014a, PF-8 and Figure 6-1). As the precise location for this facility has not yet been identified, it would not be possible to evaluate impacts that may be associated with construction of this new facility (CEQA Guidelines § 15145). The proposed library facility has been planned to meet the needs of the projected OMCPU residents, including residents within the CVSP, and would be funded as part of the PFFP. The Project Applicant would be required to contribute PFFP fees, portions of which will be used by the City to construct the library facility as the need arises. Therefore, Project impacts associated with the construction or expansion of library facilities would be less than significant and would be reduced compared to what was evaluated and disclosed by the OMCPU EIR.

Summary

As demonstrated above, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impacts associated with the construction of new or expanded public facilities. Additionally, because the Project proposes fewer dwelling units than was assumed for the Project site by the OMCPU EIR, the Project would result in decreased impacts associated with the provision of public services and facilities. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

UTILITIES AND SERVICE SYSTEMS

Would the Project 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.

OMCPU EIR

The OMCPU EIR found that water, wastewater, reclaimed water, storm water infrastructure, and communication systems associated with the buildout of the OMCPU would not result in significant impacts to the environment. In regards to solid waste, the OMCPU EIR found that implementation of the OMCPU would result in potentially significant impacts because the OMCPU EIR could not guarantee at the program-level that all future projects would attain the 75 percent state-mandated diversion rate. The OMCPU EIR identified Mitigation Framework UTIL-1 to reduce potential impacts, which requires that future development projects that generate 60 tons or more of solid waste prepare a Waste Management Plan (WMP). The OMPCU EIR found that even with implementation of mitigation framework UTIL-1 and compliance with the Storage, Recycling, and C&D ordinances, impacts related to solid waste to meet the diversion requirement cannot be assured at the program-level. Therefore, the OMCPU EIR concluded that further evaluation would be required at the project level to identify additional mitigation measures to reduce significant impacts. As such, the OMCPU EIR disclosed that impacts associated with solid waste were significant and unavoidable and a statement of overriding considerations was adopted.

LUMINA PROJECT

Water

No Substantial Change from Previous Analysis. Under existing conditions, the Project site is located within the Otay Water District (OWD) service area. The OWD's water system model was updated in 2010 as part of the 2010 Water Resources Master Plan (WRMP) Update, which included potable water demands anticipated with implementation of the OMPCU. As discussed in the OMCPU EIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-18). As noted in the Sub-Area Waster Master Plan prepared for the Project (*Appendix I*) water service to the Project site would be provided via existing water lines located in Airway Road and Cactus Road. In order to provide water service to the southern half of the Project site, the Project would construct 12-inch water lines on-site extending east to an existing 12-inch OWD water line at the intersection of Central Main Street and Cactus Road and to an existing 12-inch OWD water line at the intersection of Street "C" and Cactus Road. Water service would be provided to the northern half of the Project site through construction of 16-inch water lines on-site extending east to existing parallel 14-inch and 16-inch OWD mains underneath Airway Road. (CH2M, 2018a, Figure 3-2) According to the Water Supply Assessment Review Letter prepared for the Project (*Appendix K*), buildout of the Project is calculated to demand an average of 0.53 million gallons per day (mgd), which would be consistent with the assumptions for the Project site in Addendum No. 408329 and below the assumptions for the Project site in the OMCPU EIR. The OMCPU EIR determined that implementation of the OMCPU (including the Project) would not exceed the capacity of the existing mains within Airway and Cactus Road. Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with water system improvements would be less than significant. Therefore, implementation of the proposed

Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Wastewater

No Substantial Change from Previous Analysis. The City of San Diego would provide sanitary sewer service for the Project site via development of a new on-site sewer collection system and connections to the Otay Mesa Trunk Sewer system. As discussed in the OMCPU EIR, The Project proposes construction of sewer lines on-site that would connect to existing and proposed off-site facilities. The Project's Tentative Map and Sewer Study (*Technical Appendix J*) evaluate development of the on-site sewer system along Street C between Village Way and Cactus Road at a maximum depth of 20 feet in order to be consistent with the City Design Guide for public sewer system design. In addition, the Project's Sewer Study (*Technical Appendix J*) evaluates two sewer alternatives that would result in development of the sewer system along Street C between Village Way and Cactus Road at depths inconsistent with the City Design Guide for public sewer system design. In the event that one of the sewer system alternatives is proposed during final engineering of the Project, additional review and approval from City staff would be required. On-site sewer system depths on the remainder of the Project site would be consistent with the City Design Guide for public sewer design and no additional alternatives are evaluated. Flows in the northern half of the Project site would flow from the proposed on-site sewer lines to existing sewer facilities in Cactus Road at the intersection with Airway Road. Flows in the southern half of the Project site would flow from the proposed on-site sewer lines to a new proposed off-site 18-inch sewer main in Cactus Road between proposed Street "C" and Siempre Viva Road. The proposed 18-inch sewer main would connect to existing Sewer Pump Station 23T. The Project would also include construction of a 24-inch sewer force main off-site within Cactus Road that would connect to existing Sewer Pump Station 23T. The installation of sewer lines on-site as proposed by the Project would result in physical impacts to the surface and subsurface of infrastructure alignments. These impacts are considered to be part of the Project's construction phase and are evaluated throughout this document accordingly. Furthermore, all proposed off-site sewer facilities would be constructed within existing ROW and no additional environmental impacts would occur. The construction of wastewater lines as necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this document or by the OMCPU EIR. As such, impacts would be less than significant. (CH2M, 2019)

According to the Sewer Study prepared for the Project (*Appendix J*), buildout of the Project is calculated to demand an average of 0.52 mgd, which would be within the assumptions for the Project site in the Addendum and below the assumptions for the Project site in the OMCPU EIR. The OMCPU EIR determined that additional wastewater system improvements beyond what have been identified in master planning documents would be required in the OMCPU area. However, the need for these improvements would not result in any new 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 in the area. Additionally, the OMCPU EIR notes that the additional improvements would occur within existing utility line easements and the facilities would not result in significant impacts to the environment. (CH2M, 2019)

Based on the foregoing analysis and consistent with the findings of the OMCPU EIR, the Project would not require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities not previously analyzed, the construction of which would cause significant environmental effects, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously-identified significant impact as analyzed in the OMCPU EIR.

Reclaimed Water

No Substantial Change from Previous Analysis. Under existing conditions, the Project site is located within the OWD service area and would receive recycled water from OWD water facilities (City of San Diego, 2014b, p. 5.14-18). The OWD currently operates a 1.2-mgd reclamation plant and has an agreement to purchase up to 6 mgd of recycled water from the City. The OWD's 2008 WRMP included recycled water projections under the adopted community plan, and the 2010 WRMP incorporated projections under the OMCPU. The OMCPU 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 (City of San Diego, 2014b, p. 5.14-18). As discussed in the OMCPU EIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-18). Improvements to the recycled water systems have been previously identified, and would be required whether or not the OMCPU, including the Project, is implemented. There are no changes proposed as part of the Project that would result in new or more severe impacts due to reclaimed water beyond what was evaluated in the OMCPU EIR. Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with recycled water system improvements would be less than significant. Based on the foregoing analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Solid Waste

No Substantial Change from Previous Analysis. In accordance with OMCPU EIR Mitigation Framework UTIL-1, a Project-specific WMP (*Appendix L)* was prepared by T&B Planning, Inc. for the Project, and future development associated with the Project would be required to implement the recommendations of the WMP in accordance with Project-specific Mitigation Measures MM-58 through MM-61 (refer to Section VI. of this EIR Addendum). Impacts associated with solid waste would occur if the Project would require a new solid waste facility or if the Project would not meet the 75 percent solid waste diversion rate as mandated by AB 341.

Solid waste generated by the Project site during construction and operation would be disposed of either the Miramar Landfill, Sycamore Sanitary Landfill, or the Otay Landfill. The Miramar Landfill is located approximately 21.6 miles northwest of the Project site, with a daily permitted capacity of 8,000 tons per day (tpd). The Sycamore Sanitary Landfill is located 20.3 miles northwest of the Project site, with a daily permitted capacity of 5,000 tpd. The Otay Landfill is located approximately 3.0 miles northwest of the Project site, with a daily permitted capacity of 6,700 tpd. (CalRecycle, 2018)

Demolition waste associated with the proposed Project would generate approximately 3,775 tons of debris. The WMP identifies disposal methods for each type of debris, and includes diversion rates. With implementation of Project-specific Mitigation Measures MM-58 through MM-61 (refer to Section VI. of this EIR Addendum), requiring implementation of the Project's WMP, approximately 99% of the Project's demolition waste would be diverted from the landfill and would be reused or diverted by salvaging or source separating. Therefore, the Project would exceed the 75% waste reduction requirement for demolition debris. (T&B Planning, 2018, pp. 8-10)

Construction waste associated with future development on the Project site would generate approximately 7,536 tons of waste. The WMP also identifies disposal methods for each type of debris and includes estimated diversion rates. With implementation of Project-specific Mitigation Measures MM-58 through MM-61 (refer to Section VI. of this EIR Addendum), approximately 76.8% of construction-related waste would be diverted from the landfill. Therefore, the Project would exceed the 75% waste reduction requirement for construction debris. (T&B Planning, 2018, pp. 10-14)

According to the solid waste generation rates specified by the OMCPU EIR, residential land uses generate approximately 7.8 pounds of solid waste per unit per day and commercial/retail uses generate approximately 13.0 pounds per 1,000 s.f. per day. The Project would allow for the future development of 1,868 dwelling units and 62,525 s.f. of commercial uses. Accordingly, the Project would generate a total of 2,807 tons of waste per year or 7.7 tpd [(1,868 units x 7.8 pounds per day x 365 days per year x .005 tons = 2,659 tons/year) + (62,525 s.f. x 13 pounds per day x 1,000 s.f. x 365 days per year x 0.0005 tons = 148 tons/year) = 2,807 tons/year] (T&B Planning, 2018, p. 15). The Project's daily solid waste generation would represent 0.1% of the daily capacity at the Miramar Landfill, 0.15% of the daily capacity at the Sycamore Sanitary Landfill, and 0.11% of the daily capacity at the Otay Landfill. Furthermore, the Project would provide recycling services on-site and would be required to participate in the City's recycling programs to reduce the volume of solid waste being delivered to the landfills.

With implementation of Mitigation Framework UTIL-1, compliance with the Project's WMP, implementation of Project-specific Mitigation Measures MM-58 through MM-61 (refer to Section VI. of this EIR Addendum), and mandatory compliance with the Storage, Recycling, and C&D ordinances, the Project would meet the waste diversion requirement and would not exceed the daily capacity of the Miramar Landfill, Sycamore Sanitary Landfill, or Otay Landfill. Accordingly, the Project would be served by landfills with adequate capacity, and impacts would be less than significant. Because the OMCPU EIR determined impacts would be significant and unavoidable, Project impacts would be reduced in comparison to what was evaluated and disclosed by the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Storm Water Drainage Facilities

No Substantial Change from Previous Analysis. Under existing conditions, there are minimal drainage improvements within the Project site boundary. The majority of the Project drains to the south to a steep finger canyon (Wruck Creek) located west of the existing Cactus Road and Siempre Viva Road intersection. Two of the finger canyons drain to sump areas that are collected and drained to the west and discharged downstream within the canyon via an existing RCP storm drain

per City Drawing 23871-21-D. A large portion of the Project area drains to the northwest to a canyon (north tributary of Spring Canyon) on the north side of the proposed Airway Road. A small portion of the Project area (Cactus Road north of Airway Road) drains to the north along Cactus Road and drains into a culvert underneath Cactus Road. After crossing Cactus Road, the runoff confluences with other runoff draining from upstream areas including Caltrans right-of-way and then drains to the upstream point of the North Canyon. (PDC, 2018a, p. 5)

Development on the Project site as called for under the OMCPU and the proposed Project would increase impervious surfaces, resulting in the potential for greater surface runoff and increased demands on existing storm water systems within the OMCPU area as compared to the existing condition. With implementation of the Project, runoff from the Project site would be collected via inlets, pipes, brow ditches, roof drains, and water quality features/detention basins. Project flows would be conveyed via on-site storm drain infrastructure to proposed outfalls in each canyon located adjacent to the proposed detention basins. (PDC, 2018b, p. 1)

Construction of on-site drainage facilities is inherent to the construction phase of the Project, and impacts due to Project construction have been evaluated herein and in the OMCPU EIR and Addendum No. 408329. Impacts were either found to be less than significant, or would be reduced to less-than-significant levels with the implementation of Mitigation Frameworks identified in the OMCPU EIR and/or the Project-specific mitigation measures identified in Section VI. of this EIR Addendum. There would be no environmental impacts associated with the Project's proposed drainage infrastructure that have not already been addressed. Additionally, the Project is required to comply with OMCPU Policies and CVSP Policies (see CVSP Section 2.6.2) to ensure that impacts due to installation of storm water infrastructure would be reduced to below a level of significance. Furthermore, because the Project meets City of San Diego requirements for on-site drainage facilities, the Project would not result in or require expansion of off-site drainage facilities except as may be needed for off-site roadway construction (i.e., Airway Road). Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with storm water facilities would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Communication Systems

No Substantial Change from Previous Analysis. The Project site would be provided cable services by Cox Communications and telephone services by AT&T, which are private companies that would have the capacity to serve the Project area. Additionally, in accordance with Section 144.0240 of the City's Municipal Code, the Project would be required to place privately owned utility systems and service facilities underground. In addition, the installation of new communication systems for future development projects would be within existing or planned roadways; therefore, construction impacts would not be significant. Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with communication system improvements would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. and no further environmental review is necessary for this topic.

WATER SUPPLY

Would the Project affect the ability of the water-serving agencies (City of San Diego, SDCWA, and OWD) to provide water?

OMCPU EIR

The OMCPU EIR found that based on the Water Supply Assessments (WSA) of the City's water suppliers providing service to the OMCPU area, including the Public Utilities Department and OWD, there would be sufficient water supply to serve existing demands and projected demands of the OMCPU. As such, the OMPCU EIR concluded that impacts related to water supply would be less than significant. (City of San Diego, 2014b, pp. 5.15-10 through 5.15-15)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The Project site is located within the OWD service area. According to the OWD WSA prepared for the OMCPU EIR (City of San Diego, 2011b), estimated water supply would meet the projected water demands of the OWD service areas during a normal, single dry year, and multiple dry years over a 20-year period. A WSA Update Letter was prepared for the proposed Project by CH2M in order to evaluate the proposed Project's water supply requirements.

The WSA Review Letter noted that the Project would generate an average annual water demand of approximately 604 acre-feet per year (afy). The Project's proposed demand would be within the demand estimated in Addendum No. 408329 and the demand assumed for the CVSP area by the OMCPU EIR's WSA (City of San Diego, 2011b). The only notable change in water supply from the OMCPU WSA is that the OWD has implemented a moratorium on the use of recycled water in the Otay Mesa area due to the high capital cost to extend recycled water service to the area in an OWD Board action dated July 2, 2014. As a result, the OWD would not require the construction of any recycled water facilities as part of the Project, and therefore all future irrigation would be served from the potable water system. Therefore, based on the findings from the OWD 2015 Urban Water Management Plan (UWMP) and the Water Authority's 2015 UWMP, the proposed Project would result in minor unanticipated demands (as noted above due to the elimination of recycled water irrigation) that could be supplied by the Water Authority's Accelerated Forecasted Growth supply (OWD, 2016; Water Authority, 2016). (CH2M, 2018b)

Based the foregoing analysis, and on the information contained in the WSAs prepared for the OMCPU EIR, CVSP, and the Project's WSA Review Letter, there is adequate water to serve the proposed Project based on the Project's proposed land uses, which are consistent with the CVSP and would produce less water demand than was assumed for the site by the OMCPU WSA. As such, it can be concluded that there is sufficient water supply to serve the proposed Project. (CH2M, 2018b, p. 4)

Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with the ability of water-serving agencies to provide water would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the

severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project allow for the use of predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would result in the placement of new landscaping throughout the OMCPU area that would require watering for irrigation purposes. However, the OMCPU EIR found that all future development would be required to conform with existing regulations, as well as the General Plan and OMCPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. As such, the OMCPU EIR found that impacts related to the use of non-drought resistant landscaping and excessive water usage for irrigation would be less than significant without mitigation. (City of San Diego, 2014b, pp. 5.15-15 through 5.15-16)

LUMINA PROJECT

No Substantial Change from Previous Analysis. As noted in the OMCPU EIR, the OMCPU would result in the placement of new landscaping that would require watering for irrigation purposes; however, impacts were previously concluded to be less than significant due to future developments requirement to adhere to existing regulations, General Plan, and OMCPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance. In addition, the Project is located within the CVSP, which includes policies and design standards related to landscaping and requires adherence to the CVSP's Plant Palette. The CVSP Plant Palette predominantly includes plant species that are drought tolerant and that were selected to reduce future irrigation demands associated with buildout of the CVSP (T&B Planning, 2017). The Project would be required to adhere to existing regulations, General Plan, OMCPU, CVSP policies related to landscaping, and the CVSP Plant Palette; as such, the Project would not allow for the use of predominantly non-drought resistant landscaping or excessive water usage for irrigation and other purposes, and impacts would be less than significant. Thus, the proposed Project would not result in significant impacts related to use of non-drought resistant landscaping and excessive water usage not previously identified in the OMCPU EIR and no further environmental review is necessary for this topic.

POPULATION AND HOUSING

Would the land use modifications associated with the Project induce substantial population growth in the area?

OMCPU EIR

The OMCPU EIR found that buildout of the OMPCU would result in substantial population growth. However, the OMCPU EIR found that the OMCPU would implement policies contained in SANDAG's RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and the City of San Diego's General Plan by providing a mix of housing types near public transportation,

increase the regional and local supply of housing needed in accordance with SANDAG's regional growth forecast, and focus housing supply within compact villages that would be linked together by public transportation. As such, the OMCPU EIR found that impacts associated with population growth would be less than significant without mitigation. (City of San Diego, 2014b, pp. 5.16-5 through 5.16-8)

LUMINA PROJECT

No Substantial Change from Previous Analysis. As noted in the OMPCU EIR, buildout of the OMCPU, including the Project site, would result in both direct and indirect substantial population growth; however, impacts due to direct and indirect substantial population growth were previously concluded to be less than significant in the OMCPU EIR. The OMCPU EIR found that OMCPU policies implement the SANDAG's RCP (updated and renamed as "San Diego Forward: The Regional Plan," which was approved October, 2015) and the City's General Plan and Housing Element by focusing population growth and housing supply within compact villages. The Project site is located within one of the OMCPU's planned villages. The Project would allow for the development of up to 1,868 dwelling units, which is consistent with the CVSP and represents a slight reduction in dwelling units as compared to what was assumed for the site by the OMCPU EIR. As such, the Project would result in no new significant effects (on-site, off-site, or cumulative) and there is no new information indicating a more severe adverse impact beyond what was disclosed by the OMCPU EIR. Thus, the proposed Project would not result in significant impacts related to substantial population growth not previously identified in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the land use modifications associated with the Project not comply with the City's Inclusionary Affordable Housing Ordinance?

OMCPU EIR

The OMCPU EIR found that approximately 77 percent of the residential dwelling units associated with the buildout of the OMCPU would consist of multi-family units and implementation of the OMCPU Policies 2.2-5 through 2.2-8 would provide affordable housing within the OMCPU area. As such, the OMCPU EIR concluded that the OMPCU would be consistent with federal and state affordable housing, and impacts associated with affordable housing would be less than significant without mitigation.

LUMINA PROJECT

No Substantial Change from Previous Analysis: Consistent with the finding of the OMCPU EIR, the Project accommodates 1,868 multi-family dwelling units with densities ranging from 10-44 du/ac, which would assist the City in providing a range of housing choices affordable to lower-income residents. Land uses proposed by the Project are fully consistent with the General Plan, OMCPU, and CVSP, and no land use changes are proposed as part of the Project. Furthermore, future development on site would be subject to the City's Inclusionary Affordable Housing Regulations (Municipal Code Chapter 14, Article 2, Division 13), which requires either the provision of affordable dwelling units on site or the payment of in-lieu fees. There are no components of the proposed Project that would involve land use modifications or a conflict with the City's Inclusionary Affordable

Housing Ordinance, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

AGRICULTURAL AND MINERAL RESOURCES

Would the land use modifications associated with the Project 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?

OMCPU EIR

The OMCPU EIR concluded that buildout of the OMCPU would convert 180 acres of Farmland of Statewide Importance and 28 acres of Unique Farmland to non-agricultural use, both of which occur within the Central Village area. However, the OMCPU EIR found that 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 were found to have contributed to a significant reduction in future agricultural viability within the OMCPU area. Furthermore, agricultural land in the OMCPU area is intended as an interim, rather than permanent use. The OMCPU allows agriculture as an interim use pending development and the City rezoned the Central Village to an agricultural "holding" zone (AR-1-1) concurrently with adoption of the OMCPU to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to nonagricultural uses were found by the OMCPU EIR to be less than significant. (City of San Diego, 2014b, pp. 4.17-11 and 4.17-12)

LUMINA PROJECT

No Substantial Change from Previous Analysis. According to mapping available from the California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site is identified as containing Farmland of Local Importance, Unique Farmland, Grazing, and Other Lands. Buildout of the Project would convert on-site lands, including areas identified as Unique Farmland and Farmland of Local Importance, to non-agricultural use. (CDC, 2018) However, as noted in the OMCPU EIR, Farmland within the OMCPU area is intended as an interim use. Conversion to urban development is expected upon buildout of the area in accordance with the OMCPU. Additionally, the Project is zoned for residential and commercial mixed uses, recreational, and open space uses, and is not zoned for agricultural uses. As noted by the OMCPU EIR, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts are anticipated to reduce the viability of agricultural activities on site over time. The Project's impacts to Farmland are consistent with the impacts disclosed in the OMCPU EIR, and there are no components of the proposed Project that would result in new or more severe impacts to Farmland either on or off site. Consistent with the findings of the OMCPU EIR, impacts due to the Project's anticipated conversion of Farmland to non-agricultural uses would less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would the Project 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?

OMCPU EIR

The OMCPU EIR concluded that buildout of the OMCPU would convert 180 acres of Farmland of Statewide Importance and 28 acres of Unique Farmland to non-agricultural use, both of which occur within the Central Village area. However, the OMCPU EIR found that 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 were found to have contributed to a significant reduction in future agricultural viability within the OMCPU area. Furthermore, agricultural land in the OMCPU area is intended as an interim, rather than permanent use. The OMCPU allows agriculture as an interim use pending development and the City rezoned the Central Village to an agricultural "holding" zone (AR-1-1) concurrently with adoption of the OMCPU to accommodate continued agricultural operations until such time that a Specific Plan is implemented. Therefore, impacts associated with the conversion of agricultural land to nonagricultural uses were found by the OMCPU EIR to be less than significant. (City of San Diego, 2014b, pp. 4.17-11 and 4.17-12)

LUMINA PROJECT

No Substantial Change from Previous Analysis. As discussed in Threshold a), buildout of the Project would convert on-site lands, including areas identified as Unique Farmland and Farmland of Local Importance, to non-agricultural uses. (CDC, 2018) However, as noted in the OMCPU EIR, Farmland within the OMCPU area is intended as an interim use. Conversion to urban development is expected upon buildout of the area in accordance with the OMCPU. Additionally, the Project is zoned for residential and commercial mixed uses, residential, recreational, and open space uses, and is not zoned for agricultural uses. Consistent with the findings of the OMCPU EIR, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts are anticipated to reduce the viability of agricultural activities on site over time. The Project's impacts to Farmland are consistent with the impacts disclosed in the OMCPU EIR, and there are no components of the proposed Project that would result in new or more severe impacts due to the conversion of farmland to non-agricultural use. Consistent with the findings of the OMCPU EIR, the Project's anticipated conversion of Farmland to non-agricultural uses represent less-than-significant impacts of the proposed Project. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

Would implementation of the Project 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?

OMCPU EIR

The OMCPU EIR found that portions of the OMCPU area are located within Mineral Resource Zone (MRZ)-2 and MRZ-3. MRZ-3 zones are not considered sensitive because they comprise areas that may or may not have mineral resources. However, MRZ-2 lands represent areas containing regionally significant mineral deposits. The OMCPU EIR found that the majority of acreage designated MRZ-2, which occurs in the northernmost portion of the OMCPU area, contains existing residential uses that would be incompatible with the establishment of any new mineral resource operations. In addition, the OMCPU EIR found that the OMCPU area does not include any existing or proposed mining operations, and development associated with buildout of the OMCPU would not result in indirect impacts to any existing extraction operations in the vicinity of the OMCPU. As such, the OMCPU EIR concluded that the ability to extract mineral resources would not be impacted with implementation of the OMCPU. The General Plan and OMCPU also do not identify any portion of the OMCPU as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur. (City of San Diego, 2014b, pp. 5.17-13 through 5.17-15)

LUMINA PROJECT

No Substantial Change from Previous Analysis. The General Plan and OMCPU do not identify the Project site as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur as a result of Project implementation. According to OMCPU EIR Figure 5.17-3, the Project site is located within the MRZ-3 mineral resources zone, which "are areas containing mineral deposits, the significance of which cannot be evaluated from available data" (City of San Diego, 2014b, p. 5.17-10 and Figure 5.17-3). Accordingly, and consistent with the finding of the OMCPU EIR, future development on-site would result in a less-than-significant impact associated with the loss of availability of a known mineral resource 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. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

GREENHOUSE GAS EMISSIONS

In the time following the certification of the OMCPU EIR (2014), the City of San Diego adopted a CAP (December 2015) and an amendment to the CAP to add a Consistency Checklist. For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" as utilized in the OMCPU EIR, is now based on the City's approved CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts. Thus, and consistent with Addendum No. 408329, the threshold utilized in the OMCPU EIR has been replaced with a threshold that specifically references the City's CAP as the applicable plan for reducing GHG emissions in the City of San Diego.

Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would reduce greenhouse gas (GHG) emissions by between 9.1 and 11.4 percent compared to Business as Usual (BAU), which does not meet the City's goal of a minimum 28.3 percent reduction in emission levels; therefore, the OMCPU EIR found that impacts associated with GHG emissions would be significant. The OMCPU EIR identified Mitigation Framework GHG-2 to reduce impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term operational emissions as identified in Mitigation Framework GHG-1, and to include project-level GHG reduction design features that demonstrate a reduction in GHG emissions to the extent practicable. The OMCPU EIR concluded that even with adherence to Mitigation Framework GHG-2 and compliance with applicable General Plan and OMPCU policies, impacts associated with the contribution of GHG emissions to cumulative statewide emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 5.18-16 through 5.18-26)

LUMINA PROJECT

Construction Emissions

Because the development area assumed by the OMCPU EIR and the development area proposed by the Project are the similar, it is assumed that construction activities associated with buildout of the Project would largely remain the same as assumed by the OMCPU EIR for the Project area. The OMCPU EIR's consideration of construction-related GHG emissions assumed that sources of construction-related emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions associated with the Project. As such, there would be no change in construction-related GHG emissions quantities associated with the Project. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Operational Emissions

The Project evaluated herein consists of a Tentative Map that would not directly authorize development of the site, as implementing development would require approval of a NDP that would identify specific site layout and building design that are not available at the Tentative Map level of review. Notwithstanding, future development anticipated as part of the Project includes up 1,868 multi-family residential dwelling units, 62,525 s.f. of commercial uses, parks, and school uses. The Project proposes fewer residential uses than was assumed for the site by the OMCPU EIR, but would result in a slight increase in commercial area.

The OMCPU EIR concluded that implementation of the OMCPU would result in significant and unavoidable impacts due to greenhouse gas emissions. Consistent with the assumptions for the Project site in the OMCPU EIR for the CVSP, the future development on the Project site would generate operational-related GHG emissions. As previously noted, the Project is within the CVSP area and would be developed in accordance with the CVSP land use assumptions for the site. Thus, the Project's land uses and emissions were included in the scope of analysis conducted for the CVSP as part of Addendum No. 408329. As noted in Addendum No. 408329, buildout of the CVSP (including the proposed Project) would decrease the number of traffic trips anticipated for the Central Village area as compared to what was assumed for the CVSP area by the OMCPU EIR, and, due to an increase in the amount of commercial area in the CVSP as compared to what was assumed by the OMCPU EIR, the Project also would result in a reduction in the number of Vehicle Miles Traveled (VMTs). As a result, the Project would result in a reduction in the amount of vehicular-related GHGs emitted by the site as compared to what was evaluated by the OMCPU EIR.

It should be noted that the proposed Project is a Tentative Map analysis, and specific project-level development plans and their associated design features are not available to analyze at this phase of development; rather, the purpose of this discussion is to determine whether buildout of the proposed Project would result in new or more severe environmental impacts related to GHG emissions as compared to what was evaluated and disclosed for the Project site by the OMCPU EIR and Addendum. The OMCPU EIR concluded that GHG emissions would be generated from development in the OMCPU area, either directly or indirectly, that may have a significant impact on the environment.

Although impacts associated with the contribution of GHG emissions to cumulative statewide emissions were found to be significant and unavoidable by the OMCPU EIR, the City's updated significance threshold enacted pursuant to the CAP (as described in the threshold below) would apply to the currently proposed Project. The significance threshold for GHG emissions based on CAP compliance provides an updated, localized, and comprehensive approach for the assessment of the significance of GHG emissions. As demonstrated in the Project-specific CAP Consistency Checklist (refer to *Appendix A*), the Project is compliant with the CAP and does not conflict with the CAP. The CAP provides a localized evaluation of GHG emissions, and reduction targets and strategies to reduce impacts to cumulative state emissions. Therefore, impacts associated with Project's contribution of GHG emissions to cumulative statewide emissions would be less than significant, because the proposed Project is consistent with the CAP which reduces the cumulative contribution to statewide GHG emissions to less-than-significant levels.

Thus, because the Project is subject to the updated and localized CAP threshold and would reduce the quantity of GHG emissions as demonstrated in the Greenhouse Gas Assessment prepared for Addendum No. 408329, the Project's GHG impacts would be reduced in comparison to what was evaluated and disclosed by the OMCPU EIR. No new impact would occur in comparison to the GHG analysis presented in the OMCPU EIR, and the proposed Project would reduce the OMCPU EIR's significant and unavoidable impact to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the Project conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

OMCPU EIR

Although the OMCPU contains policies that are consistent with the strategies of local and state plans to reduce GHG emissions, the OMCPU EIR found that future development projects may not meet the City's reduction goals associated with achieving the reductions required by AB 32; therefore, the OMCPU EIR found that the OMCPU would have potential to conflict with applicable plans and impacts would be potentially significant at the program-level. The OMCPU EIR identified Mitigation Framework GHG-1 to reduce potential impacts, which requires future development projects to demonstrate avoidance of significant impacts related to long-term GHG emissions by including GHG-reducing features based on a project-specific analysis. The OMCPU EIR concluded that even with adherence to Mitigation Framework GHG-1 and compliance with applicable General Plan and OMPCU policies, impacts related to GHG emissions would be significant and unavoidable. A statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 5.18-12 through 5.8-16)

LUMINA PROJECT

As previously noted at the beginning of this Subsection, in the time following the certification of the OMCPU EIR (2014), the City of San Diego adopted a CAP (December 2015) and an amendment to the CAP to add a Consistency Checklist. For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" is based on the City's approved CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts. Thus, and consistent with Addendum No. 408329, the threshold utilized in the OMCPU EIR has been replaced with a threshold that specifically references the City's CAP as the applicable plan for reducing GHG emissions in the City of San Diego. Determining significance under this threshold for the proposed Project, a discretionary Tentative Map that does not propose specific development, entailed the preparation of "Step 1" of a Climate Action Plan Consistency Checklist. Pursuant to the requirements of the CAP Consistency Checklist, the Project is not subject to "Step 2" of a CAP Consistency Checklist; however, an evaluation of "Step 2" was prepared to indicate that the CAP Strategies were not applicable to the Project and that CAP Strategies would be evaluated concurrent with the processing of a future Neighborhood Development Permit. The CAP Consistency Checklist for the Project is included as *Appendix A.*

The City of San Diego adopted a CAP in December 2015 that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. In accordance with the recommendations from the State of California and the California Air Resources Board, the City's CAP includes a target to achieve a 15 percent reduction from 2010 GHG baseline levels by the year 2020. The CAP also includes the City's 2050 GHG emissions reduction target at 80 percent below the 2010 baseline. The CAP identifies five strategies to reduce GHG emissions to achieve the 2020 and 2050 reduction targets. The five strategies include: energy and water efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist. The Checklist is part of the CAP and contains measures that

are to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development projects are consistent with the CAP's assumptions and relevant CAP strategies to assist the City in achieving its identified GHG reduction targets. Projects that are consistent to conclude that the Project would have less than significant cumulatively considerable GHG emissions impacts under CEQA.

The Project's CAP Consistency Checklist analysis determined that the Project, a discretionary Tentative Map that does not entail specific development, is compliant with the City's CAP. Please refer to *Appendix A* for the Project's full CAP Consistency Checklist. Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, the Project's demonstrated compliance with the CAP indicates that a less than significant GHG impact would occur related to compliance with planning policies and regulations. No new impact would occur in comparison to the GHG analysis presented in the OMCPU EIR, and the proposed Project would reduce the OMCPU EIR's significant and unavoidable impact to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR and no further environmental review is necessary for this topic.

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

The mitigation measures identified below include all applicable measures applicable to the Lumina Project from the Otay Mesa Community Plan Update EIR (Project No. 408329; SCH No. 2004651076) and any site-specific measures applicable pursuant to the OMCPU EIR Mitigation Frameworks. Section 21081.6 to the State of California PRC requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a "reporting or monitoring program for adopted or required changes to mitigate or avoid significant environmental effects." The City of San Diego is the Lead Agency for the Otay Mesa Community Plan Update EIR, and therefore must ensure the enforceability of the MMRP. An EIR and EIR Addendum have been prepared for this project that addresses potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. As such, an MMRP is required to ensure that adopted mitigation measures are implemented. Therefore, the following general measures are included in this MMRP:

OMCPU EIR Applicable Mitigation Measures

LAND USE

Mitigation Framework LU-2: All subsequent development projects that are implemented in accordance with the CPU (CVSP) 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 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 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 overspill 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 byproducts 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.

AIR QUALITY/ODOR

Mitigation Framework 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.

Mitigation Framework 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.

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 of the plan.

Mitigation Framework AQ-4: Prior to the issuance of building permits for any project containing a facility identified in Table 9, California Air Resources Board Land Use Siting Constraints, 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, 2015; OEHHA, 2015). 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 MEIR, and the 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 non-cancer 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.

BIOLOGICAL RESOURCES

Mitigation Framework 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 Community Plan Update (CPU; [CVSP]) area, all subsequent projects

implemented in accordance with the CPU (CVSP) shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City Biology Guidelines (City of San Diego, 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 (CVSP) area, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the Federal Endangered Species Act (FESA), MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act, MSCP Subarea Plan, and Environmentally Sensitive Lands (ESL) Regulations.

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of BUOW on the project site. Future projects shall be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should BUOW habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). Measures to avoid and minimize impacts to BUOW shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (preconstruction) 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 (CVSP) resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the Biology Guidelines and MSCP Subarea Plan (City of San Diego, 1997, Table 5.47; City of San Diego, 2012). 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 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, 2012). 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). If final engineering requirements for Airway Road 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 Short-term Impacts to Sensitive Species from Project Construction.
Specific measures necessary for reducing potential construction-related noise impacts to the CAGN, least Bell's vireo, BUOW, and the cactus wren are further detailed in BIO-2 and LU-2.

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 (CVSP) area, shall be identified in site-specific biological resources surveys prepared in accordance with the Biology Guidelines as further detailed in BIO-1 during the discretionary review process. The biological resources 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 biological resources 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, California Fish and Game Code, and/or the ESL Regulations.

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.

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 Table 3.3-4 of 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.

HISTORICAL RESOURCES

Mitigation Framework 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. Determination of the significance of potential impacts shall occur as set forth in OMCPU EIR Subsection 5.5.3.3.a.

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, archeological 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 Archaeology 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 archeological research in similar areas, models that predict site distribution, and archeological, 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 (City of San Diego, 2001). 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 (City of San Diego, 2001). 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 (City of San Diego, 2001).

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) (SHRC, 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.

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 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;

e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning.

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.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

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 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 145.07 of the LDC, and Chapter 7 of the California Building Code.

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 for discretionary 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.

Mitigation Framework 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.

HYDROLOGY AND WATER QUALITY

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 feasible mitigation measures 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)

- 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.

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 of 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 feasible, 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.

GEOLOGY AND SOILS

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.

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 145.1802 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, 2016).

NOISE

Mitigation Framework 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.

Mitigation Framework NOI-2: When building plans are available and 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.

Mitigation Framework 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.

Mitigation Framework 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.

PALEONTOLOGICAL RESOURCES

Mitigation Framework PALEO-1: Prior to the approval of development projects implemented in accordance with the CPU, the City shall determine, based on review of the project application submitted under CPIOZ TYPE B and recommendations of a project-level analysis of potential impacts on paleontological resources 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 discretionary 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.

TRANSPORTATION/CIRCULATION

Mitigation Framework TRF-1: Intersections shall be improved per the intersection lane designations identified in [OMCPU EIR] Figure 5.12-4.

UTILITIES AND SERVICE SYSTEMS

Mitigation Framework 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.

The above Mitigation Monitoring and Reporting Program will require additional fees and/or deposits to be collected prior to the issuance of building permits, certificates or occupancy and/or final maps to ensure the successful completion of the monitoring program.

GREENHOUSE GAS EMISSIONS

Mitigation Framework GHG-1: Future projects implemented in accordance with the [CVSP] 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 [CVSP] 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. Future projects implemented in accordance with the [CVSP] CPU shall be required to prepare a project-level CAP Consistency Checklist to demonstrate consistency.

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.

Project-Specific Mitigation Measures

The following mitigation measures are required at the Project level as part of above-listed OMCPU EIR Mitigation Measures and are not the result of new or increased impacts as compared to the OMCPU EIR. In accordance with the above-listed OMCPU EIR Mitigation Measures, the following site-specific mitigation measures would apply to the Project.

BIOLOGICAL RESOURCES

MM-1 The Project Applicant shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) Section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the Project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the Project.

MM-2 The Qualified Biologist shall attend a pre-construction meeting, to discuss the Project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

MM-3 The Qualified Biologist shall submit all required documentation to MMC Section verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, Project permit conditions; CEQA; endangered species acts; and/or other local, State or federal requirements.

MM-4 The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the biological documents in MM-3, above. In addition, the Exhibit shall include: restoration/revegetation plans, plant salvage/relocation requirements, avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director/MMC. The Biological Construction Mitigation/Monitoring Exhibit shall include a site plan, written and graphic depiction of the Project's biological mitigation/monitoring program, and a

schedule. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by MMC and referenced in the construction documents.

MM-5 To avoid any direct impacts to raptors and/or any native/migratory birds (specifically including the southern California rufous crowned sparrow and loggerhead shrike that have moderate potential to occur on site), removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur (based on construction timing) during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City Development Services Department for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City Development Services Department for review and approval and implemented to the satisfaction of the City. The City's MMC Section or Resident Engineer, and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the preconstruction survey, no further mitigation is required.

MM-6 Prior to construction activities, the Qualified Biologist shall supervise the placement of silt and orange construction fencing or equivalent along the limits of disturbance and verify compliance with any other Project conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This phase shall include, as applicable, flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the Project site.

MM-7 Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian buffers and clarify acceptable access routes/methods and staging areas, etc.).

MM-8 All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" of the BTR and/or the Biological Construction Mitigation/Monitoring Exhibit. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the preconstruction surveys. In addition, the Qualified Biologist

shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to Mitigation Monitoring Coordination on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery. The Qualified Biologist shall monitor, as is feasible, for the presence of sensitive animal species and shall, if practicable, direct or move these animals out of harm's way (i.e., to a location of suitable habitat outside the impact footprint).

MM-9 The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all Project activities that directly impact the resource shall be delayed until species specific local, State or federal regulations have been determined and applied by the Qualified Biologist. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL Ordinance and MSCP, CEQA, and other applicable local, State and federal laws. The Qualified Biologist shall submit a final Biological Construction Mitigation/Monitoring Exhibit /report to the satisfaction of the City Assistant Deputy Director /MMC within 30 days of construction completion.

MM-10 Prior to the issuance of grading permits, the Project Applicant shall provide evidence to the City's MMC section that impacts to 0.5 acre of Tier I maritime succulent scrub are mitigated through off-site preservation on the Sorenson Mitigation Parcels at a minimum 1:1 ratio; impacts to 3.2 acres of Tier II Diegan coastal sage scrub are mitigated through on- and off-site preservation, with off-site preservation/restoration occurring on the Barton Mitigation Parcels and off-site preservation also occurring on the Sorenson Mitigation Parcels at a minimum of 1:1 ratio; impacts to 0.5 acre of non-native grassland inside the MHPA are mitigated through on-site preservation at a minimum 1:1 ratio with off-site preservation/restoration occurring on the Barton Mitigation Parcels and off-site preservation also occurring on the Sorenson Mitigation Parcels; and impacts to 2.4 acres of non-native grassland outside of the MHPA are mitigated through on- and off-site preservation at a minimum 0.5: 1 ratio. Mitigation shall occur through a combination of on-site preservation and a combination of off-site acquisition and restoration as shown in Addendum Table 4, *Mitigation for Significant Direct Impacts to Vegetation Communities*. All mitigation shall occur through preservation within the MHPA, or through land added to the MHPA.

Additionally, prior to issuance of grading permits, in accordance with the City's Protection and Notice Element, the Project Applicant shall complete the following for the Mitigation Parcels:

1. Barton Mitigation Parcels: The Project Applicant shall record a temporary Covenant of Easement for restoration activities and an Irrevocable Offer to Dedicate for protection from future development. Following the five-year success period required by the City for restoration, the Barton Mitigation Parcels shall be dedicated to the City in fee title. Long-term management of the parcels shall be the responsibility of, and provided by, the City of San Diego.

2. Sorenson Mitigation Parcels: The Project Applicant shall record an Irrevocable Offer to Dedicate for protection from future development. The Sorenson Mitigation Parcels shall be dedicated to the City in fee title. Long-term management of the parcels shall be the responsibility of, and provided by, the City of San Diego.

MM-11 Prior to the issuance of a Notice to Proceed (NTP) or any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the ADD environmental designee of the City's LDR Division shall incorporate the following mitigation measures into the project design and include them verbatim on all appropriate construction documents.

Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check

1. Prior to NTP or issuance for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including mitigation of direct impacts to 0.9 acre of Diegan coastal sage scrub have been shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the Figure 3 of the Coastal Sage Scrub Restoration Plan for the Lumina Tentative Map Project prepared by Alden Environmental, Inc., dated November 30, 2018, the requirements of which are summarized below:

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.

2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (July 2002). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include

comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).

3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120 day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:

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

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

C. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City of San Diego Biological Review References. Resumes and the biology worksheet should be updated annually.

2. MMC will provide a letter to the applicant confirming the qualifications of the PQB/PRS/QBM and all City Approved persons involved in the revegetation/restoration plan and biological monitoring of the project.

3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the revegetation/restoration plan and biological monitoring of the project.

4. PBQ must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

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

1. Prior to beginning any work that requires monitoring:
    a. The owner/permittee or their authorized representative shall arrange and perform a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.
    b. The PQB shall also attend any other grading/excavation related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM and/or GC.
    c. If the PQB is unable to attend the Precon Meeting, the owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/ restoration phase of the project, including site grading preparation.

2. Where Revegetation/Restoration Work Will Occur
    a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.
    b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP's) on the RRME.

3. When Biological Monitoring Will Occur
    a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.

4. PQB Shall Contact MMC to Request Modification
    a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

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

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

2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVR). The CSVR's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.

3. The PQB or QBM shall be responsible for maintaining and submitting the CSVR at the time that CM responsibilities end (i.e., upon the completion of construction activity other then that of associated with biology).

4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.

5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent

to (or at the edge of) the Diegan coastal sage scrub habitat creation area, as shown on the approved LCD.

6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly.

7. The PQB or QBM shall oversee implementation of BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMP's upon completion of construction activities. Removal of temporary construction BMP's shall be verified in writing on the final construction phase CSVR.

8. PQB shall verify in writing on the CSVR's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.

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

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occurs or sensitive biological resources are discovered that where not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to temporarily divert construction in the area of disturbance or discovery and immediately notify the RE or BI, as appropriate.

2. The PQB shall also immediately notify MMC by telephone of the disturbance and report the nature and extent of the disturbance and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMP's). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP's.

3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by fax or email with photos of the resource in context (e.g., show adjacent vegetation).

C. Determination of Significance

1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain

concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.

2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period
    a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
    b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
    c. Maintenance activities will include all items described in the LCD.
    d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC.

2. Five-Year Biological Monitoring
    a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
    b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
    c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
    d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
    e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and

percent cover of non-native/non invasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.

f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth year criteria and the irrigation has been terminated for a period of the last two years.

g. The PQB or QBM shall oversee implementation of post-construction BMP's, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP's upon completion of construction activities. Removal of temporary post-construction BMPs shall be verified in writing on the final post-construction phase CSVR.

C. Submittal of Draft Monitoring Report

1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include discussion on weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of 120 day period to determine mortality of individuals.

2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the owner, RMC and RIC. Site progress reports shall review maintenance activities, qualitative and quantitative (when appropriate) monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.

3. Draft annual reports (three copies) summarizing the results of each progress report including quantitative monitoring results and photographs taken from permanent viewpoints shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.

4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.

5. The PQB shall submit revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.

6. MMC will provide written acceptance of the PQB and RE of the approved report.

D. Final Monitoring Reports(s)

1. PQB shall prepare a Final Monitoring upon achievement of the fifth year performance/success criteria and completion of the five year maintenance period.
    a. This report may occur before the end of the fifth year if the revegetation meets the fifth year performance /success criteria and the irrigation has been terminated for a period of the last two years.
    b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.
    c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM-12 Prior to the issuance of a grading permit, the Project Applicant shall submit evidence to the Assistant Deputy Director of Entitlements verifying that a Biologist possessing qualifications pursuant "Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Game. March 7, 2012 (hereafter referred as CDFG 2012, Staff Report), has been retained to implement a BUOW construction impact avoidance program and conduct a BUOW pre-construction survey, detailed below.

- Construction Impact Avoidance Program: The Qualified BUOW Biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City's BUOW requirements and subsequent survey schedule.

- Pre-Construction Survey: The Project Applicant and the Qualified BUOW Biologist shall ensure that the initial preconstruction/ take avoidance surveys of the Project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading regardless of the time of the year. "Site" means the Project site and the area within a radius of 450 feet of the Project site. The report shall be submitted and approved by the Wildlife Agencies (WAs) and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the Project site and BUOW locations on aerial photos. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report, Appendix D (*note: in 2013, CDFG became California Department of Fish and Wildlife*). 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of pre-construction/take avoidance surveys. Verification shall be provided to the City's MMC Section. If results

of the pre-construction surveys have changed and BUOW are present in areas not previously identified, immediate notification to the City and WAs shall be provided prior to ground disturbing activities.

If BUOWs or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "B" shall be followed. Neither the MSCP subarea plan nor this mitigation section allows for any BUOWs to be injured or killed outside or within the MHPA; in addition, impacts to BUOWs within the MHPA must be avoided.

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

  1) If no active burrows are found but BUOWs are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.

  2) If no active burrows are found but BUOWs are observed during follow-up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's MMC Section shall be notified, and any portion of the site where owls have been observed and that has not been graded or otherwise disturbed shall be avoided until further notice.

  3) If a BUOW begins using a burrow on the site at any time after the initial preconstruction survey, procedures described in Section B must be followed.

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

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

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

  2) If one or more BUOWs are using any burrows (including pipes, culverts, debris piles etc.) on or within 300 feet of the proposed construction area, the City's MMC Section shall be contacted. The City's MMC Section shall contact the Was regarding eviction/collapsing burrows and shall enlist appropriate City biologist

for on-going coordination with the WAs and the Qualified BUOW Biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the WAs. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography and other physical and biological characteristics.

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

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

3) Survey Reporting During Construction - Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's MMC Section and the WAs and must be provided in writing (as by e-mail) and acknowledged to have been received by the required agencies and Development Services Department Staff member(s).

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

MM-13 Best Management Practices shall be employed during grading as BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are BUOW occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs from re-colonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on, and covering rubble piles, dirt piles, ditches, and berms.

MM-14 Due to the potential for the northern harrier and BUOW to nest in the MHPA, a 900-foot impact avoidance area shall be maintained for any active northern harrier nest, and a 300-foot impact avoidance area shall be maintained for any active BUOW burrow in the MHPA.

MM-15 Due to the potential for container stock to be used in on-site habitat restoration to contain Argentine ants, which is a threat to the native ant prey base of the coast horned lizard, all container stock to be used for on-site habitat restoration shall be inspected prior to delivery to the site for the presence of Argentine ants. Only stock that is determined to be

free from Argentine ants shall be used. The Project Construction Contractor shall be responsible for monitoring for compliance with this requirement, and shall permit periodic inspection by the City of San Diego at the City's discretion

MM-16 Prior to issuance of building permits, the City of San Diego MMC Section shall ensure lighting adjacent to the MHPA is directed away/shielded and is consistent with City Outdoor Lighting Regulations per LDC Section 142.0740.

