THE CITY OF SAN DIEGO

ADDENDUM PROJECT No. 371807
TO PROGRAM
ENVIRONMENTAL IMPACT REPORT No. 30330/304032/
SCH No. 2004651076

SUBJECT: SOUTHVIEW EAST A REZONE (RZ), TENTATIVE MAP (TM), PLANNED DEVELOPMENT PERMIT (PDP), AND AN AMENDMENT TO SITE DEVELOPMENT PERMIT NO. 25170, to rezone 16.1 acres from AR-1-1 to RM-2-6, and 5.1 acres from AR-1-1 to OR-1-2, and to create two subdivisions to allow for the construction of 86 multi-family residential condominium units, on a vacant 21.2 acre site. The Project also proposes two deviations for setbacks and wall heights, as well as several improvements which are further discussed in Section I. The subdivisions would be separated by Airway Road on approximately 8.3 acres, and an open space/habitat preserve area totaling approximately 12.9 acres located east of proposed subdivisions would be a portion of the 21.2-acre site. The Project site is located east of Caliente Avenue, south of State Route 905 (SR-905) and Otay Mesa Road within in the AR-1-1 (Agricultural-Residential) and RM-2-6 (Residential-Multiple Unit) zones of the Otay Mesa Community Planning area, Brush Management, Very High Fire Hazard Severity Zones, Airport Land Use Compatibility Overlay Zone (ALUCOZ), Airport Influence Area (Review Area 2), the Federal Aviation Administration (FAA) Part 77 Notification Area, and 5.0 acres of Multi-Habitat Planning Area (MHPA). (LEGAL DESCRIPTION: Remainder Lot of Southview, In the City of San Diego, County of San Diego, State of California, According to Map No. 15984, Filed in the Office of the County Recorder of San Diego County on July 16, 2014, Assessor's Parcel Number 645-081-03). *Applican*t: Cornerstone Communities Corporation

I. PROJECT DESCRIPTION:

A REZONE (RZ), TENTATIVE MAP (TM), PLANNED DEVELOPMENT PERMIT (PDP), AND AN AMENDMENT TO SITE DEVELOPMENT PERMIT (SDP) No. 25170, to rezone 16.1 acres from AR-1-1 to RM-2-6, and 5.1 acres from AR-1- to OR-1-2, and to create two subdivisions to allow for the construction of 86 multi-family residential condominium units, on a vacant 21.2 acre site. The project proposes two deviations for setbacks and wall heights, as well as several improvements which are further discussed below. The subdivisions would be separated by Airway Road. The parcel would be subdivided from one lot into six lots for the construction of two multi-family residential condominium subdivisions on approximately 8.3 acres, and an open space/habitat preserve area would be located on approximately 12.9 acres. A summary of the proposed six lots is shown in Table 1.

Table 1 – Lot Summary Table

Lot Number	Description	Area (in acres)
1	Multi-family residential condominiums	3.138
2	Multi-family residential condominiums	2.499
3	Homeowners Association	1.398
4	Homeowners Association	1.235
5	Multi-Habitat Planning Area/Open Space	8.163
6	Multi-Habitat Planning Area/Open Space	4.738
Total Area		21.171

The subdivision north of Airway Road would consist of 46- multi-family condominium units that would be a continuation of the Tesoro Subdivision Project that is currently under construction; and would consist of 11 buildings, with 3, 4 or 5 units per building. The subdivision south of Airway Road would consist of a 40 multi-family condominium units that would be a continuation of the adjacent Vista del Sur Subdivision Project; and the southerly subdivision would consist of eight buildings each containing five units. Each building in both subdivisions would be three stories in height, with a maximum height of 35 feet above finished grade. Each condominium unit would have a ground floor private yard area. The northerly subdivision would share the main recreation area and other common area amenities with the adjacent Tesoro Project and would annex into the Homeowners Association (HOA) for the Tesoro Project. The southerly subdivision would share the main recreation area and other common area amenities with the adjacent Vista del Sur Project and would annex into the HOA for Vista Del Sur.

Each subdivision would provide private driveway improvements and the necessary private utility improvements required to serve the property, as well as privately maintained water quality treatment and detention facilities to handle the project's stormwater run-off requirements. Each subdivision would have landscape common areas planted, irrigated, and maintained by the HOA. A permanent barrier (fence/wall) to deter public access from the MHPA area would be placed along the northern and eastern boundaries of both subdivisions.

The project also includes the reservation of right-of-way (ROW) and an Irrevocable Offer to Dedicate (IOD) that ROW for the future extension of Airway Road from its current terminus on site to the eastern property boundary.

The following deviations are proposed:

- The perimeter setback deviation for Lot 1 would allow a 15-foot front yard setback where 20 feet is required and a 10-foot interior side yard setback where 94 feet (10% of lot width) is required. For Lot 2 the deviation would allow a 15-foot front yard setback where 20 feet is required and a 10-foot interior side yard setback where 68 feet (10% of lot width) is required. Based on the overall design and that this project is a continuation of the approved developments to the west, reducing the setbacks will allow the project to better integrate with the adjacent multi-family projects. Additionally, the reduced setback will allow the development area to shift to the west, closer to the existing development and away from the open space and MHPA lands to the east.

- The retaining wall deviation would allow a maximum wall height of eight feet where six feet is allowed. The areas of deviation would be the noise attenuation wall along the SR-905 frontage and portions of the downslope walls which face the open space areas.

Project construction, including grading that would occur in one phase and building construction that would occur in several phases, over a period of 24 months. Project implementation would consist of 1,516 cubic yards (cy) of cut, and 133,490 cy of fill, and require the import of 131,974 cy of fill material. Maximum cut would be approximately 4 feet and maximum fill would be 25 feet as shown on the project grading plan. Fill material would be imported from the adjacent Tesoro and Vista Del Sur projects.

The northerly subdivision has a proposed Floor-to-Area (FAR) ratio of 0.62. The southerly subdivision has a proposed FAR of 0.63. Maximum allowable FAR for each subdivision is 1.5.

Parking would be provided as part of each of the subdivisions. City parking standards require 2.25 parking spaces per condominium unit, as well as 0.2 guest space per required non-guest space. Based on these requirements, the subdivision north of Airway Road requires 125 parking spaces, while the subdivision south of Airway Road requires 108 parking spaces. The subdivision north of Airway Road would provide 125 parking spaces, consisting of 97 covered parking spaces and 28 open parking spaces. The subdivision south of Airway Road would provide 108 parking spaces, consisting of 72 covered spaces and 36 open spaces. Additionally, required motorcycle parking at each subdivision is 0.1 space per unit, resulting in a need for 5 motorcycle parking spaces at the northerly subdivision and 4 motorcycle spaces at the southerly subdivision. The motorcycle spaces would be provided, as required, with 5 spaces provided at the northerly subdivision, and 4 spaces provided at the southerly subdivision. Parking would be provided commensurate with the occupancy permits of each building. A portion of the parking spaces in both subdivisions would be equipped with electric vehicle charging infrastructure.

Plantable retaining walls would be constructed along the northern boundary of the northern subdivision, adjacent to SR-905, and also along the southern boundary of the northern subdivision, adjacent to Airway Road. The wall along the northern boundary of the northern subdivision would be 45 feet in length, with a minimum height of 0.5 feet to a maximum height of 7.2 feet. Two walls would be placed along the southern boundary of the northern subdivision. One wall would be 290 feet in length, with a minimum height of 1 foot and a maximum height of 5 feet. A second wall would be located slightly north of the first wall and would be 185 feet in length, with a minimum height of 0.5 feet and a maximum height of 3.3 feet. The Project includes an 8-foot high barrier along the north top of slope facing SR-905 in the northerly subdivision, from the northwest site boundary corner around the east end. It would be approximately 306 feet in length.

II. ENVIRONMENTAL SETTING:

The vacant 21.2 acre site is located south of SR-905 and Otay Mesa Road, and east of Caliente Avenue and San Ysidro High School. Airway Road intersects the site and forms a cul-de-sac in the western portion of the site. The upper portion of Spring Canyon is located in the northeast portion of the site, with slope heights of about 30 to 40 feet. Surface drainage currently flows toward the southeast into the canyon.

Surrounding land uses include State Route (SR)-905 to the north, San Ysidro High School is located approximately 0.2 mile to the west, and vacant land to the east and south. Construction of residential use projects (Tesoro and Vista del Sur Subdivisions) is currently underway immediately to the west of the Project site.