MM-17 Prior to the issuance of any grading permit the City Manager (or appointed designee) will verify that the MHPA boundaries and the following Project requirements regarding the CAGN are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities will occur within 500 feet of the MHPA between March 1 and August 15 (gnatcatcher breeding season) until the following requirements have been met to the satisfaction of the City Manager:

- A. A qualified biologist (possessing a valid FESA Section 10(a)(1)(A) Recovery Permit) shall survey appropriate habitat (coastal sage scrub) areas within the MHPA that lie within 500 feet of the Project footprint and would be subject to construction noise levels exceeding 60 dB hourly average for the presence of the gnatcatcher. If no appropriate habitat is present then the surveys will not be required. If appropriate habitat is present, gnatcatcher surveys shall be conducted pursuant to USFWS protocol survey guidelines within the breeding season prior to commencement of any construction. If gnatcatchers are present within the MHPA, the following conditions must be met:

  I. Between March 1 and August 15, no clearing, grubbing, or grading of occupied CAGN habitat will be permitted within the MHPA. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and

  II. Between March 1 and August 15, no construction activities will occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB hourly average at the edge of occupied CAGN habitat within the MHPA. An analysis showing that noise generated by construction activities would not exceed 60 dB hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to commencement of construction activities during the breeding season, areas restricted from such activities will be staked or fenced under supervision of a qualified biologist; or

  III. At least two weeks prior to commencement of construction activities and under direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) will be implemented to ensure that noise levels resulting from construction activities do not exceed 60 dB hourly average at the edge of habitat (within the MHPA) occupied by the CAGN. Concurrent with commencement of construction activities and construction of necessary noise attenuation facilities, noise

monitoring* will be conducted at the edge of occupied habitat area within the MHPA to ensure that noise levels do not exceed 60 dB hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities will cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

- B. If CAGNs are not detected within the MHPA during the protocol survey, the qualified biologist will submit substantial evidence to the City Manager and applicable wildlife agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:

  I. If evidence indicates high potential for CAGN presence based on historical records or site conditions, Condition A.III shall be adhered to as specified above.

  II. If evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM-18 Prior to issuance of building permits, the City of San Diego MMC Section shall ensure that the Project plans includes the installation fencing along the MHPA boundary to protect the MHPA.

MM-19 Prior to issuance of grading or building permit issuance, the City of San Diego Building Division and/or City Engineer shall ensure that the following notes are included on Project plans. The Project Construction Contractor shall be responsible for monitoring for compliance with this requirement, and shall permit periodic inspection by the City of San Diego at the City's discretion:

- *All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA.*

- *Vehicles and equipment brought to the site will be washed at an appropriate off-site location/facility prior to entering the site, and no construction activities will be located outside approved construction limits. Furthermore, all construction related debris will be removed off site to an approved disposal facility.*

HISTORICAL RESOURCES

MM-20 Prior to the issuance of a grading permit, the Project Applicant shall retain a qualified Project Archaeologist to implement a Cultural Resource Monitoring Program. The Project Applicant shall provide written verification in the form of a letter from the Project Archaeologist to the Lead Agency stating that a certified archaeologist has been retained to implement the monitoring program.

MM-21 Prior to the issuance of a grading permit, the Project Applicant shall enter into a monitoring agreement a Native American monitor during grading activities. The Native

American monitor shall work in concert with the archaeological monitor to observe ground disturbances and search for cultural materials.

MM-22 Prior to the issuance of a grading permit, the Project Applicant or construction contractor shall provide evidence that the certified Archaeologist attended the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

MM-23 During the original cutting of previously undisturbed deposits, the Archaeological Monitor(s) and Native American Monitor shall be on-site, as determined by the Project Archaeologist, to perform periodic inspections of the excavations. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The Project Archaeologist shall have the authority to modify the monitoring program if the potential for cultural resources appears to be less than anticipated.

MM-24 In the event that previously unidentified cultural resources are discovered, the Project Archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. The Archaeologist shall contact the Lead Agency at the time of discovery. The Archaeologist, in consultation with the Lead Agency, shall determine the significance of the discovered resources. The Lead Agency must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist and approved by the Lead Agency before being carried out using professional archaeological methods. If any human bones are discovered, the County Coroner and Lead Agency shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored grading can proceed. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to the City of San Diego upon the completion of a treatment plan and final report detailing the significance and treatment finding.

MM-25 If any cultural or historical material is discovered on the property, all cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

MM-26 Prior to grading permit final inspection, in the event any resources are found on-site during construction activities, a report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed

and submitted to the satisfaction of the Lead Agency. The report will include DPR Primary and Archaeological Site Forms.

GEOLOGY AND SOILS

MM-27 Prior to final grading permit inspection, City of San Diego staff shall verify that all of the recommendations given Section 4.0 of the Project's May 19, 2017 "Soil Management Plan" by C Young Associates, have been incorporated as part of Project grading activities.

MM-28 Prior to final grading permit inspection, City of San Diego staff shall verify that all of the recommendations given Section 6.0 of the Project's May 26, 2017 "Geotechnical Review of Tentative Map, Otay Canyon Ranch, Otay Mesa Area, City of San Diego, California" by Advanced Geotechnical Solutions, Inc., are incorporated into the grading plans.

MM-29 Prior to the issuance of grading permits, the Project Applicant shall provide a Paleontological Mitigation, Monitoring, and Reporting Program (MMRP) in areas of the Project site containing "high paleontological resource sensitivity". The City of San Diego Mitigation Monitoring Coordination (MMC) section of the Development Services Department shall oversee the implementation of the Paleontological MMRP and shall ensure that the requirements of the Paleontological MMRP are included on the Project's grading plans. In the even previously identified paleontological resources are discovered on-site, final signoff by the City of San Diego MMC shall not occur without final approval of the paleontological report and archival conservation of any recovered fossils into a museum or university paleontological collection.

TRANSPORTATION/CIRCULATION

Mitigation for Construction Related Traffic Impacts

MM-30 Prior to the issuance of the first grading permit or first public improvement affecting Airway Road or Cactus Road, the Owner/Permittee shall prepare and submit for approval for a temporary traffic control plan, satisfactory to the City Engineer. A requirement to comply with temporary traffic control plans approved by the City Engineer shall be noted on all grading plans and also shall be specified in bid documents issued to prospective construction contractors.

Mitigation for Phase 1 (2023) Direct Traffic Impacts

It should be noted that in order to aid the implementation of Project-specific Mitigation Measures MM-31 through MM-56, a condition of approval would be imposed upon future development permits (i.e., the future required NDPs) requiring the preparation of a tracking chart that identifies each development permit that has been approved within the CVSP and the associated ADT to ensure that the required mitigation is implemented before any projected LOS deficiencies.

MM-31 Prior to the Project's total trip generation of 4,912 ADT, the Owner/Permittee shall widen the eastbound approach (Airway Road) to accommodate dual left-turn lanes and a through lane with a shared right-turn lane, and add a right-turn overlap phase at the southbound

approach (Britannia Blvd) at the intersection of Britannia Boulevard at Airway Road, satisfactory to the City Engineer (Intersection #11).

MM-32 Prior to the Project's total trip generation of 1,493 ADT, the Owner/Permittee shall widen the roadway segment of Britannia Boulevard, between SR-905 EB Ramps and Airway Road from a 5-Lane Prime Arterial (2 NB & 3 SB) to a 6-Lane Prime Arterial roadway, satisfactory to the City Engineer.

MM-33 Prior to the Project's total trip generation of 4,310 ADT, the Owner/Permittee shall widen the roadway segment of Airway Road, between Cactus Road and Britannia Boulevard from a 2-Lane Collector to a 4-Lane Collector roadway, satisfactory to the City Engineer.

MM-34 Prior to the Project's total trip generation of 682 ADT, the Owner/Permittee shall widen the roadway segment of Airway Road, between Britannia Boulevard and 1,600 feet west of La Media Road from a 2-Lane Collector to a 2-Lane Collector with a continuous left-turn lane, satisfactory to the City Engineer.

Mitigation for Full Development (2027) Direct Traffic Impacts

MM-35 Prior to the Project's total trip generation of 9,026 ADT, the Owner/Permittee shall widen the eastbound approach (Airway Road) of this intersection to accommodate dual left-turn lanes and a through lane with a shared right-turn lane, widen the southbound approach (Britannia Boulevard) to accommodate an exclusive left-turn lane, two through lanes, two exclusive right-turn lanes with right-turn overlap phasing on the westbound approach, and stripe an exclusive left-turn lane at the westbound approach (Airway Road) and add right-turn overlap phasing at the intersection of Britannia Boulevard at Airway Road, satisfactory to the City Engineer (Intersection #11).

MM-36 Prior to the Project's total trip generation of 11,528 ADT, the Owner/Permittee shall widen the roadway segment of Airway Road, between Cactus Road and Britannia Boulevard from a 4-Lane Collector to a 4-Lane Collector with a continuous left-turn lane, satisfactory to the City Engineer.

Mitigation for Full Development (2027) Cumulative Traffic Impacts

MM-37 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 2.23% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Caliente Avenue at SR-905 EB Ramps (Intersection #2), satisfactory to the City Engineer:

- Widen of the eastbound approach (SR-905 EB Ramps) to accommodate an exclusive left-turn lane, a through lane with a shared right-turn lane, and an exclusive right-turn lane;
- Restripe the southbound approach (Caliente Avenue) to accommodate dual left-turn lanes and three through lanes; and

- Widen the northbound approach to accommodate three through lanes and an exclusive right-turn lane.

MM-38 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 1.40% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Caliente Avenue at Airway Road (Intersection #3), satisfactory to the City Engineer:

- Widen the eastbound approach (Airway Road) to accommodate dual left-turn lanes, two through lanes, and an exclusive right-turn lane; and
- Widen the northbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

MM-39 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 2.67% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Innovative Drive at Otay Mesa Road (Intersection #4), satisfactory to the City Engineer:

- Widen the southbound approach to accommodate dual left-turn lanes, a through lane with a shared right-turn lane, and an exclusive right-turn lane.

MM-40 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 3.27% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Heritage Road at Otay Mesa Road (Intersection #5), satisfactory to the City Engineer:

- Widen of the southbound approach (Heritage Road) to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane;
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

MM-41 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 5.62% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Cactus Road at Otay Mesa Road (Intersection #6), satisfactory to the City Engineer:

- Widen the eastbound approach (Otay Mesa Road) to accommodate an exclusive left-turn lane, three through lanes and dual right-turn lanes; and
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

MM-42 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 15.61% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Cactus Road at Airway Road (Intersection #7), satisfactory to the City Engineer:

- Widen the eastbound approach (Airway Road) to accommodate dual left-turn lanes, three through lanes with a shared right-turn lane, and an exclusive right-turn lane;
- Widen the southbound approach (Cactus Road) to accommodate dual left-turn lanes, two through lanes with a shared right-turn lane and an exclusive right-turn lane;
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane.

MM-43 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 14.21% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Britannia Boulevard at Otay Mesa Road (Intersection #8), satisfactory to the City Engineer:

- Widen the eastbound approach (Otay Mesa Road) to accommodate an exclusive left-turn lane, three through lanes and an exclusive right-turn lane; and
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

MM-44 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 18.61% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Britannia Boulevard at SR-905 WB Ramps (Intersection #9), satisfactory to the City Engineer:

- Restripe the westbound approach to accommodate an exclusive left-turn lane, a shared left-through-right lane, and an exclusive right-turn lane; and
- Widen the southbound approach to accommodate three through lanes with a shared right-turn lane and an exclusive right-turn lane.

MM-45 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 13.45% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Britannia at SR-905 EB Ramps (Intersection #10), satisfactory to the City Engineer:

- Widen the northbound approach to accommodate three through lanes and dual right-turn lanes.

MM-46 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 9.43% fair-share monetary

contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Britannia Boulevard at Airway Road (Intersection #11), satisfactory to the City Engineer:

- Widen the eastbound approach (Airway Road) to accommodate dual left-turn lanes, three through lanes, and an exclusive right-turn lane;
- Widen the southbound approach (Britannia Blvd) to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes;
- Widen the westbound approach to accommodate dual left-turn lanes, two through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

MM-47 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 0.87% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of La Media Road at Otay Mesa Road (Intersection #13), satisfactory to the City Engineer:

- Widen the eastbound approach (Otay Mesa Road) to accommodate dual left-turn lanes, three through lanes, and dual right-turn lanes;
- Widen the southbound approach (La Media Road) to accommodate dual left-turn lanes, two through lanes and dual right-turn lanes;
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes.

MM-48 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 0.42% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of La Media Road at Airway Road (Intersection #14), satisfactory to the City Engineer:

- Widen the eastbound approach (Airway Road) to accommodate dual left-turn lanes, two through lanes, and an exclusive right-turn lane;
- Widen the southbound approach (La Media Road) to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes;
- Widen the westbound approach to accommodate dual left-turn lanes, two through lanes and dual right-turn lanes; and
- Widen the northbound approach to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane.

MM-49 The Project's fair share of Horizon Year (Buildout of Community Plan) Plus Project impacts to the intersection of Village Way at Airway Road (Intersection #16) is calculated as 9.05%. However, because the intersection is fully within Tentative Map No. 197222, the

Owner/Permittee shall signalize the intersection of Village Way at Airway Road (Intersection #16) when warranted, satisfactory to the City Engineer.

MM-50 The Project's fair share of Horizon Year (Buildout of Community Plan) Plus Project impacts to the intersection of Cactus Road at Street "D" (Intersection #17) is calculated as 5.03%. However, because the Project fronts one of the four corners of the intersection, the Owner/Permittee shall contribute 25% toward future signalization of this intersection, with appropriate credits for traffic signal infrastructure installed by the Owner/Permittee, satisfactory to the City Engineer. Payment shall be made to a Developer Contribution Fund and shall occur prior to issuance of the Project's 1,600th building permit.

MM-51 The Project's fair share of Horizon Year (Buildout of Community Plan) Plus Project impacts to the intersection of Cactus Road at Central Main Street (Intersection #18) is calculated as 13.72%. However, because the Project fronts one of the four corners of the intersection, the Owner/Permittee shall contribute 25% toward future signalization of this intersection, with appropriate credits for traffic signal infrastructure installed by the Owner/Permittee, satisfactory to the City Engineer. Payment shall be made to a Developer Contribution Fund and shall occur prior to issuance of the Project's 1,600th building permit.

MM-52 The Project's fair share of Horizon Year (Buildout of Community Plan) Plus Project impacts to the intersection of Cactus Road at Street "C" (Intersection #18) is calculated as 7.62%. However, because the Project fronts one of the four corners of the intersection, the Owner/Permittee shall contribute 25% toward future signalization of this intersection, with appropriate credits for traffic signal infrastructure installed by the Owner/Permittee, satisfactory to the City Engineer. Payment shall be made to a Developer Contribution Fund and shall occur prior to issuance of the Project's 1,600th building permit.

MM-53 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 4.68% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Cactus Road at Siempre Viva Road (Intersection #20), satisfactory to the City Engineer:

- Widen the northbound approach to accommodate an exclusive right-turn lane.

MM-54 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 2.50% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Britannia Boulevard at Siempre Viva Road (Intersection #21), satisfactory to the City Engineer:

- Widen the eastbound approach (Siempre Viva Road) to accommodate dual left-turn lanes, three through lanes, and an exclusive right-turn lane;
- Widen the southbound approach (Britannia Boulevard) to accommodate dual left-turn lanes, two through lanes and dual right-turn lanes;
- Widen the westbound approach to accommodate dual left-turn lanes, three through lanes and dual right-turn lanes; and

- Widen the northbound approach to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane.

MM-55 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 2.36% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of La Media Road at Siempre Viva Road (Intersection #22), satisfactory to the City Engineer:

- Widen the southbound approach (La Media Road) to accommodate dual left-turn lanes, one through lane and dual right-turn lanes; and
- Widen the westbound approach to accommodate three through lanes and dual right-turn lanes.

MM-56 Prior to issuance of the first building permit for the second phase (Full Development) of the proposed development, the Owner/Permittee shall make a 2.07% fair-share monetary contribution to the City of San Diego, with appropriate fee credits, for the following improvements to the intersection of Heritage Road at Datsun Street (Intersection #24), satisfactory to the City Engineer:

- Widen the eastbound approach (Datsun Street) to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane;
- Widen the southbound approach (Heritage Road) to accommodate dual left-turn lanes, three through lanes dual right-turn lanes;
- Widen the westbound approach to accommodate dual left-turn lanes, two through lanes and an exclusive right-turn lane; and
- Widen the northbound approach to accommodate dual left-turn lanes, three through lanes and an exclusive right-turn lane.

UTILITIES AND SERVICE SYSTEMS

MM-57 Prior to the issuance of any construction permits, the Solid Waste Coordinator shall ensure ESD's attendance at a pre-construction meeting. The Solid Waste Coordinator shall ensure that (1) the proposed approach to contractor education is approved, (2) the written specifications for base materials, concrete pavers, decomposed granite, and mulch are approved, (3) the C&D Ordinance deposit has been paid, (4) an appropriate diversion rate (from the Waste Management Plan) has been included on all construction permits and documents, including the C&D deposit form, and (5) that the ESD inspector approves the separate waste containers, signage, and hauling contract(s) for the following materials:

- Drywall
- Concrete
- Clean Wood
- Scrap Metal
- Polystyrene
- Roofing
- Cardboard

- Trash

MM-58 The Project shall be designed to achieve 75 percent of construction waste to be diverted and/or recycled. The Project shall implement environmentally sound waste management by salvaging material such as steep, copper, other metals, and equipment; and reusing material such as concrete, steel, and asphalt. To the extent feasible, the Project shall recycle, salvage, and reuse materials and then divert materials to a landfill

MM-59 Prior to the issuance of any building permit, the Assistant Deputy Director Environmental Designee shall verify that all of the requirements of the Refuse and Recyclable Materials Storage Regulations and all of the requirements of the Waste Management Plan are shown and noted on the appropriate construction documents. All requirements, notes, and graphics shall be in substantial conformance with the conditions and exhibits of the associated discretionary approval.

- The construction documents shall include a waste management plan. Notification shall be sent to the following:
  MMC Environmental Review Specialist Development Services Department
  9601 Ridgehaven Court
  Suite 220, MS 1102 B
  San Diego, CA 92123
  (619) 980-1236

  Environmental Services Department (ESD)
  9601 Ridgehaven Court
  Suite 210, MS 1102 A
  San Diego, CA 92123
  (858) 573-1236

MM-60 Prior to the issuance of any certificate of occupancy/tentative certificate of occupancy, the Owner/Permittee shall be required to submit written evidence to the Assistant Deputy Director (ADD) of the Entitlements Division that the final Construction Report has been approved by Mitigation Monitoring Coordinator (MMC) and the Environmental Services Department (ESD). The Construction Report will be required to include the following information:

- The actual waste generated and diverted from the Project;
- The waste reduction percentage achieved; and
- How the waste reduction percentage goal was achieved.

MM-61 Prior to the issuance of any certificate of occupancy/tentative certificate of occupancy the Owner/Permittee shall invite a representative of the City's ESD to inspect the following measures as described in this report have been successfully implemented:

- Adequate storage area has been provided as consistent with the City's Storage Ordinance,
- Hauler(s) has been retained to provide recyclable materials collection, and

- Education materials for building tenants/owners have been prepared as required per the City's Recycling Ordinance.

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AB	Assembly Bill
AC	Asphalt Concrete
ADD	Assistant Deputy Director
ADT	Average Daily Trips
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AQIA	Air Quality Impact Assessment
AQMP	Air Quality Management Plan
AR-1-1	Agricultural – Residential (Zoning Designation)
AST	Above-Ground Storage Tanks
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAU	Business as Usual
BI	Building Inspector
BLA	Boundary Line Adjustment
BMP	Best Management Practice
BTR	Biological Technical Report
BUOW	Burrowing Owl
CAP	Climate Action Plan
CAGN	Coastal California Gnatcatcher
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
CIP	Capital Improvements Projects
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
Cont'd	Continued
CPIOZ	Community Plan Implementation Overlay Zone
CPU	Community Plan Update
CRHR	California Register of Historical Resources
CVSP	Central Village Specific Plan
CVSR	Consultant Site Visit Record Forms
DEH	County of San Diego Department of Environmental Health
DHS	California Department of Health Services
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
E+P	Existing plus Project
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FMMP	Farmland Mapping and Monitoring Program
GC	Grading Contractor
GHG	Greenhouse Gas
HHI	Health Hazard Index
HOA	Homeowners' Association
HRA	Health Risk Assessment
HRB	Historical Resources Board
I-805	Interstate 805
LAS	Landscape Architecture Section
LCD	Landscape Construction Documents
LDC	Land Development Code
LDR	Land Development Review Division
LID	Low Impact Design
LOMR-F	Letter of Map Revision based on Fill
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MEIR	Maximally Exposed Individual Resident
MEIW	Maximally Exposed Individual Worker
MERV	Maximum Efficiency Reporting Value
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MMC	Mitigation Monitoring Coordinator
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
NAHC	Native American Heritage Commission
NDP	Neighborhood Development Permit
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places

Acronym	Definition
NTP	Notice to Proceed
O_3	Ozone
OCP	Organochlorine Pesticide
OEHHA	Office of Environmental Health Hazard Assessment
OMCP	Otay Mesa Community Plan
OMCPU	Otay Mesa Community Plan Update
OWD	Otay Water District
PCB	Polychlorinated Biphenyl
PFFP	Public Facilities Financing Plan
PMI	Point of Maximum Impact
PQB	Principal Qualified Biologist
PRB	Principal Restoration Biologist
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RE	Resident Engineer
REC	Recognized Environmental Condition
RIC	Revegetation Installation Contractor
ROW	Right-of-Way
RRME	Revegetation/Restoration Monitoring Exhibit
RWQCB	Regional Water Quality Control Board
SAMP	Sub Area Water Master Plan
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDP	Site Development Permit
SDRQCB	San Diego Regional Quality Control Board
SIP	State Implementation Plan
SMP	Soils Management Plan
SR-905	State Route 905
STC	Sound Transition Class
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminant

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
TIS	Transportation Impact Study
TM	Tentative Map
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
WA	Wildlife Agencies
WMP	Waste Management Plan
WRMP	Water Resources Master Plan
WSA	Water Supply Assessment

VII. REFERENCES

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VIII. SIGNIFICANT UNMITIGATED IMPACTS

There are no new significant impacts identified for the current project. The proposed Lumina project does not change the original determination associated with the Final EIR for the OMCPU.

A majority of the significant impacts identified in the OMCPU Final EIR would be mitigated to below a level of significance through mitigation measures outlined in Table S-1 of the OMCPU EIR (and/or as modified herein). Consistent with the findings of the OMCPU EIR, impacts associated with air quality, noise, and transportation/circulation would remain significant and unmitigated.

Because there were significant unmitigated impacts associated with the original OMCPU project approval, the decision-makers were required to make specific and substantiated CEQA Findings which stated that: a) specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR, and b) these impacts have been found acceptable because of specific overriding considerations. No new CEQA Findings are required with this project.

Anna L. McPherson

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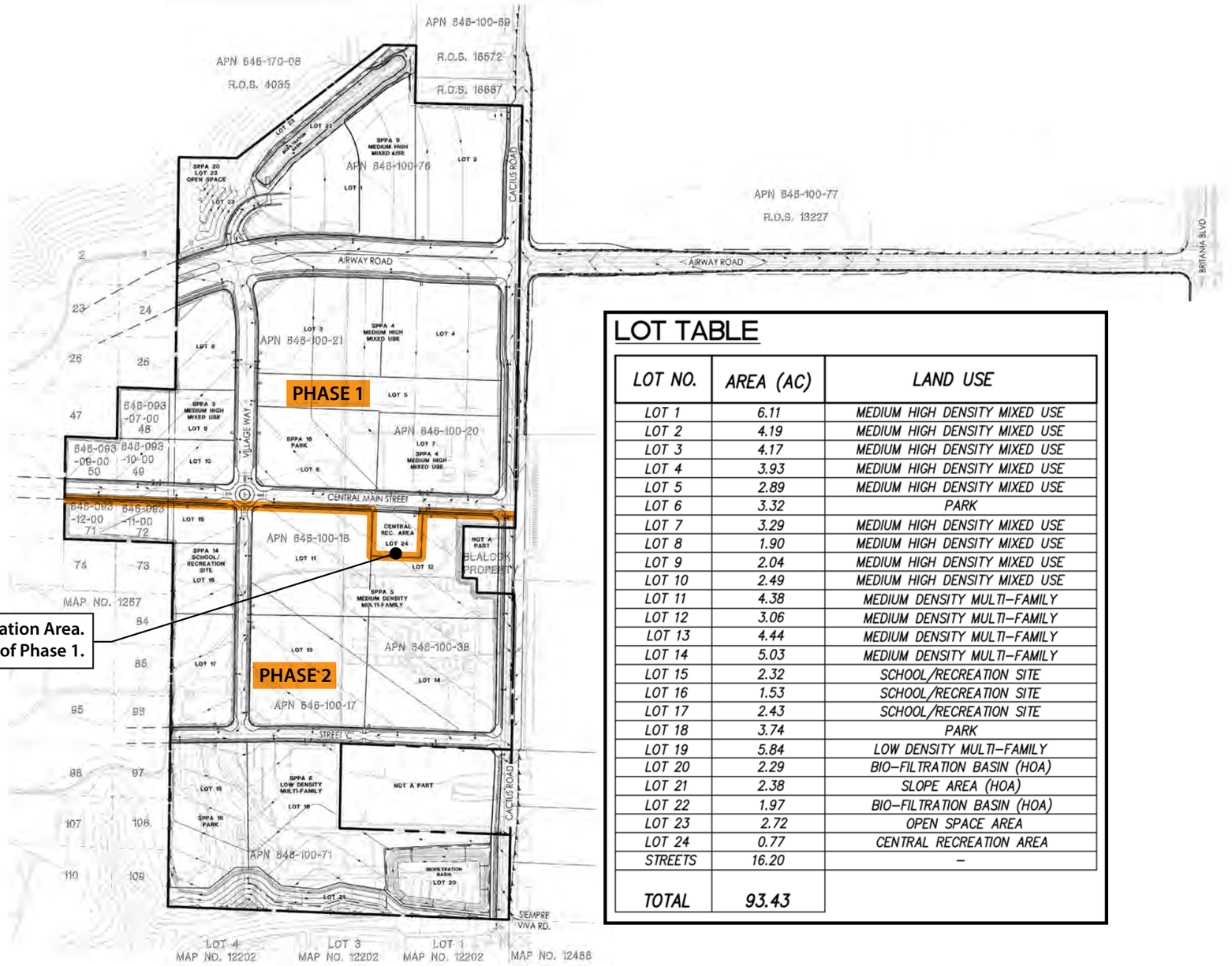
Program Manager
Development Services Department

May 7, 2019
Date of Final Report

Analyst: **Brunette**

Copies of the Addendum, the Final OMCPU EIR, the Mitigation Monitoring and Reporting Program, and supporting technical appendices may be reviewed in the office of the Development Services Department, located at 1222 First Avenue., San Diego, CA 92101-4101, or purchased from the Development Services Department for the cost of reproduction.