Topographically, the property is characterized by mesa land with nearly flat to gently inclined ground surfaces over most of the site. A berm approximately 5 to 7 feet high and 25 feet wide is present along the southern edge and around the southeast corner of the site. Ground surfaces over much of the property are generally flat to gently sloping due to previous cultivation over many years. The southern and western portions of the property generally slope down from southwest to northeast toward a canyon drainage located within the eastern central portion of the site. The northern portion of the property generally slopes down from north to south toward the same canyon. The edges of the canyon have slope heights of about 30 to 40 feet. Site elevations vary from a high of approximately 529 feet Mean Sea Level (MSL) in the western portion of the site to a low of approximately 505 feet MSL near the edge of the canyon in the eastern central portion of the site. The bottom of the canyon slopes down to an elevation of approximately 467 feet MSL at the eastern property line.

The project is located within the Otay Mesa Community Planning area, Brush Management, Very High Fire Hazard Severity Zones, Airport Land Use Compatibility Overlay Zone (ALUCOZ), Airport Influence Area (Review Area 2), and the Federal Aviation Administration (FAA) Part 77 Notification Area.

III. PROJECT BACKGROUND:

The Otay Mesa Community Planning (OMCP) area encompasses approximately 9,300 acres located in the southeastern portion of the City of San Diego, just north of the United States International Border with Mexico.

A comprehensive update to the adopted 1981 Otay Mesa Community Plan was conducted by the City and approved in 2014. The update to the OMCP was undertaken to address substantial land use changes, both locally and regionally, that have occurred over the past 25 years. The update to the OMCP was guided by the framework and policy direction in the 2008 City of San Diego General Plan and reflects new citywide policies and programs from the General Plan for the OMCP area. The OMCP contains a plan for land use and circulation with the planning area and includes the following nine elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation, along with a chapter pertaining to Implementation.

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

Discretionary actions required to implement the OMCP, and addressed in the OMCP Final Environmental Impact Report (hereafter "OMCP FEIR"), included: adoption of the OMCP and

associated actions; approval of a General Plan Amendment; rescission of the Otay Mesa Development District (OMDD); and adoption of amendments to the City's Land Development Code (LDC) to include of an "International Business and Trade" (IBT) Zone and the IP-3-1 Zone to implement the proposed Business Park – Residential Permitted (BPRP) land use category; adoption of two Community Plan Implementation Overlay Zones (CPIOZs); and adoption of an updated Public Facilities Financing Plan (PFFP). The OMCP FEIR was adopted on March 25, 2014 by the City of San Diego City Council. A Mitigation Monitoring and Reporting Program, Findings, and Statement of Overriding Considerations for the Comprehensive Update to the OMCP were also adopted on that date.

The Southview Development Project was included in the OMCP update approved in 2014 and encompasses the adjacent Southview West Project (i.e., Tesoro and Vista del Sur subdivisions), as well as the Southview-East Project addressed in this Addendum. The Southview Development Project was originally approved for 553 dwelling units (du) under the "multiple dwelling unit (over 20 du/ac)" land use in 2006. However, the Southview Development Project was subsequently split into two sub-projects, Southview-West (277 du) and Southview-East (86 du) to be processed separately due the presence of fairy shrimp on the eastern portion of the property and the fact that a 2006 Federal District Court ruling determined that the City's Multiple Species Conservation Program (MSCP) Subarea Plan did not provide adequate protection for Riverside fairy shrimp. In response to the Federal District Court ruling, the City surrendered its permit coverage for seven vernal pool species, including the San Diego fairy shrimp, and the United States Fish and Wildlife Service (USFWS) subsequently cancelled the City's Incidental Take Permit as it applied to those seven species (USFWS 2011). Therefore, the City could not process permits for impacts to the species on the Southview- East sub-project. As such, the City allowed the Southview–West Project to proceed while they worked on obtaining new approvals from the USFWS for a new Incidental Take Permit for the projects having impacts to any of the seven vernal pool species, such as the Southview-East Project.

The City is in the process of completing a vernal pool Habitat Conservation Plan (HCP) in order to enter into an Implementing Agreement for a new Federal Incidental Take Permit for those seven vernal pool species. Until that time, development involving take of any of the seven vernal pool species requires authorization from the USFWS through the Federal Incidental Take process. For the future extension of Airway Road, authorization for impacts to San Diego fairy shrimp would be processed by the City through its Federal Incidental Take Permit (vernal pool HCP); if unavailable, consultation with the USFWS would be required. The Southview East subdivision Project would not have impacts to fairy shrimp, as discussed below.