Location of the Central Recreation Area. This amenity opens as a part of Phase 1.

LOT TABLE

LOT NO.	AREA (AC)	LAND USE
LOT 1	6.11	MEDIUM HIGH DENSITY MIXED USE
LOT 2	4.19	MEDIUM HIGH DENSITY MIXED USE
LOT 3	4.17	MEDIUM HIGH DENSITY MIXED USE
LOT 4	3.93	MEDIUM HIGH DENSITY MIXED USE
LOT 5	2.89	MEDIUM HIGH DENSITY MIXED USE
LOT 6	3.32	PARK
LOT 7	3.29	MEDIUM HIGH DENSITY MIXED USE
LOT 8	1.90	MEDIUM HIGH DENSITY MIXED USE
LOT 9	2.04	MEDIUM HIGH DENSITY MIXED USE
LOT 10	2.49	MEDIUM HIGH DENSITY MIXED USE
LOT 11	4.38	MEDIUM DENSITY MULTI-FAMILY
LOT 12	3.06	MEDIUM DENSITY MULTI-FAMILY
LOT 13	4.44	MEDIUM DENSITY MULTI-FAMILY
LOT 14	5.03	MEDIUM DENSITY MULTI-FAMILY
LOT 15	2.32	SCHOOL/RECREATION SITE
LOT 16	1.53	SCHOOL/RECREATION SITE
LOT 17	2.43	SCHOOL/RECREATION SITE
LOT 18	3.74	PARK
LOT 19	5.84	LOW DENSITY MULTI-FAMILY
LOT 20	2.29	BIO-FILTRATION BASIN (HOA)
LOT 21	2.38	SLOPE AREA (HOA)
LOT 22	1.97	BIO-FILTRATION BASIN (HOA)
LOT 23	2.72	OPEN SPACE AREA
LOT 24	0.77	CENTRAL RECREATION AREA
STREETS	16.20	–
TOTAL	93.43	

Source(s): Project Design Consultants (04-18-2019)

Not to Scale

Figure 1

TENTATIVE MAP NO. 1972222

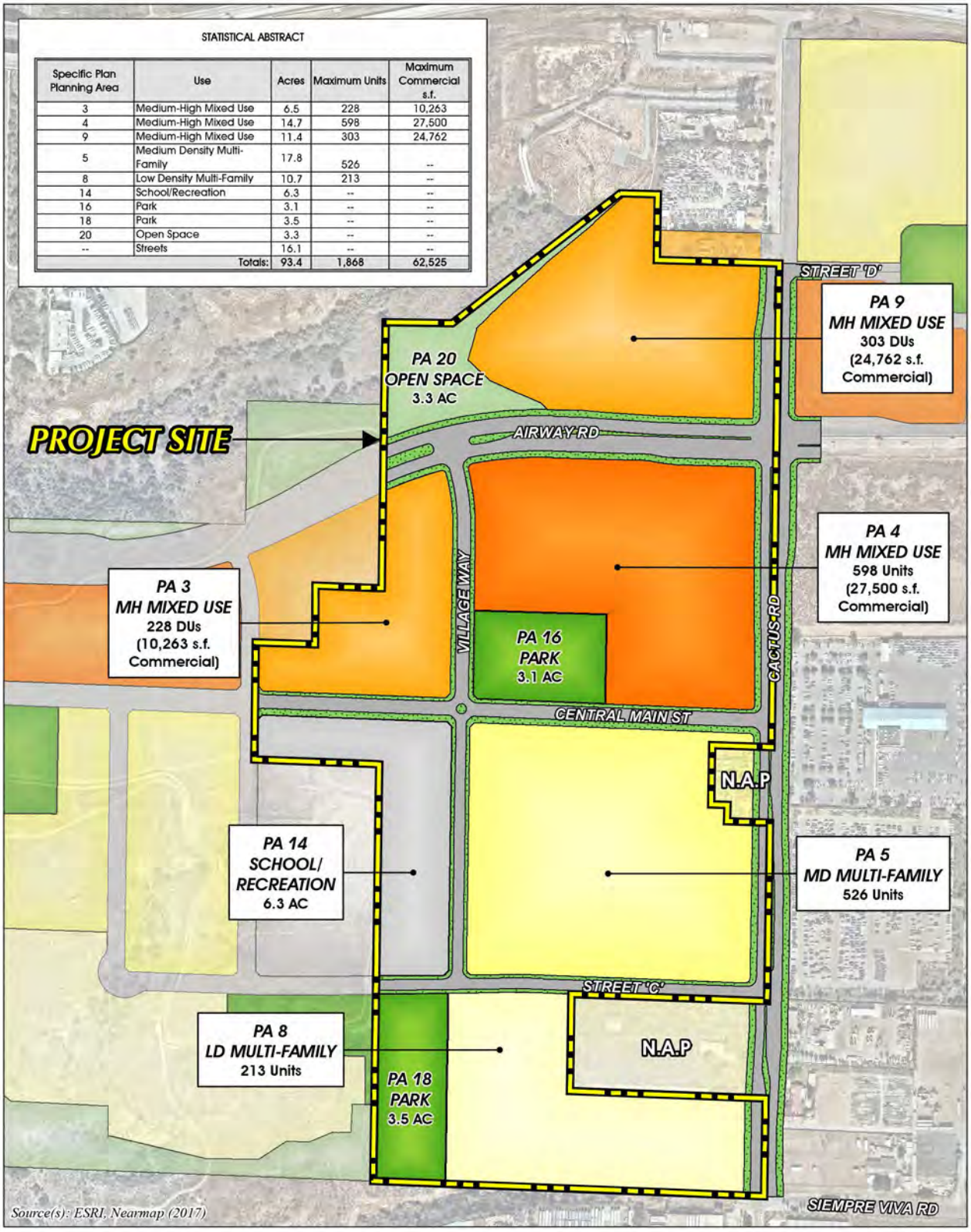


Figure 2

0 125 250 500 Feet

PLANNING

LAND USE PLAN

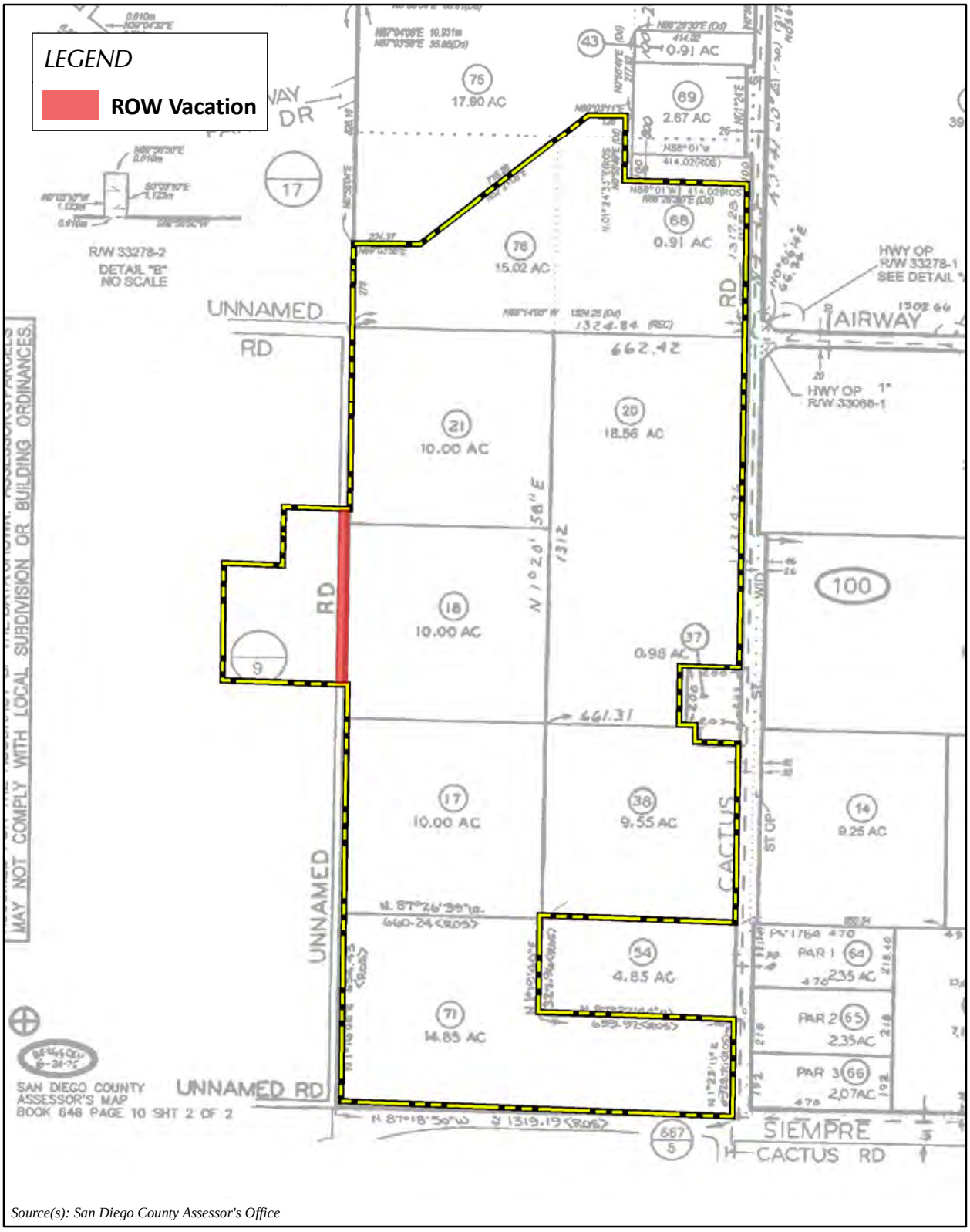


Figure 3

0 125 250 500 Feet

PROPOSED RIGHT-OF-WAY VACATION

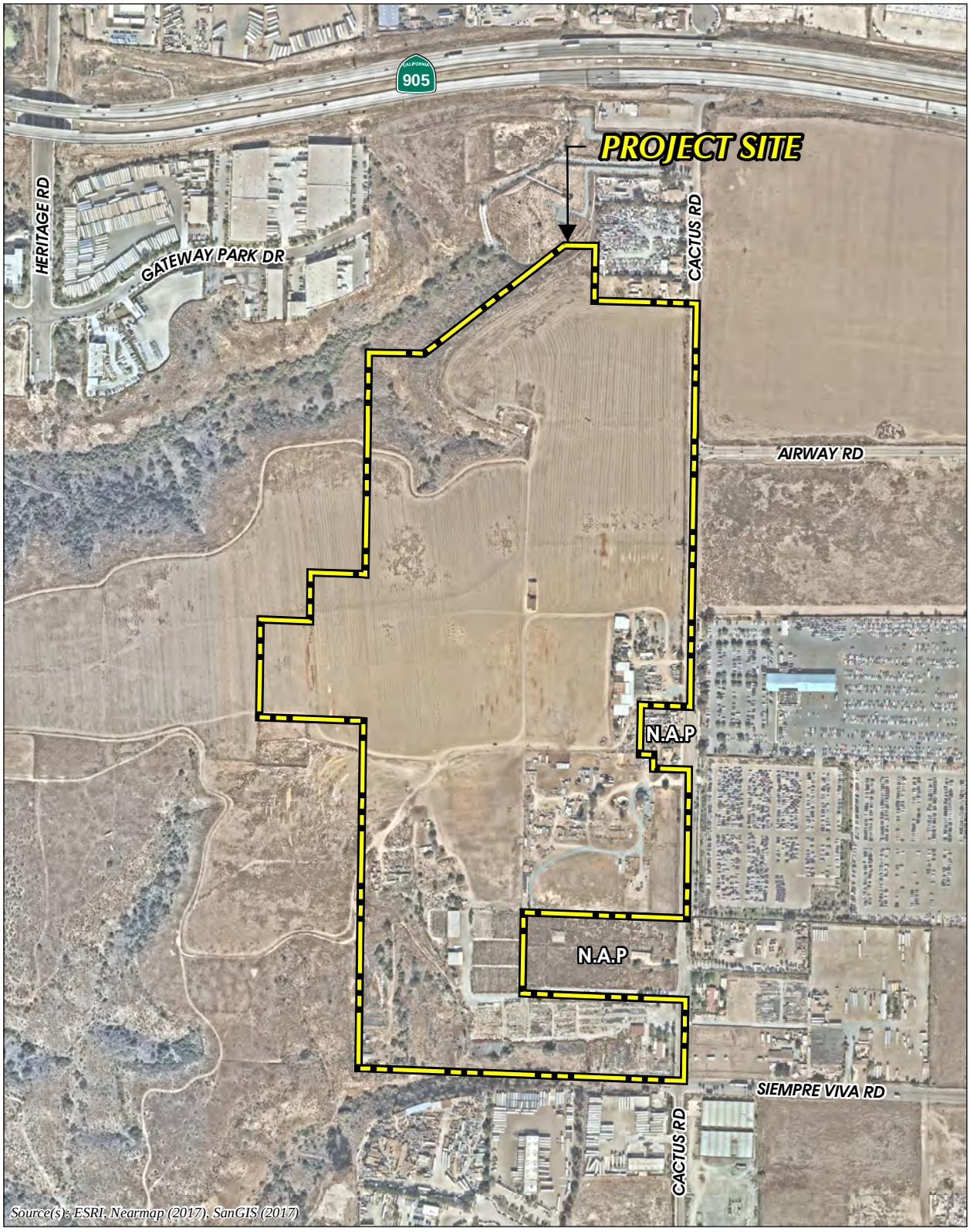


Figure 4

0 150 300 600 Feet

AERIAL PHOTOGRAPH

Figure 5

0 0.75 1.5 3 Miles

REGIONAL MAP

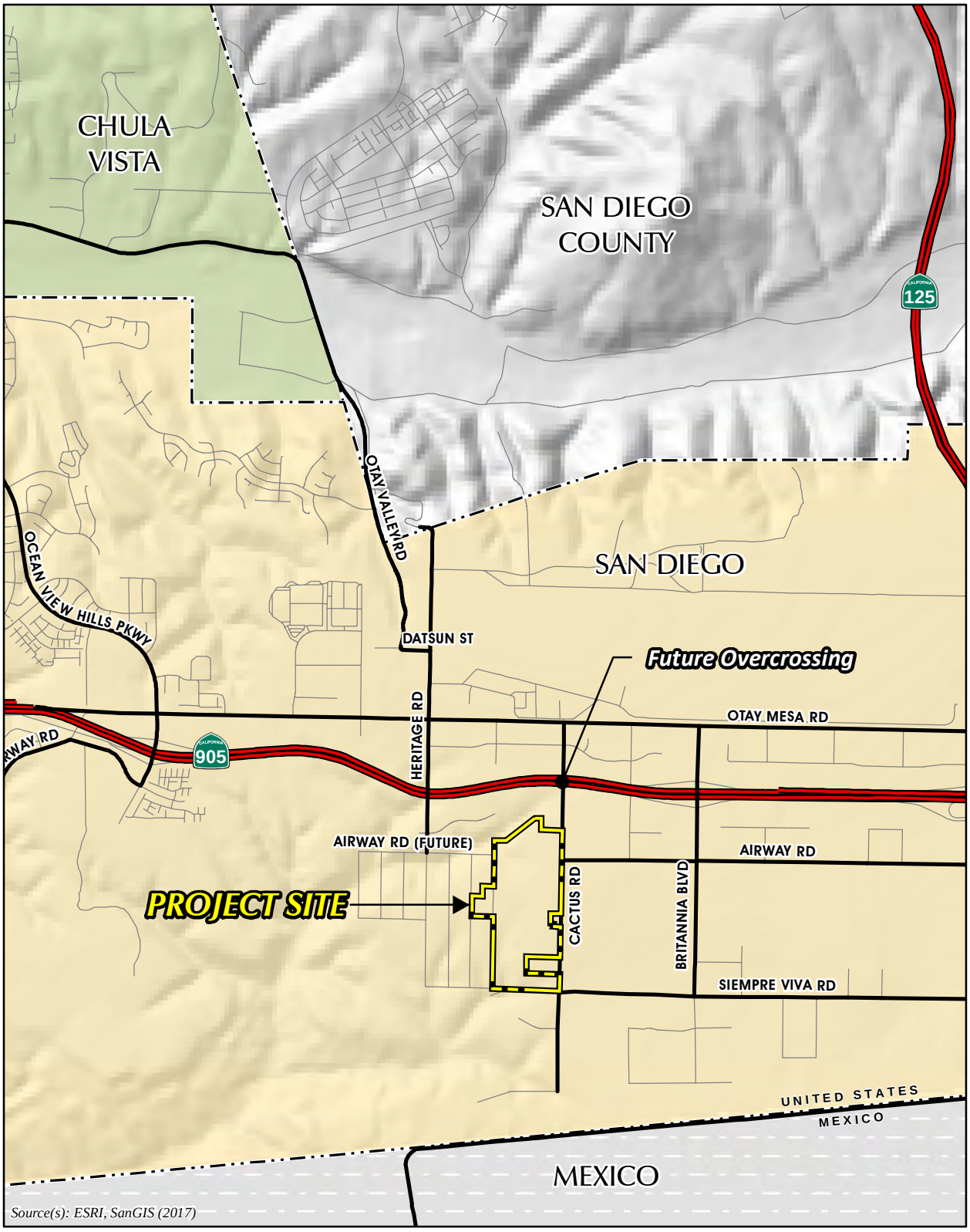
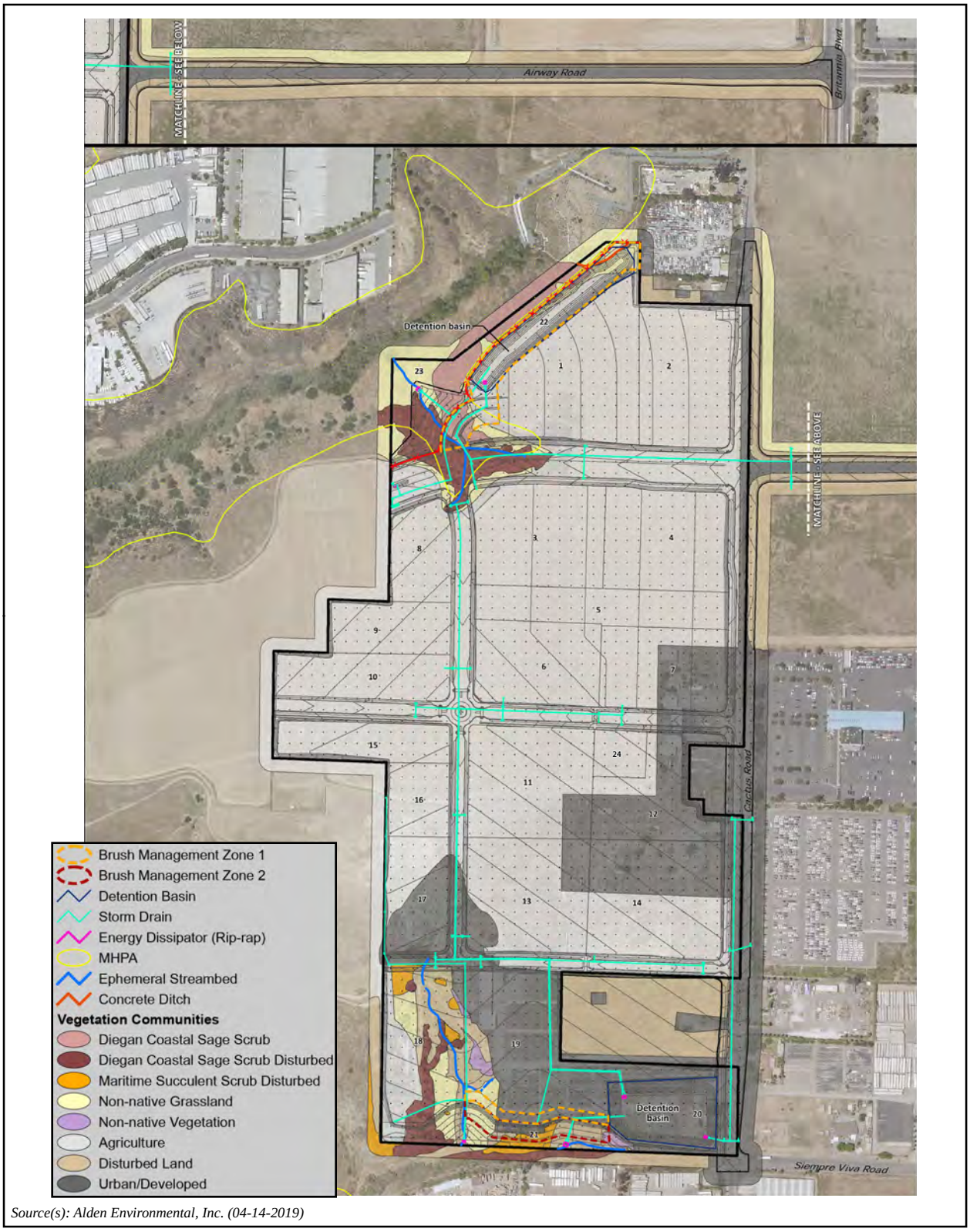


Figure 6

0 0.1250.25 0.5 Miles

VICINITY MAP

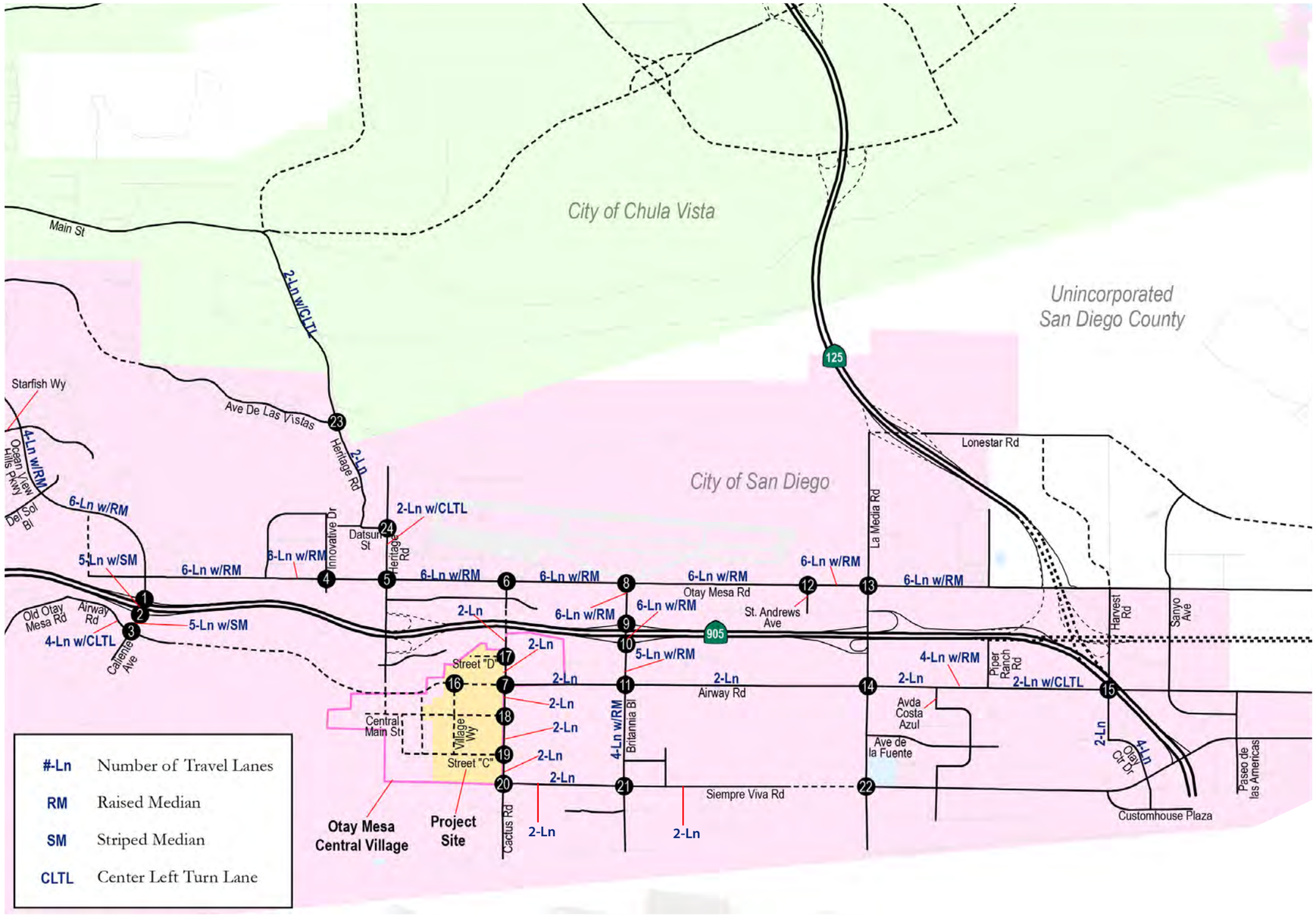


Source(s): Alden Environmental, Inc. (04-14-2019)

Figure 7

Not to Scale

VEGETATION COMMUNITIES IMPACTS

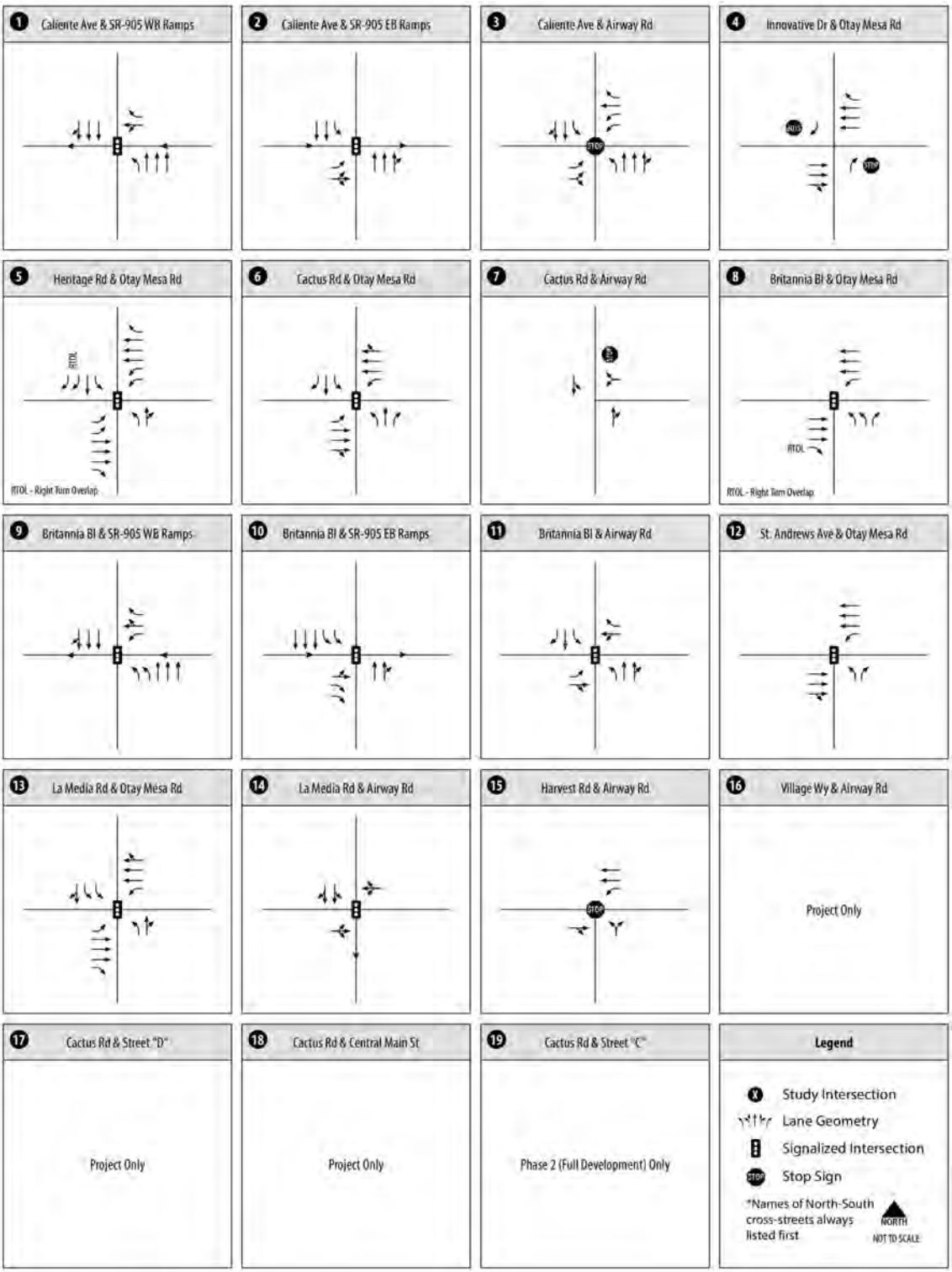


Source(s): Chen Ryan (02-20-2019, TIS Figure 4-1)

Figure 8

Not to Scale

EXISTING ROADWAY NETWORK

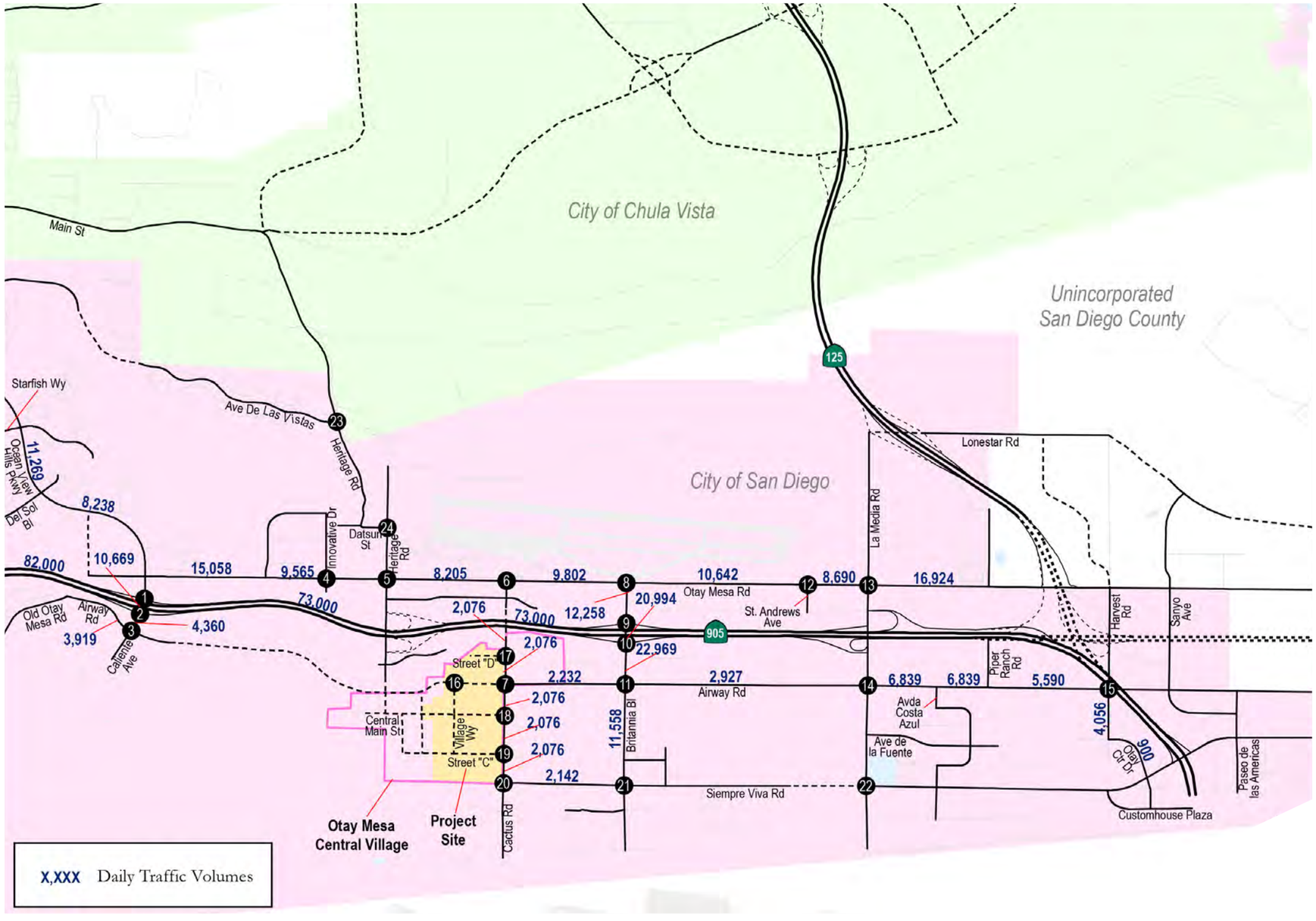


Source(s): Chen Ryan (02-20-2019, TIS Figure 4-2)

Figure 9

Not to Scale

EXISTING INTERSECTION GEOMETRICS AND INTERSECTION CONTROLS

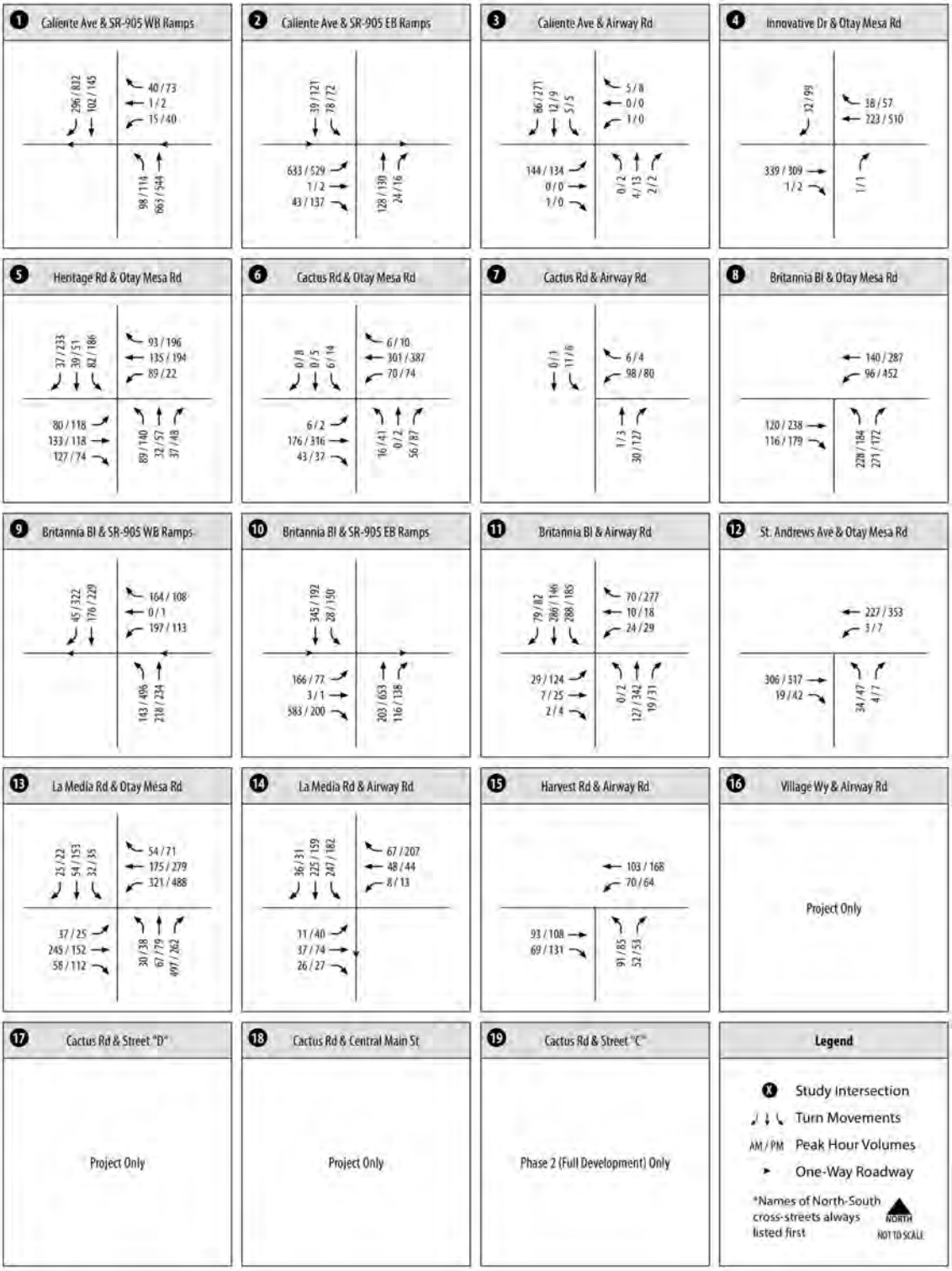


Source(s): Chen Ryan (02-20-2019, TIS Figure 4-3)

Figure 10

Not to Scale

EXISTING ROADWAY SEGMENT VOLUMES

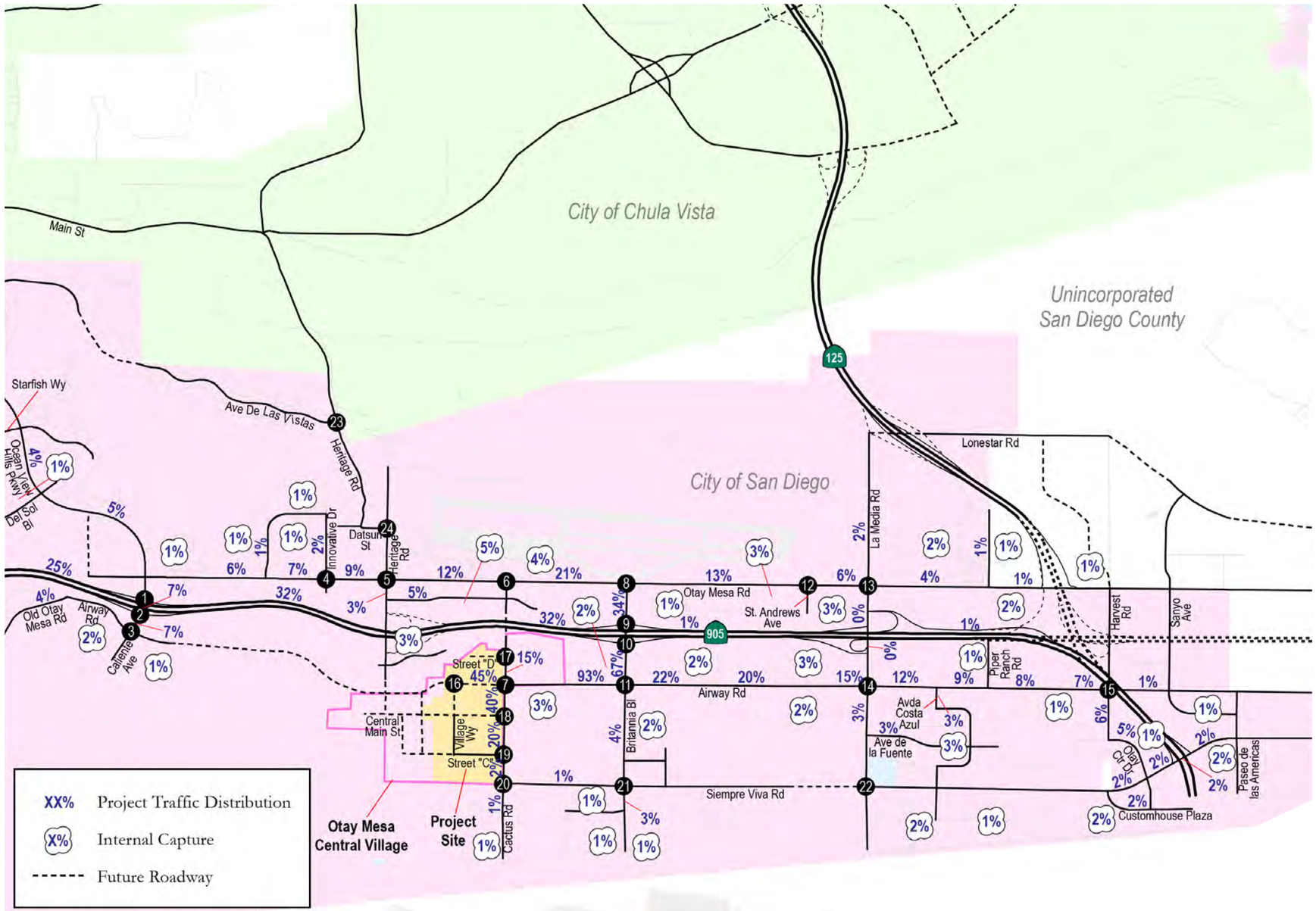


Source(s): Chen Ryan (02-20-2019, TIS Figure 4-4)

Figure 11

Not to Scale

EXISTING AM/PM PEAK HOUR INTERSECTION VOLUMES

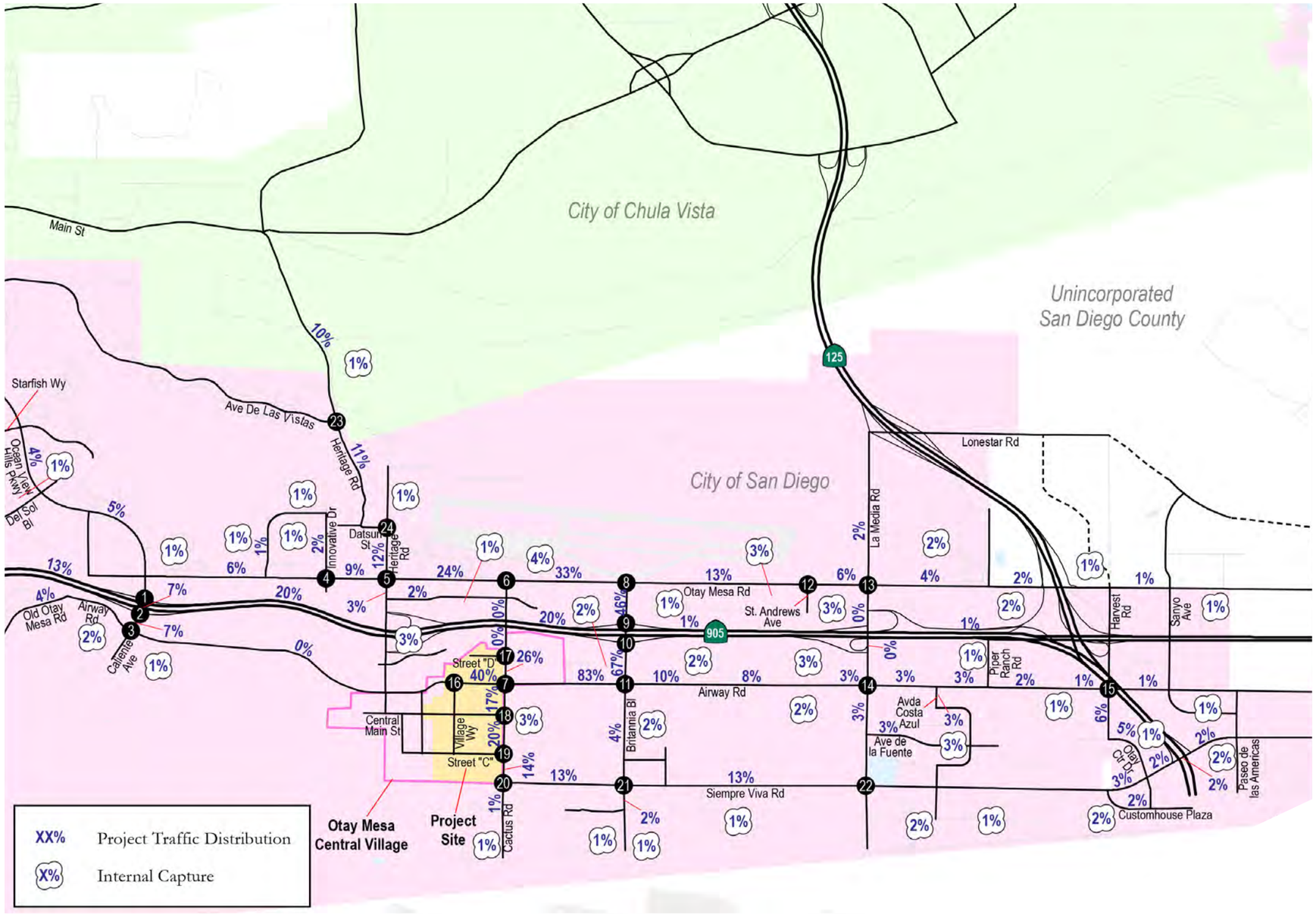


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-4)

Figure 12

Not to Scale

EXISTING AND NEAR-TERM (2023 AND 2027) TRIP DISTRIBUTION

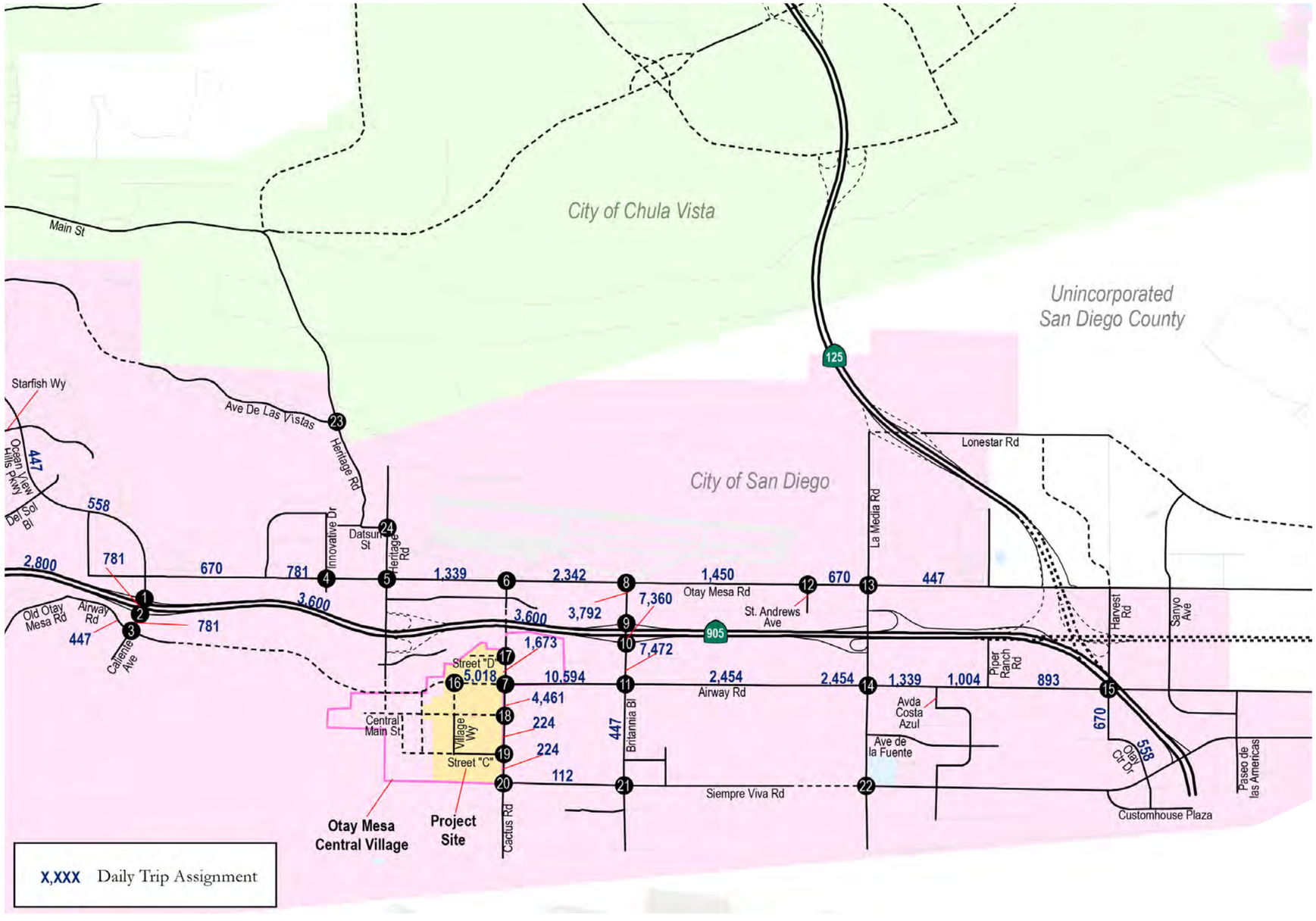


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-5)