IV. DETERMINATION:

The City of San Diego previously prepared an Environmental Impact Report (EIR) for the OMCP and has attached the conclusions of the FEIR to this Addendum.

Based upon 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.

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

Impact Analysis Summary

Project approval for the Southview-East Project would allow for the construction of the proposed multi-family condominium subdivisions and future extension of Airway Road (the Project includes the reservation of ROW and an IOD that ROW for the future extension of Airway Road from its current terminus on site to the eastern property boundary), a Circulation Element roadway in the OMCP. The analysis provided in this Addendum indicates that there are no new significant impacts that would result from the project and that all project-level impacts can be fully mitigated. A comparison of the Project's impacts related to those of the adopted OMCP FEIR is provided below in Table 2 and discussed in detail below the table.

Table 2 - Impact Assessment Summary

Resource Area	OMCP FEIR Analysis	Project-Level Analysis	Project Impact Conclusion	OMCP FEIR Mitigation	Project Level Mitigation
Land Use	Significant, but mitigated	No new impacts	Less than significant	Yes	No
Visual Effects and Neighborhood Character	Less than significant	No new impacts	Less than significant	No	No
Air Quality/Odor	Significant, unavoidable	No new impacts	Less than significant	Yes	No
Biological Resources	Significant, but mitigated	No new impacts	Less than significant	Yes	Yes
Historical Resources	Significant, but mitigated	No new impacts	Less than significant	Yes	Yes
Human Health/Public Safety/Hazardous Materials	Significant, but mitigated	No new impacts	Less than significant	Yes	No
Hydrology/Water Quality	Significant, but mitigated	No new impacts	Less than significant	Yes	No
Geology/Soils	Significant, but mitigated	No new impacts	Less than significant	Yes	No
Energy Conservation	Less than Significant	No new impacts	Less than significant	No	No

Table 2 - Impact Assessment Summary (con't)

Noise	Significant, unavoidable	No new impacts	Less than significant	Yes	Yes
Paleontological Resources	Significant, but mitigated	No new impacts	Less than significant	Yes	No
Traffic/Circulation	Significant, unmitigated	No new impacts	Less than significant	Yes	No
Public Services	Less than significant	No new impacts	Less than significant	No	No
Utilities	Significant, unavoidable	No new impacts	Less than significant	Yes	No
Water Supply	Less than significant	No new impacts	Less than significant	No	No
Population and Housing	Less than significant	No new impacts	Less than significant	No	No
Agricultural and Mineral Resources	Less than significant	No new impacts	Less than significant	No	No
Greenhouse Gas Emissions	Significant, unavoidable	No new impacts	Less than significant	Yes	No

This Addendum to the OMCP FEIR includes the following analysis to demonstrate that environmental impacts associated with the Project are consistent with the conclusions reached in the OMCP FEIR. The only modification to the Project analyzed in the OMCP FEIR is related to the fact that the Southview-East Project would result in fewer residential units than anticipated in the prior analysis, as summarized below.

Land Use

FEIR

The OMCP FEIR identifies less than significant impacts for the OMCP's consistency with local plans. Based on the OMCP FEIR, the goals, policies, and programs of the OMCP are consistent with existing applicable local land use plans, policies, and regulations, including the General Plan, Land Development Code (Zoning) and Otay Mesa Development District, Brown Field Airport Land Use Compatibility Plan, and San Diego Association of Governments (SANDAG) Regional Comprehensive Plan and Regional Transportation Plan.

Regarding land use impacts associated with collocation (the placement of residential and industrial land uses in proximity to one another), the OMCP FEIR identifies less than significant impacts as individual projects would be required to comply with OMCP and General Plan policies, which are necessary to reduce or avoid potential land use incompatibility impacts (including noise, odor, air quality, traffic, parking, trucks, hazardous materials) as well as local, state and federal regulations. Additionally, the OMCP FEIR discusses impacts associated with the conversion of industrial and agricultural lands to residential and other mixed uses. Environmental effects associated with this conversion include the increased potential for exposure of sensitive receptors to hazardous materials. However, with implementation of OMCP FEIR Mitigation Framework Measure HAZ-3 (in the Human Health/Public Safety/Hazardous Materials FEIR section), impacts would be less than significant.

The OMCP FEIR discusses impacts associated with regulation consistency, including the Environmentally Sensitive Lands (ESL), Historical Resources, and Brush Management Regulations. The OMCP development footprint encroaches into ESL areas. The OMCP FEIR identifies less than significant impacts to ESL areas on a program-level, as individual future projects would be required to comply with ESL Regulations or process a Site Development Permit (SDP) to deviate from the regulations. During future project development, appropriate site-specific mitigation would be determined in accordance with OMCP FEIR Mitigation Framework Measure LU-2, and measures BIO-1 through BIO-4. The OMCP FEIR identifies potentially significant impacts to historical resources, which is reduced to a less than significant level through several OMCP policies and development regulations, as well as incorporation of mitigation framework measures for historical resources contained in the Historical Resources section of the FEIR (i.e., HIST-1 and HIST-2). As discussed in the OMCP FEIR, compliance with the City's Brush Management Regulations would be accomplished at the project level as part of the development review and permit approval process. Impacts associated with compliance with the Brush Management Regulations would be less than significant.

The OMCP FEIR also includes an analysis of environmental plan consistency. Specifically, consistency with the City's MSCP Subarea Plan and the Multi-Habitat Planning Area (MHPA). Future development implemented in accordance with the OMCP may propose an adjustment to the MHPA boundary; however, given that boundary adjustments require equal or better biological values and must meet MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies, boundary adjustments would be considered less than significant. Potential indirect impacts would be evaluated at the project-level for consistency with the MHPA Land Use Adjacency Guidelines, resulting in a program-level less than significant impact. The OMCP FEIR includes Mitigation Framework Measure LU-2, which addresses MHPA adjacency impacts at the project-level. The OMCP FEIR identifies no significant impact relating to MSCP consistency upon implementation of the measures in the OMCP FEIR.

PROPOSED PROJECT

Community Plan/General Plan

The Project site is designated for Medium Residential (15-29 dwelling units per acre) and Open Space and is located within the Southwest District of the OMCP and designated for Residential in the General Plan Land Use Map. The Project is consistent with the General Plan land use designation for the site. According to the OMCP, the Southwest District would be primarily residential in nature, with a core mixed-use center including civic, and neighborhood-serving commercial uses and services. The Project would be consistent with the proposed land uses analyzed in the OMCP FEIR as being developed with Medium Residential uses and Open Space. The underlying zone of AR-1-1 would be modified to RM-2-6, which technically allows up to 35 du/ac but is restricted to a maximum of 29 du/ac under the Medium Residential land use designation in the OMCP.

Land Development Code

The existing site zoning of AR-1-1 and was not revised as part of the OMCP approval process to reflect the land use designation for the site. Therefore, the Project would rezone the site from AR-1-1 to RM-2-6 and OR-1-2. The RM-2-6 zone allows up to 35 du/ac but is restricted to a maximum of 29 du/ac under the Medium Residential land use designation in the OMCP. The OR-1-2 would be placed in the area of the site occupied by the MHPA. The Project proposes 86 multi-family du on an

8.3-acre portion of the 21.2-acre Project site, with the remaining site area consisting of open space (12.9 acres). The Project is consistent with the OMCP and the proposed zoning would implement the uses envisioned in the OMCP. As discussed in the project description, the Project would comply with the development regulations in the RM-2-6 zone except for the two deviations related to perimeter setbacks and retaining wall heights. No secondary physical impacts are anticipated from these deviations because the perimeter setbacks and retaining wall height increase would not impact sensitive views along a scenic route or create a negative appearance (as discussed below under *Visual Effects and Neighborhood Character*). The OR-1-2 zone would be placed over the existing MHPA on the property.

Environmentally Sensitive Lands/MHPA
The eastern portion of the site contains Environmentally Sensitive Lands (ESL) due to the presence of sensitive biological resources. MHPA/open space uses are proposed across the most sensitive portions of the Project site and would not be developed. Additionally, the MHPA/open space area would be put into a Covenant of Easement (in favor of the City, California Department of Fish and Wildlife [CDFW], and the USFWS).

Indirect impacts associated with drainage and toxics, night lighting, noise, public access to the MHPA areas on site were addressed in the project's Biological Technical Report. In addition, invasive plant species, brush management activities, grading/land development, and fugitive dust impacts from construction activities could also occur as a result of Project implementation. Construction activities during raptor breeding season would also result in indirect impacts to nesting raptors. These indirect impacts would be considered significant and Project-specific mitigation would be required in accordance with OMCP FEIR Mitigation Framework Measure LU-2. These mitigation measures are listed in the MMRP, Section V of this document. Mitigation would reduce Project-level impacts to a less than significant level.