Figure 13

Not to Scale

BUILDOUT OF COMMUNITY PLAN CONDITIONS
PROJECT TRIP DISTRIBUTION

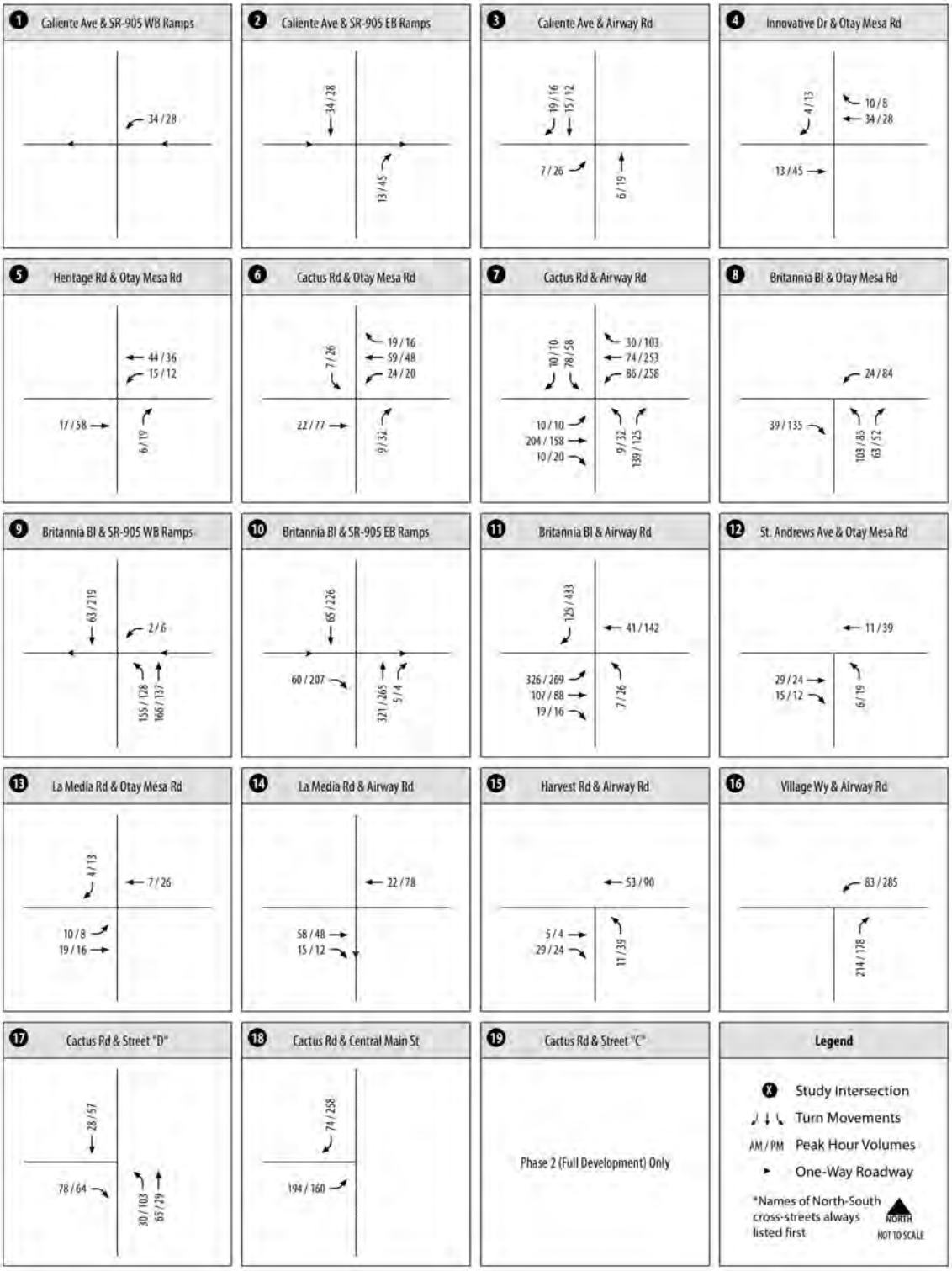


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-6)

Figure 14

Not to Scale

PROJECT ONLY TRAFFIC (PHASE 1) – NEAR-TERM 2023 ROADWAY NETWORK

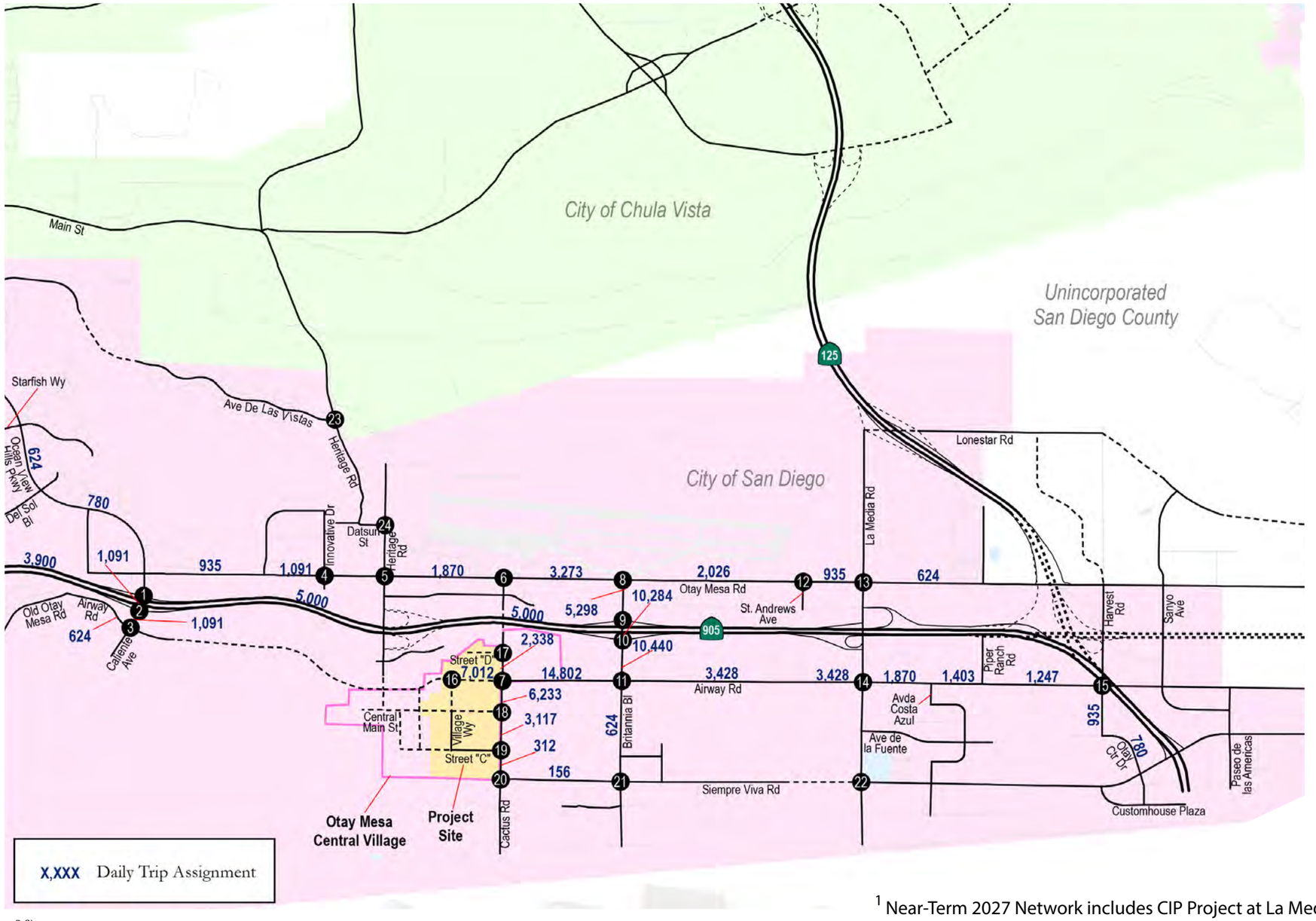


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-7)

Figure 15

Not to Scale

PROJECT ONLY TRAFFIC (PHASE 1) – NEAR-TERM 2023 TRIP ASSIGNMENT



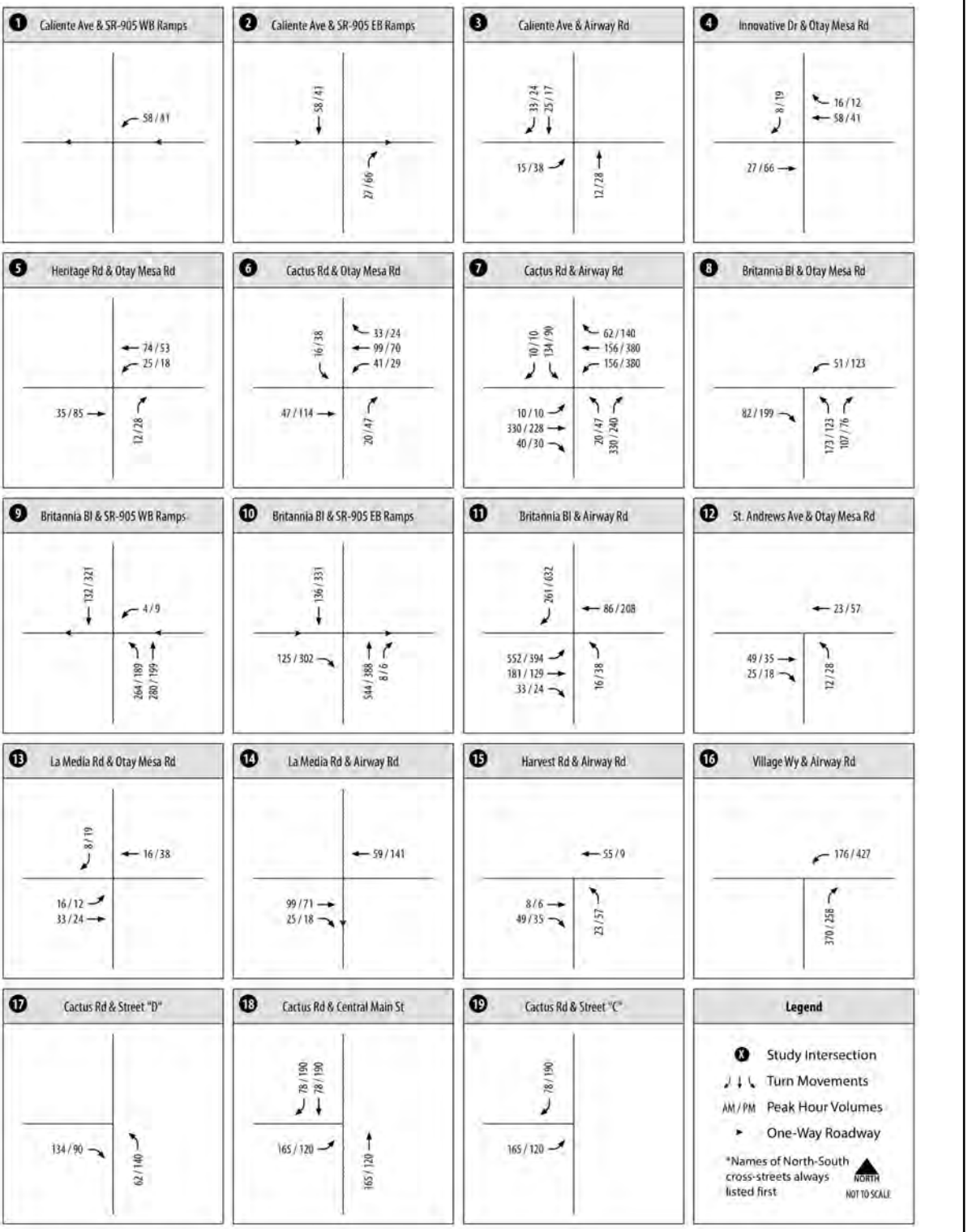
[1] Near-Term 2027 Network includes CIP Project at La Media Road / Airway Road

Source(s): Chen Ryan (02-20-2019, TIS Figure 3-8)

Figure 16

PROJECT ONLY TRAFFIC (FULL DEVELOPMENT) – EXISTING AND NEAR-TERM 2027[1] ROADWAY NETWORK

Not to Scale

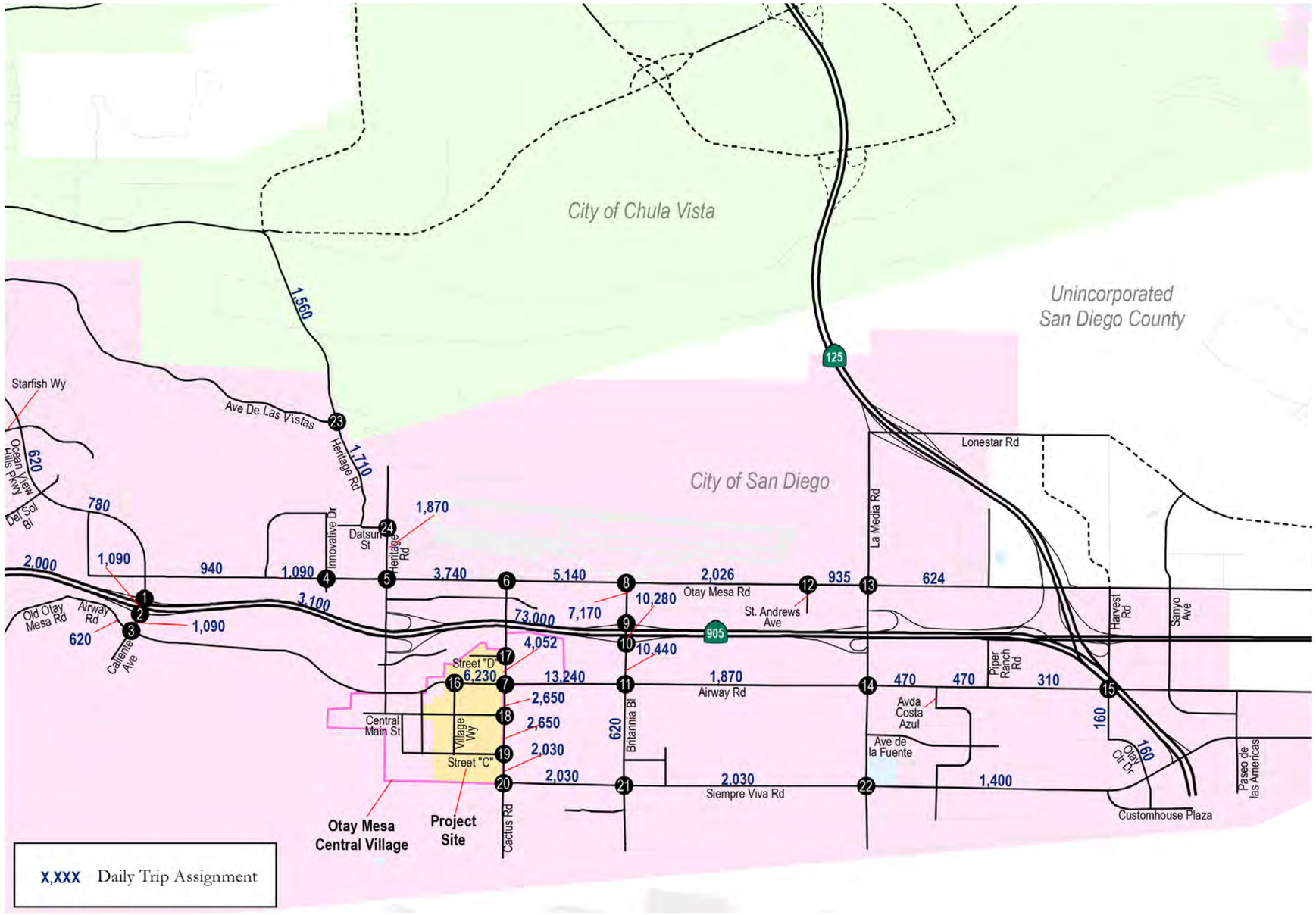


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-9)

Figure 17

Not to Scale

PROJECT ONLY TRAFFIC (FULL DEVELOPMENT) – EXISTING AND NEAR-TERM 2027 TRIP ASSIGNMENT

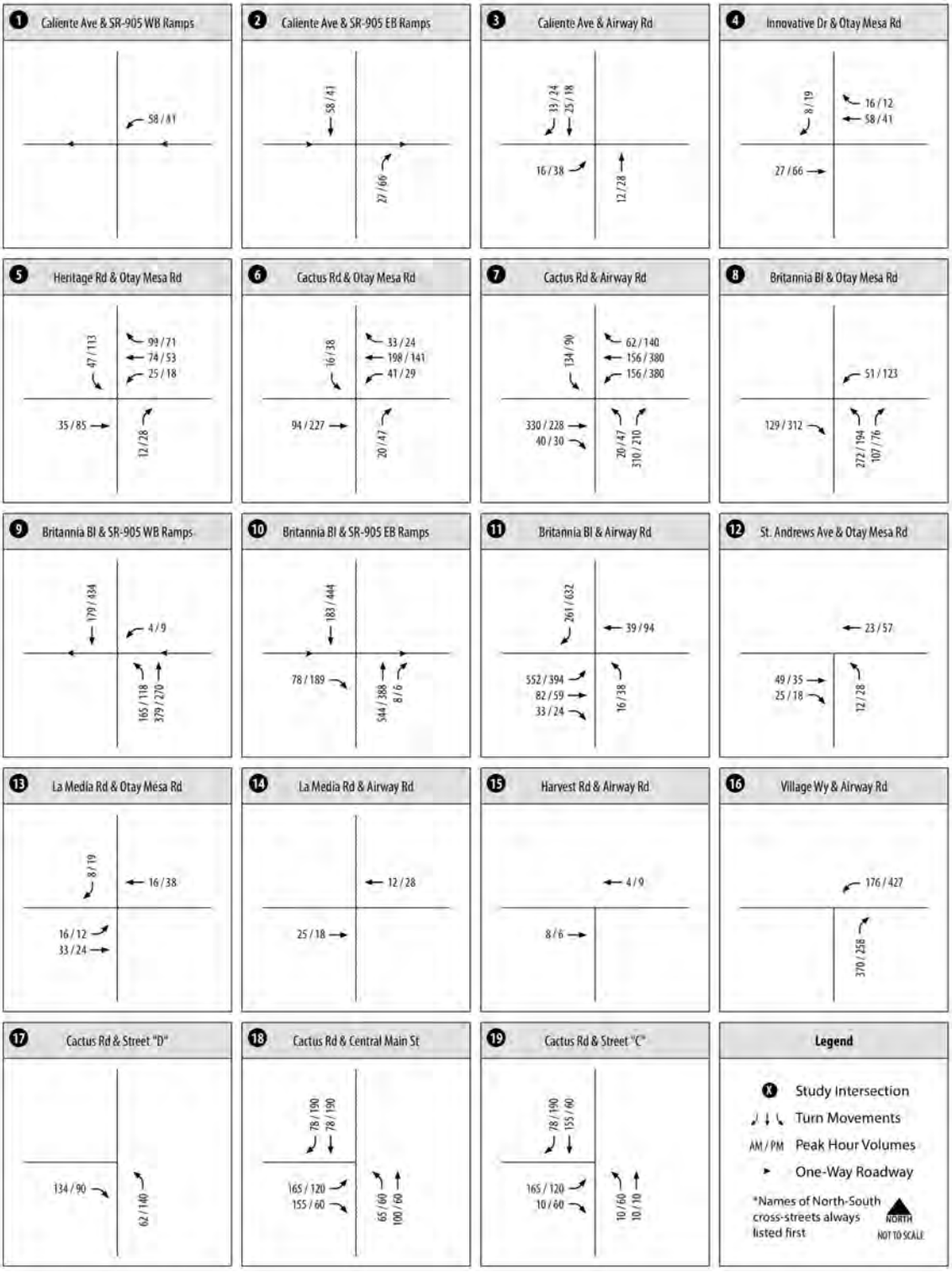


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-10)

Figure 18

Not to Scale

PROJECT ONLY TRAFFIC (FULL DEVELOPMENT) – BUILDOUT OF COMMUNITY PLAN ROADWAY NETWORK

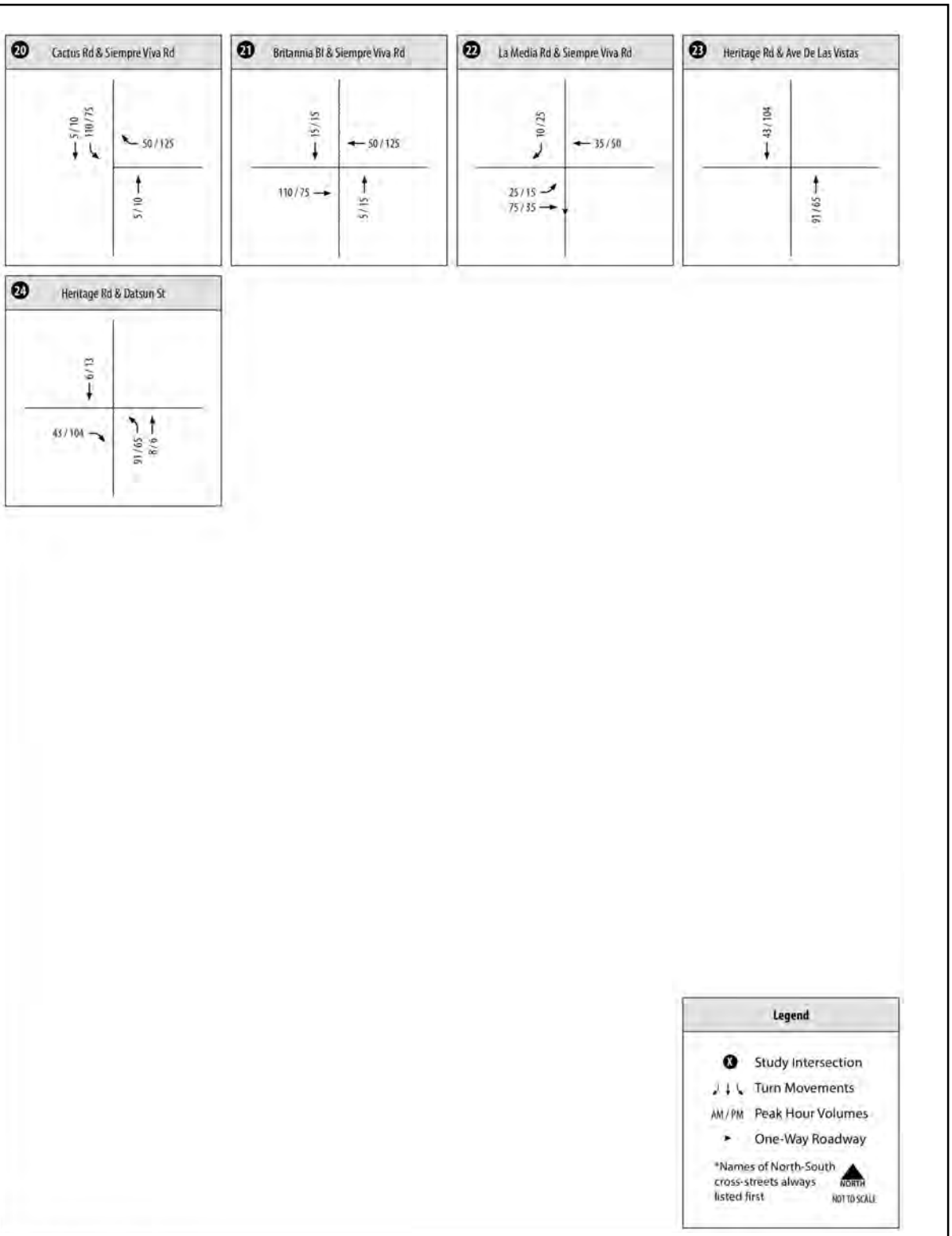


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-11)

Figure 19

Not to Scale

PROJECT ONLY TRAFFIC (FULL DEVELOPMENT) – BUILDOUT OF COMMUNITY PLAN TRIP ASSIGNMENT (1 OF 2)

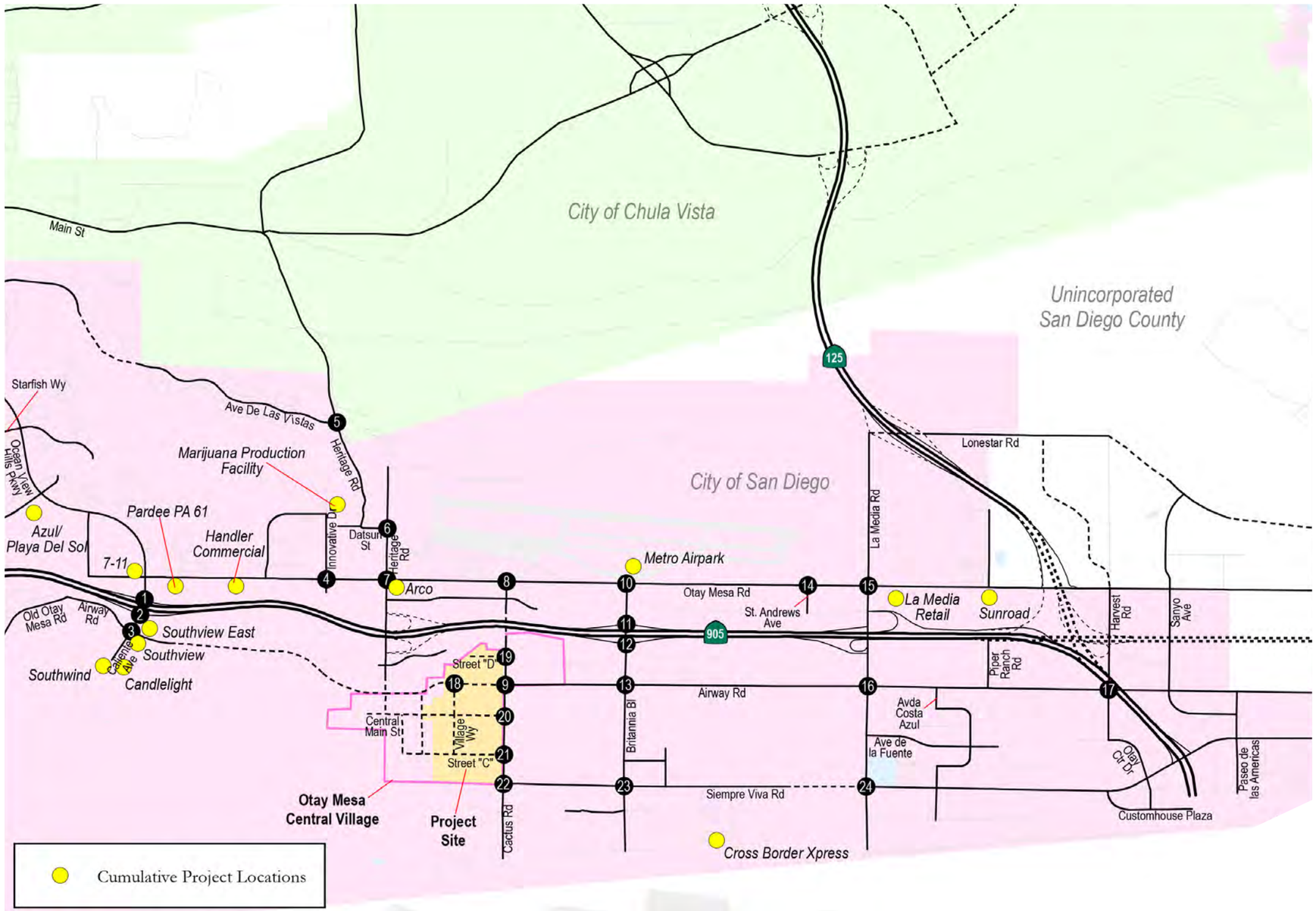


Source(s): Chen Ryan (02-20-2019, TIS Figure 3-11)

Figure 19

Not to Scale

PROJECT ONLY TRAFFIC (FULL DEVELOPMENT) – BUILDOUT OF COMMUNITY PLAN TRIP ASSIGNMENT (2 OF 2)

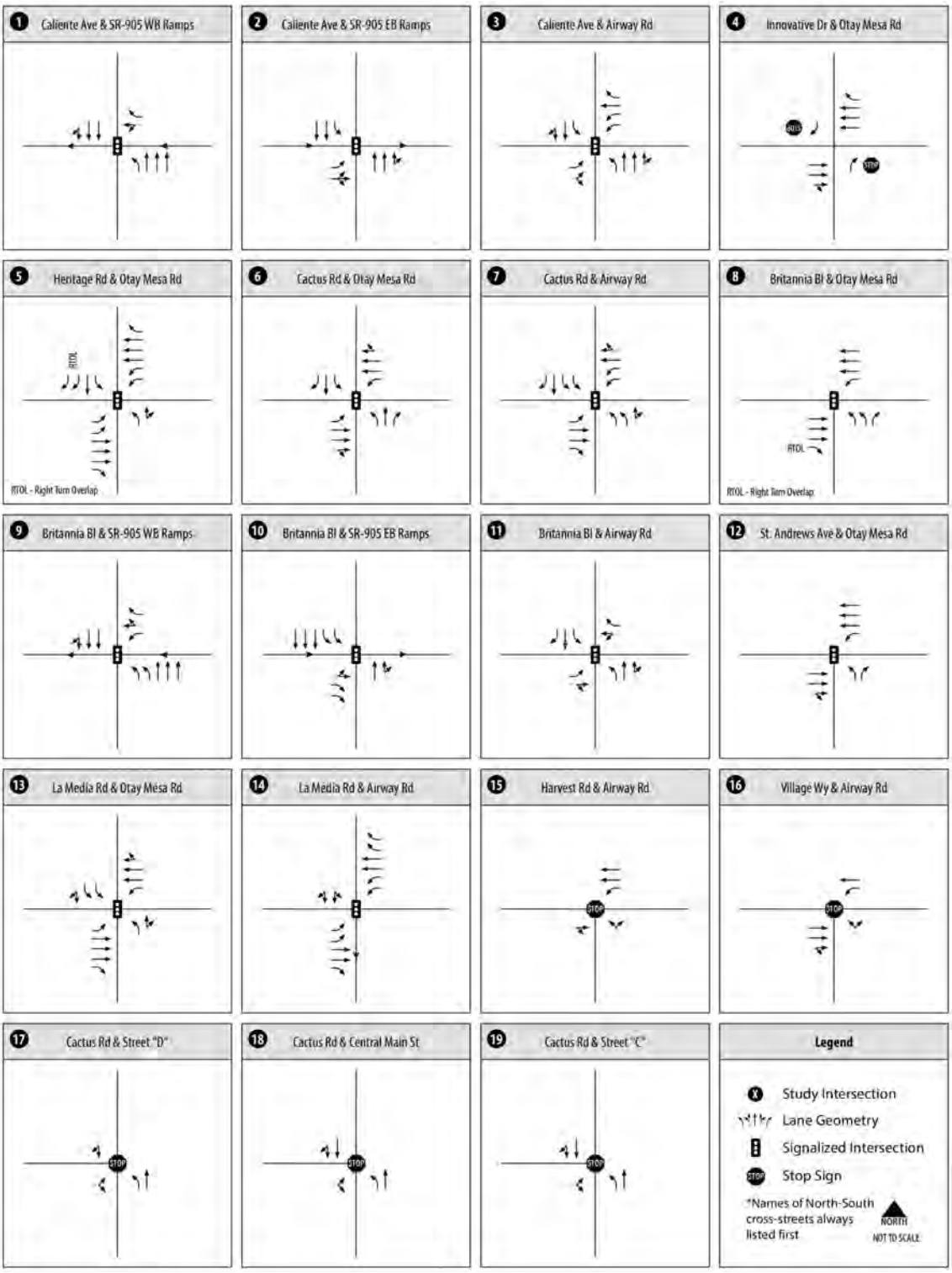


Source(s): Chen Ryan (02-20-2019, TIS Figure 6-1)

Figure 20

Not to Scale

PHASE 1 (2023) CUMULATIVE PROJECTS LOCATIONS MAP

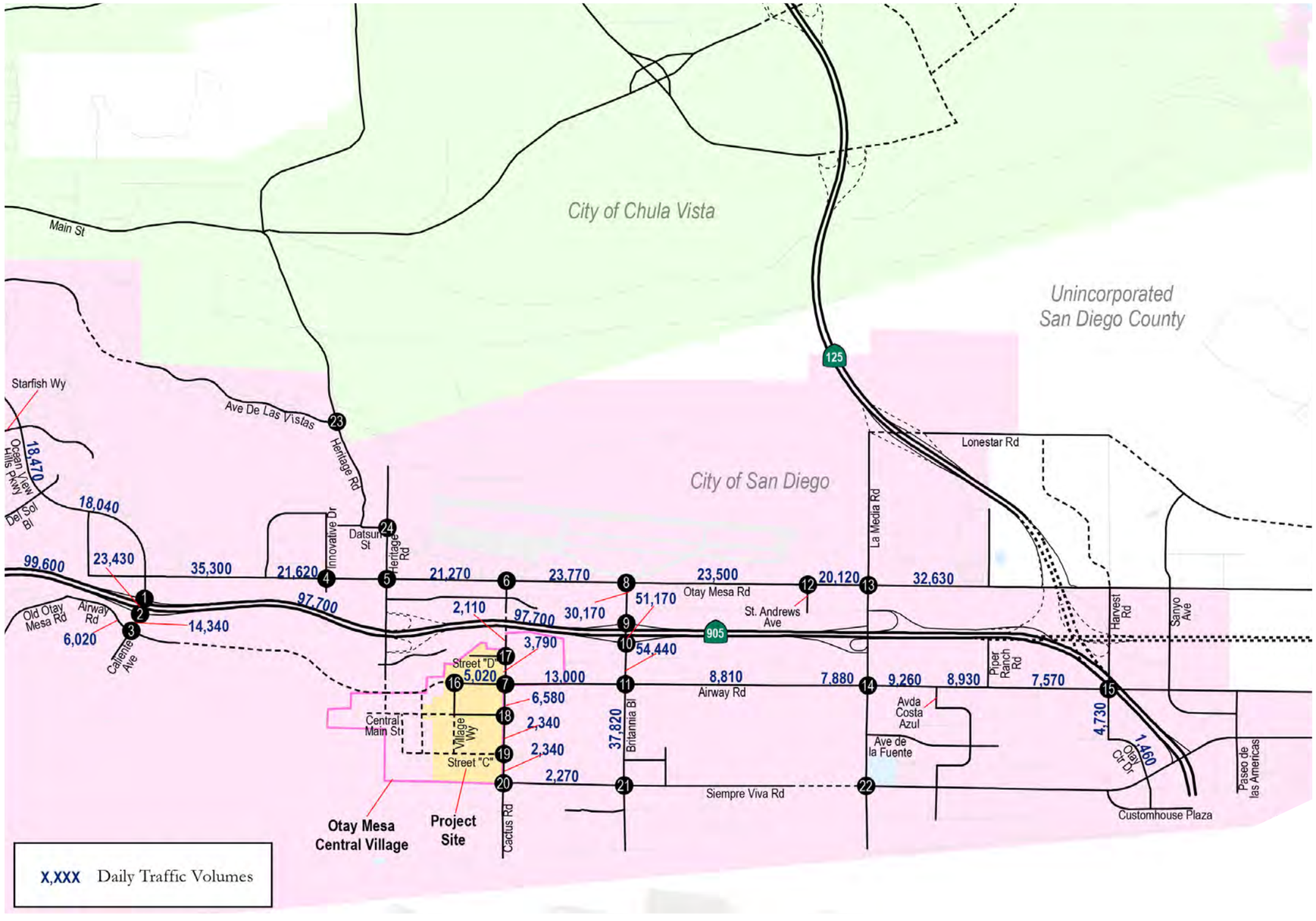


Source(s): Chen Ryan (02-20-2019, TIS Figure 7-2)

Figure 21

Not to Scale

NEAR-TERM (2023) PLUS PROJECT (PHASE 1) INTERSECTION GEOMETRICS

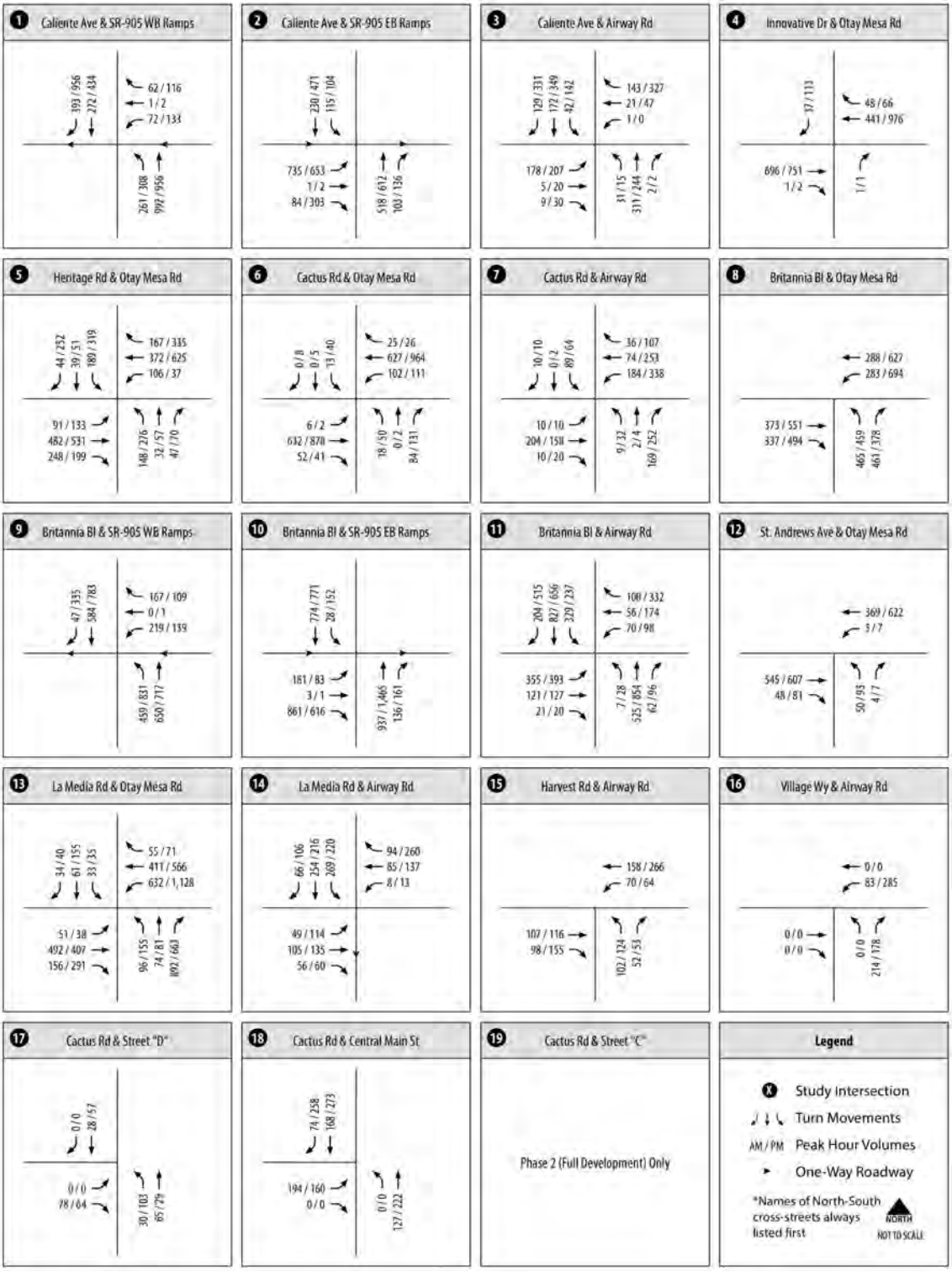


Source(s): Chen Ryan (02-20-2019, TIS Figure 7-3)

Figure 22

Not to Scale

NEAR-TERM (2023) PLUS PROJECT (PHASE 1)
ROADWAY SEGMENT VOLUMES

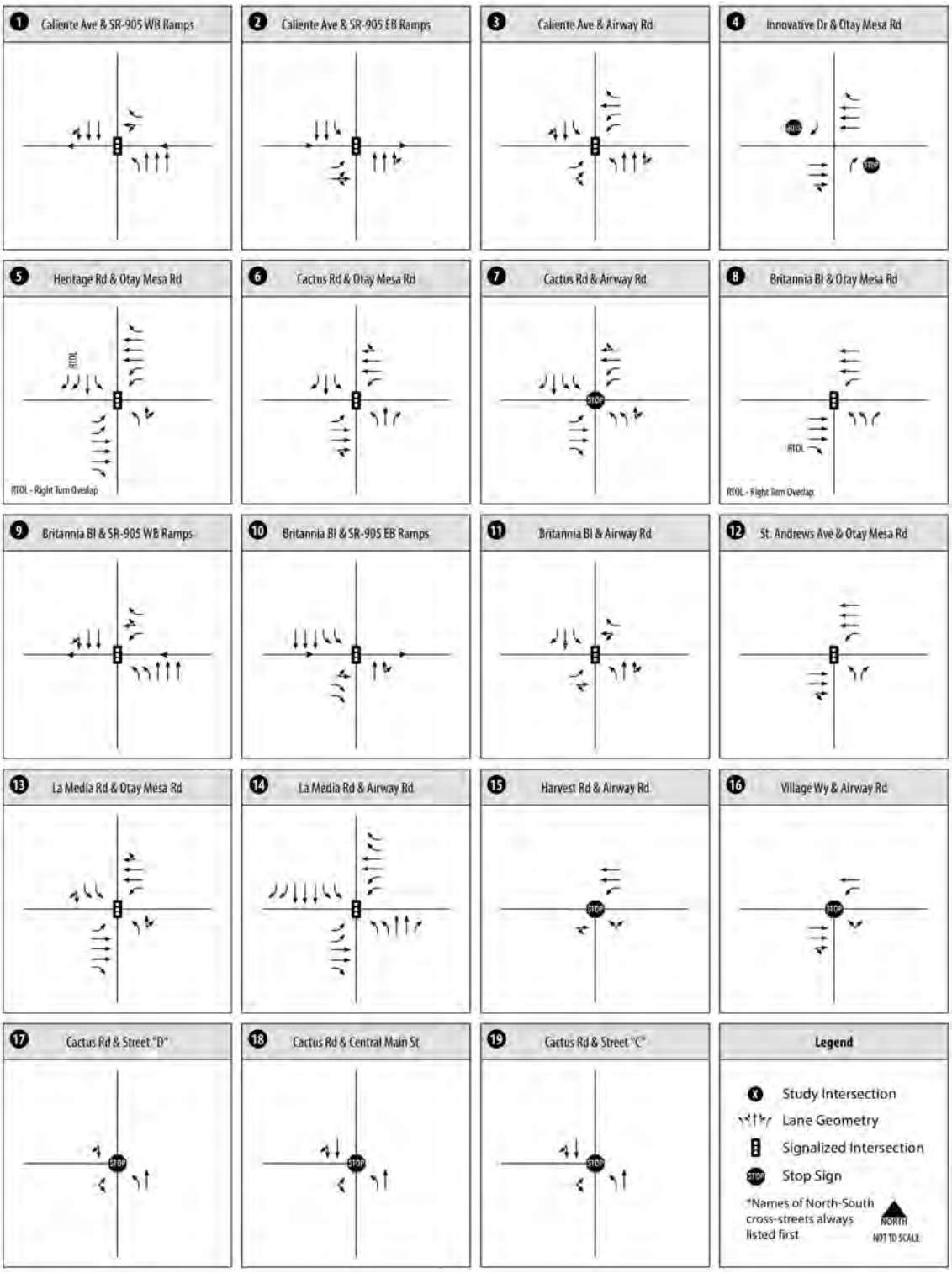


Source(s): Chen Ryan (02-20-2019, TIS Figure 7-4)

Figure 23

Not to Scale

NEAR-TERM (2023) PLUS PROJECT (PHASE 1) AM/PM PEAK HOUR INTERSECTION VOLUMES

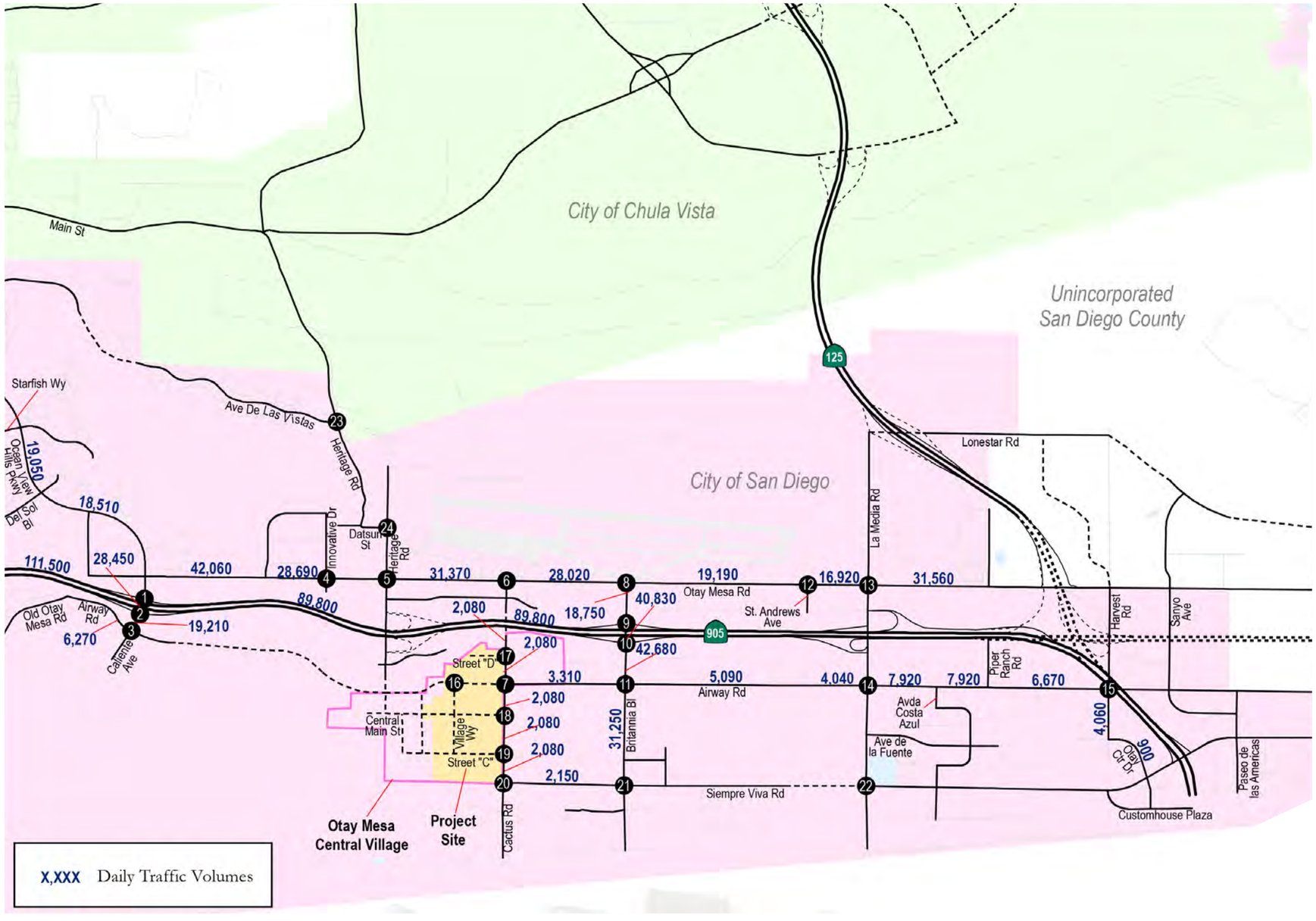


Source(s): Chen Ryan (02-20-2019, TIS Figure 9-2)

Figure 24

Not to Scale

NEAR-TERM (2027) PLUS PROJECT (FULL DEVELOPMENT) INTERSECTION GEOMETRICS

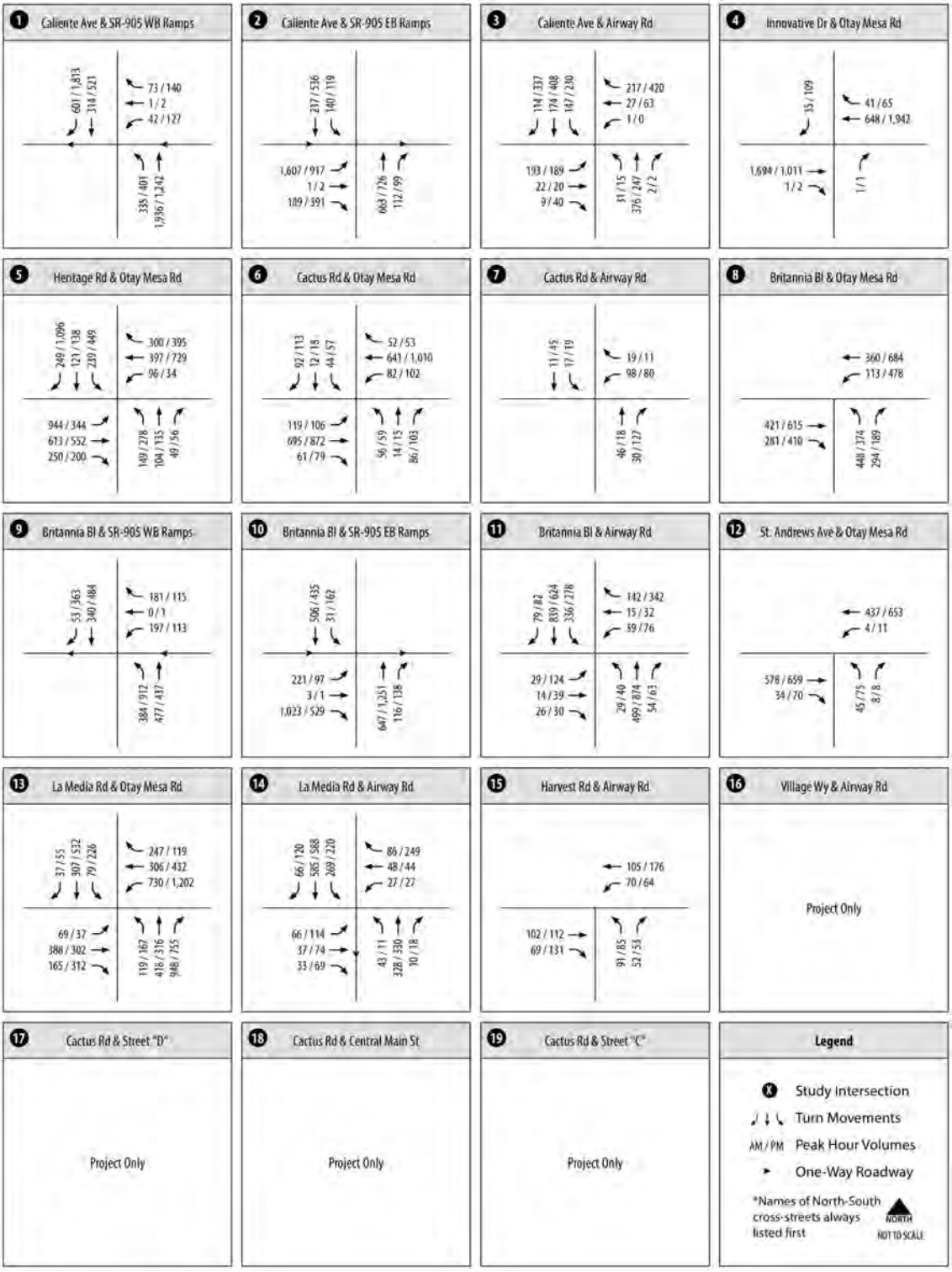


Source(s): Chen Ryan (02-20-2019, TIS Figure 8-3)