In addition to compliance with the MSCP Land Use Adjacency Guidelines that require an analysis of potential indirect impacts from a Project (discussed in the paragraph above), the City's Subarea Plan provides additional policies and guidelines that require Project compliance. The Biological Technical Report identified several policies from the MSCP Subarea Plan that the Project would have potentially significant impacts to, including Construction and Maintenance policies; Fencing, Lighting, and Signage policies; Materials Storage; and General Management Directives. Inconsistencies with MSCP Subarea Plan policies would result in a potentially significant impact which would require mitigation. The Project-specific mitigation measures are listed in the MMRP, Section V of this document. Mitigation would reduce impacts to a less than significant level.

Historical Resources
An Archeological Survey and Evaluation Report was prepared for the Project by ASM Affiliates (June 2016), in accordance with Mitigation Framework Measure HIST-1. The Archeological Survey and Evaluation included a site-specific record and archival research, a cultural resources survey, including a Native American monitor, and the archaeological evaluation of a documented resource onsite. Based on the records search, 35 previously recorded cultural resources were identified within the 0.5-mile buffer surrounding the project area. Two of the 37 resources were located within the Project site (SDI-6941 and SDI-9541), with the remaining 35 resources located in the 0.5-mile buffer area. Site SDI-6941 consists of multiple loci. During the archaeological survey, two of the previously recorded cultural resources within the proposed Project site (SDI-6941 Locus K and SDI-

9541) were relocated, and their condition was observed to be very similar to what it was at the time of their last recording. The two other previously recorded loci of SDI-6941 (Locus J and portion of Locus L) were not relocated during the survey. Previous testing of the other loci of that site has resulted in the determination that the site is not eligible for the National Register of Historic Places (NRHR) or the California Register of Historic Resources (CRHR). SDI-6941, Locus K would not be impacted by the proposed Project as it is primarily outside of the proposed Project boundaries, and the portion of it that is within the Project boundaries is within an environmentally sensitive area that would be preserved by open space. Most of SDI-9541 is also outside of the proposed Project boundaries and the portion of it within the proposed Project boundaries is partially within an area proposed to be preserved by open space.

The test excavations conducted in the portion of SDI-9541 that is within the proposed Project boundaries but not within the area proposed to be preserved by open space (within areas proposed for development) indicates that that portion of the site does not possess significant cultural deposits that are eligible for the CRHR or considered significant under the California Environmental Quality Act. Therefore, potential impacts to it associated with the proposed Project would be less than significant. No further work is recommended for the non-significant portion of SDI-9541 that is within the proposed development boundaries. The remaining portion of SDI-9541 is within the open space portion of the Project site and would not be impacted by the Project. The portion of SDI-6941 Locus K that is within the proposed Project boundaries would not be impacted by the proposed Project as it is within an environmentally sensitive area that would be preserved by open space. SDI-6941 Loci J and L were previously determined to be part of a non-significant site and potential impacts to them associated with the proposed Project would be less than significant. As a result, no further work is recommended for SDI-6941 Locus J or the portions of Locus K or L that are within the proposed Project boundaries.

The Project Archeological Survey and Evaluation Report did not identify new significant impacts that were not already anticipated in the OMCP FEIR. Thus, no new impacts to historical resources would occur as a result of the Project. The Project would be required to implement monitoring during grading activities, consistent with standard City of San Diego requirements. A Native American monitor would be required to be present during grading and trenching. These Project-specific mitigation measures are listed in the MMRP, Section V of this document. The OMCP FEIR includes Mitigation Framework Measure LU-1b, which requires the Project to be subject to discretionary review to comply with Historical Resources Regulations.

Airports

The Project site is located within Review Area 2 of the Brown Field Municipal Airport Influence Area (AIA). Review Area 2 consists of areas within airspace protection and/or overflight notification areas. Limits on heights of structures are the only restrictions on land uses within Review Area 2. The recordation of overflight notification documents is also required within Review Area 2. Additionally, due to the Project's proximity to Brown Field Municipal Airport, future residents and owners of the proposed residences would be required to sign disclosures recognizing the presence of an airport nearby and that the property would be subject to aircraft overflights and noise at all hours, day and night, 365 days per year. The Project would also require FAA Part 77 Notification. Mitigation Framework Measure HAZ-2 from the OCMP FEIR, which requires the City to notify project applicants for future development of FAA requirements and ensure that the proper FAA notification and determinations have been made prior to future project approval, would reduce impacts to a less

than significant level. The Project would be required to comply with the structure height restrictions for Review Area 2, resident/owner disclosures, and FAA notification, and would also comply with Mitigation Framework Measure HAZ-2 from the OMCP FEIR. Impacts would be less than significant after mitigation and no new impact would occur.