Figure 25

Not to Scale

NEAR-TERM (2027) PLUS PROJECT (FULL DEVELOPMENT) ROADWAY SEGMENT VOLUMES

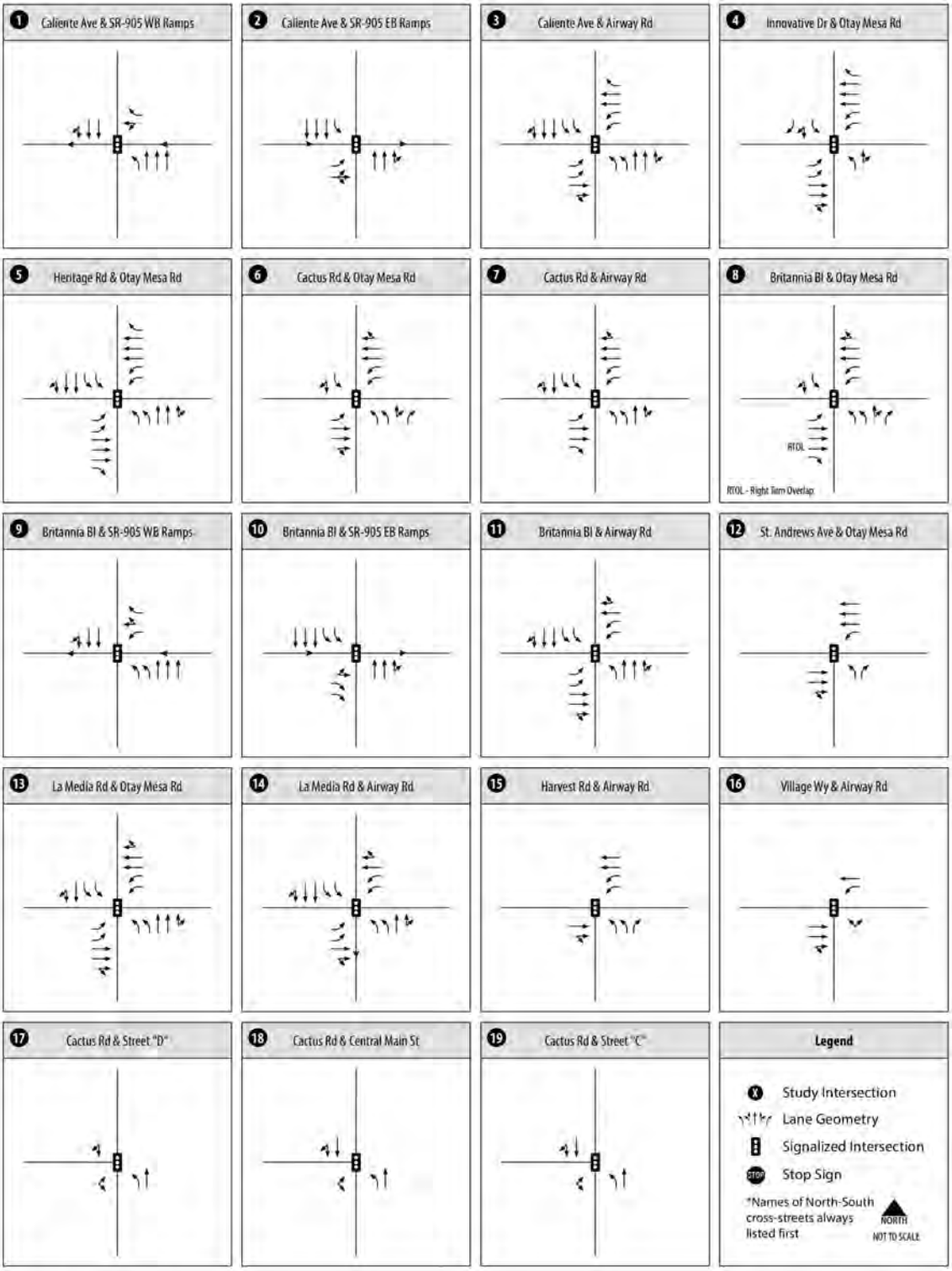


Source(s): Chen Ryan (02-20-2019, TIS Figure 8-4)

Figure 26

Not to Scale

NEAR-TERM (2027) PLUS PROJECT (FULL DEVELOPMENT) AM/PM PEAK HOUR INTERSECTION VOLUMES

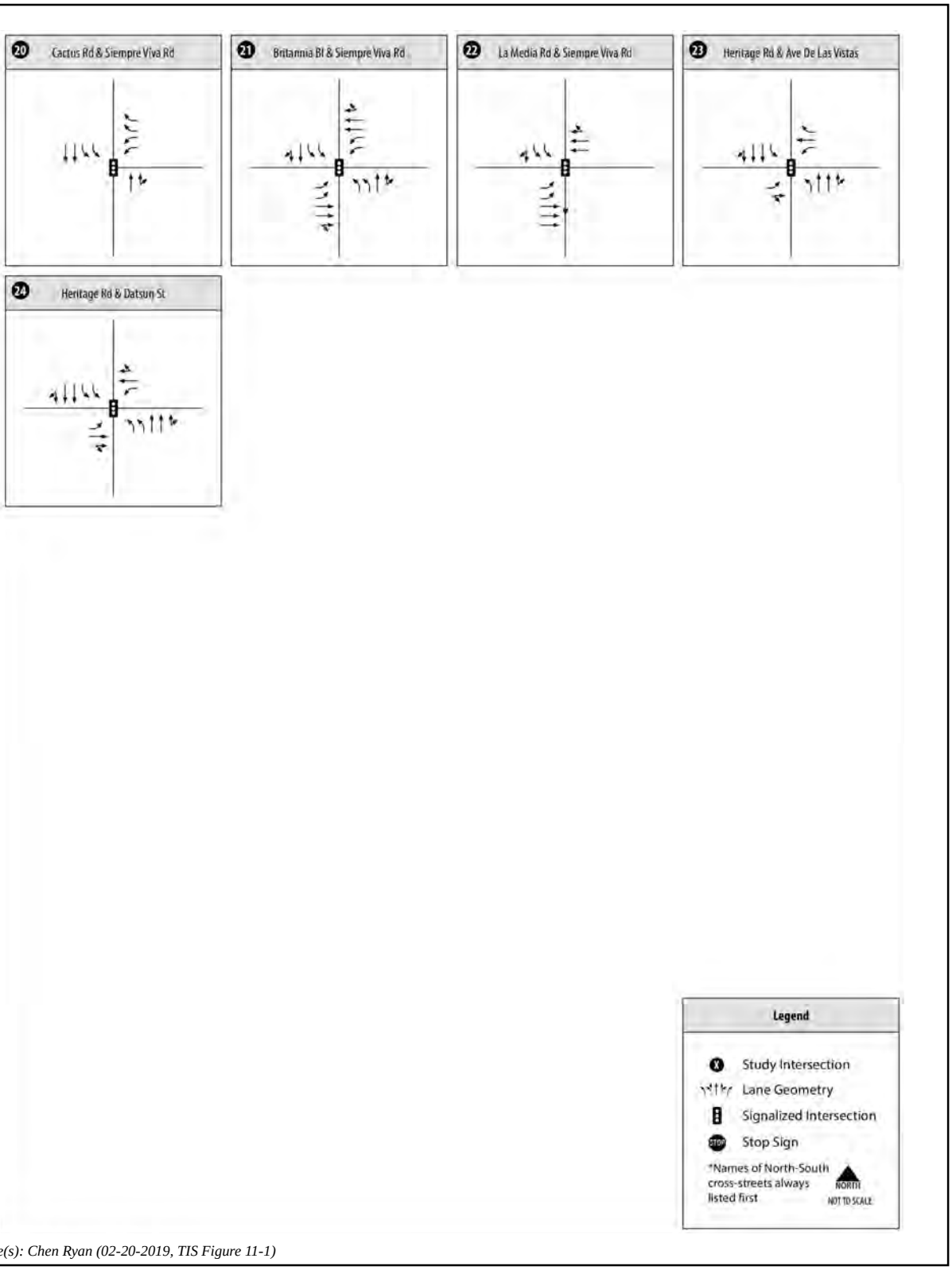


Source(s): Chen Ryan (02-20-2019, TIS Figure 11-1)

Figure 27

Not to Scale

BUILDOUT OF COMMUNITY PLAN PLUS PROJECT (FULL DEVELOPMENT) INTERSECTION GEOMETRICS (1 OF 2)

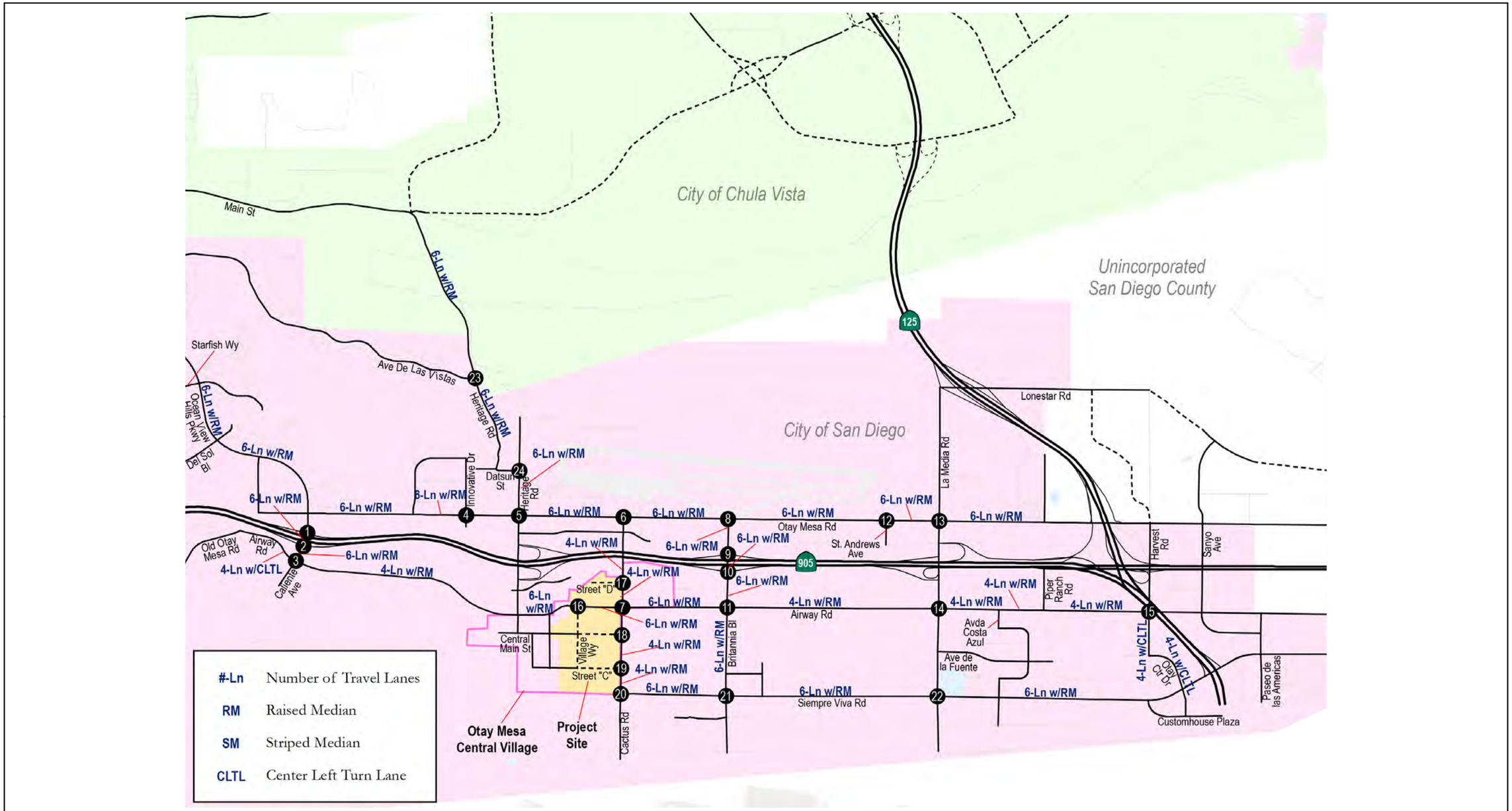


Source(s): Chen Ryan (02-20-2019, TIS Figure 11-1)

Figure 27

Not to Scale

BUILDOUT OF COMMUNITY PLAN PLUS PROJECT (FULL DEVELOPMENT) INTERSECTION GEOMETRICS (2 OF 2)

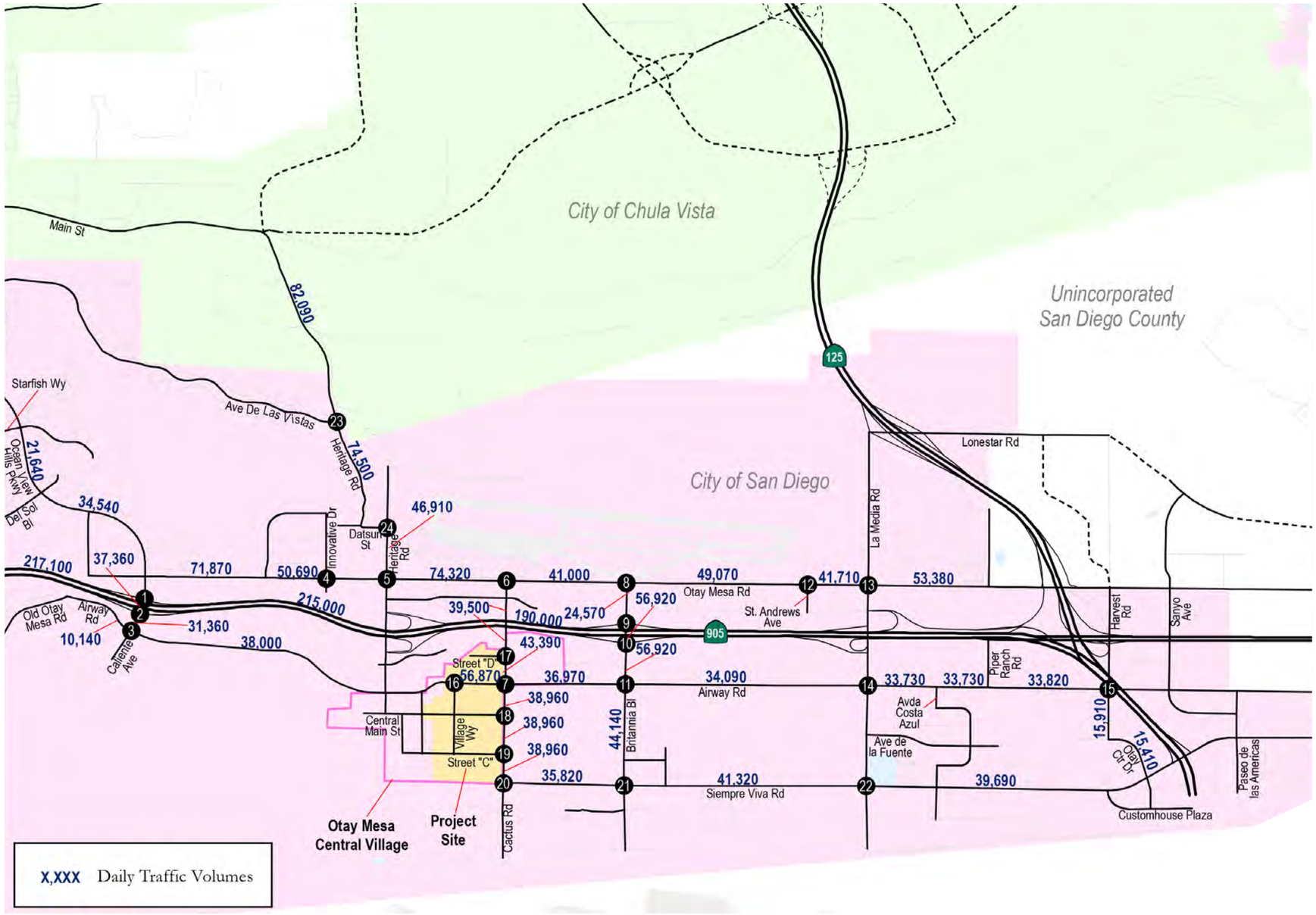


Source(s): Chen Ryan (02-20-2019, TIS Figure 10-1)

Not to Scale

Figure 28

BUILDOUT OF COMMUNITY PLAN ROADWAY GEOMETRICS

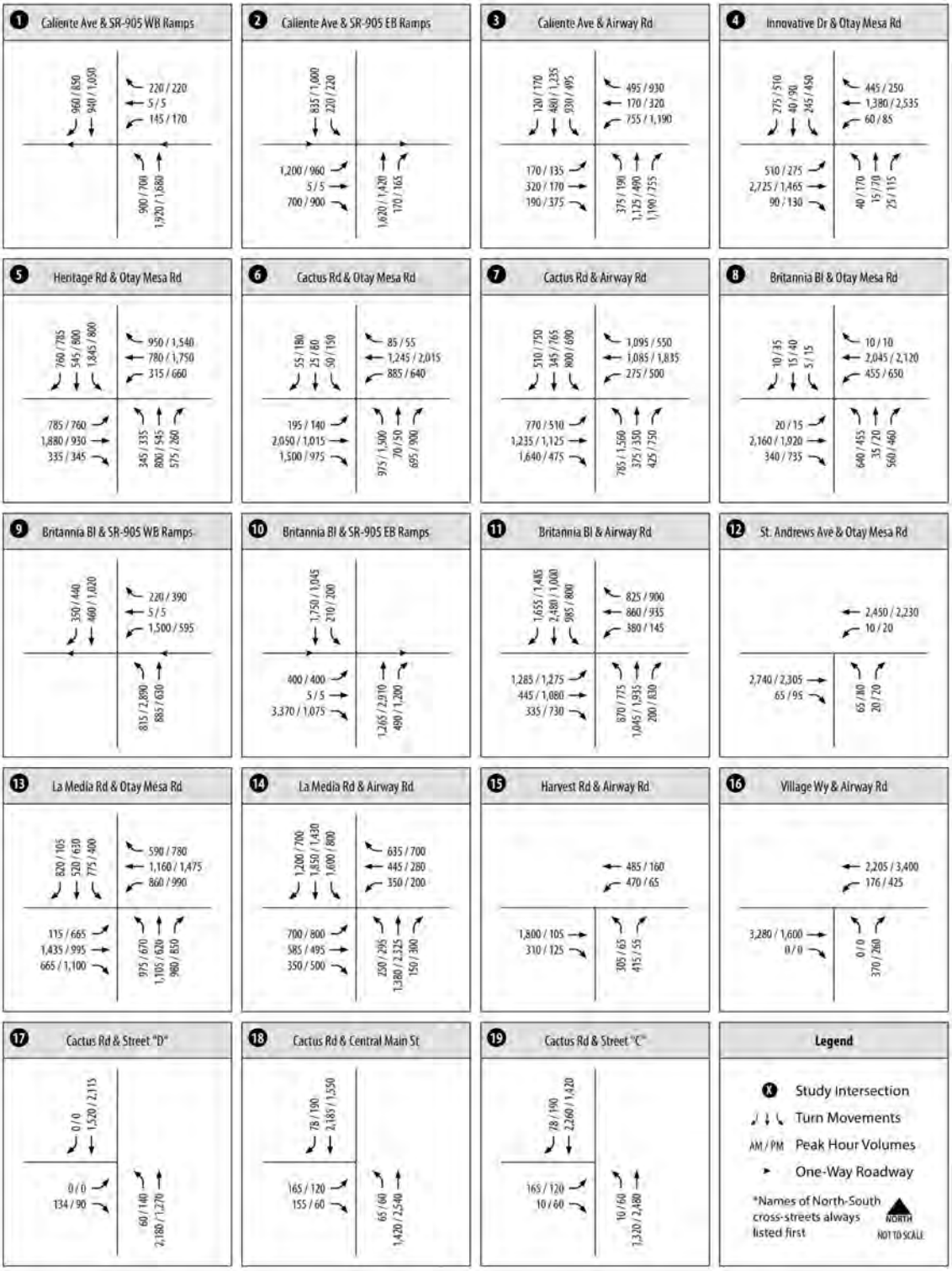


Source(s): Chen Ryan (02-20-2019, TIS Figure 11-2)

Figure 29

Not to Scale

BUILDOUT OF COMMUNITY PLAN PLUS PROJECT (FULL DEVELOPMENT) ROADWAY SEGMENT VOLUMES

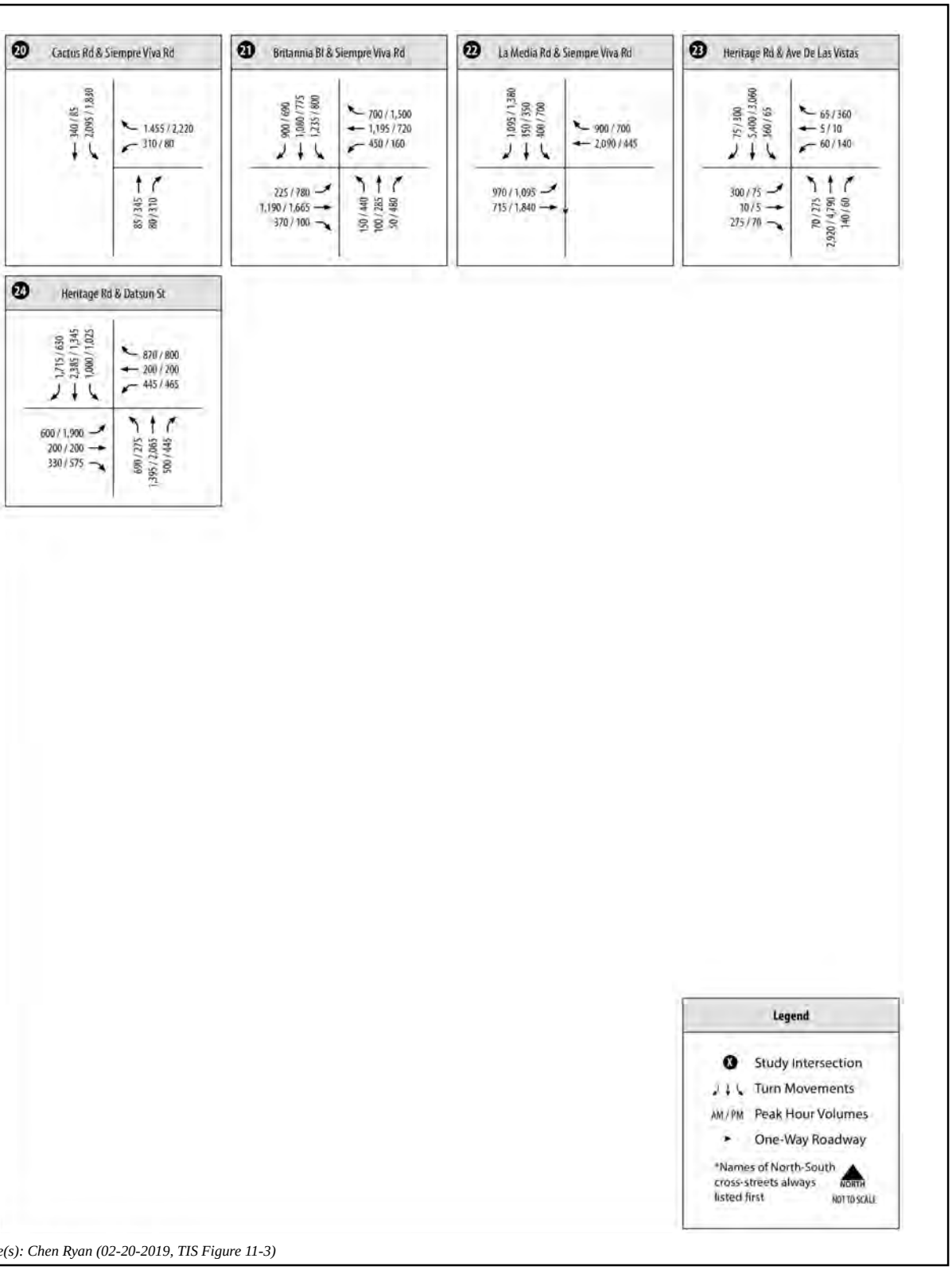


Source(s): Chen Ryan (02-20-2019, TIS Figure 11-3)

Figure 30

Not to Scale

BUILDOUT OF COMMUNITY PLAN PLUS PROJECT(FULL DEVELOPMENT)
AM/PM PEAK HOUR INTERSECTION VOLUMES (1 OF 2)



Source(s): Chen Ryan (02-20-2019, TIS Figure 11-3)

Figure 30

Not to Scale

BUILDOUT OF COMMUNITY PLAN PLUS PROJECT(FULL DEVELOPMENT)
AM/PM PEAK HOUR INTERSECTION VOLUMES (2 OF 2)