Visual Effects and Neighborhood Character

FEIR

As discussed in the OMCP FEIR, no scenic roadways, scenic vistas, or scenic viewing areas were identified within the OMCP area, or within the General Plan. Visual resources in the OMCP area include open mesas and canyons. Existing public view points include roadways, schools, and parks in the community. The OMCP FEIR discusses public viewing areas that exist in the OMCP area, but are not designated view areas. One such area is the view of the mesas to the south from San Ysidro High School, which would be replaced with the Southwest District (the proposed Project is located within the area identified as the Southwest District). The change of views from the locations identified in the OMCP FEIR were identified as less than significant as the majority of existing views of canyons and mesas would be preserved under the OMCP. The OMCP FEIR identifies public views, including view corridors and gateway views that are designated in the OMCP; a gateway view is identified at the intersection of Caliente Avenue and Airway Road, but none are located on the project site. The OMCP polices and project design features to implement view corridors and gateways ensure that impacts associated with view blockage would be less than significant.

The OMCP FEIR identifies less than significant impacts associated with changes to the visual character of the OMCP area. The Southwest District (in which the proposed Project is located) is identified in the OMCP FEIR as mostly undeveloped mesas with non-native grasslands that would be converted to urban uses, resulting in a change of character. The land use and development design guidelines and policies of the OMCP would ensure that development would not result in development that would negatively affect the visual quality of the area. Additionally, future development would be required to comply with relevant land use and development design guidelines and policies of the General Plan.

The OMCP FEIR identifies less than significant impacts associated with landform alteration and unique physical features at a program level, due to future project's compliance with landform grading guidelines contained in the City Grading Regulation, ESL Regulations, and Steep Hillside Guidelines of the Land Development Code.

PROPOSED PROJECT

The portion of the Project site proposed for development is primarily flat (with elevations ranging from 505 to 529 feet MSL) and is undeveloped. A tributary finger canyon to Spring Canyon is present in the northeastern portion of the site. The western portion of the site proposed for development, consisting of approximately 8.3 acres, would be developed with the proposed multi-family dwelling units. The eastern portion of the site, consisting of approximately 12.9 acres, would contain the ROW for the future extension of Airway Road and the undeveloped MHPA/Open Space encompassing the Project mitigation lands.

The proposed Project is consistent with the Medium Residential land use designation for the site identified in the OMCP FEIR. The project proposes deviations to the development regulations,

including perimeter setbacks to the subdivision boundary and retaining wall heights. The deviations to perimeter setbacks include a deviation from the required 20-foot front setback to a proposed 15-foot setback, and a deviation from required 94- and 68-foot side yard setbacks to a proposed 10-foot side yard setback. The retaining wall height deviation is from the regulation maximum 6-foot wall height to a proposed 8-foot wall height.

The Project site would be developed consistent with most of the City development regulations for the proposed zone, and would be landscaped in accordance with a City-approved landscaping plan. The design utilizes a low water use planting pallet on all developed open space. Native or drought tolerant plants have been used for all shrub areas, and landscape would be maintained by the HOA. Mechanical equipment within landscaped areas would be screened by plant materials and/or screenwalls, where appropriate. Screening would also be provided for all utilities, including transformers and telephone boxes. Plantable retaining walls would be constructed along the northern boundary of the northern subdivision, adjacent to SR-905, and also along the southern boundary of the northern subdivision, adjacent to Airway Road.

The wall along the northern boundary of the northern subdivision would be 45 feet in length, with a minimum height of 0.5 feet to a maximum height of 7.2 feet. Two walls would be placed along the southern boundary of the northern subdivision. One wall would be 290 feet in length, with a minimum height of 1 foot and a maximum height of 5 feet. A second wall would be located slightly north of the first wall and would be 185 feet in length, with a minimum height of 0.5 feet and a maximum height of 3.3 feet. The Project includes an 8-foot high 306-foot long barrier along the north top of slope facing SR-905 in the northerly subdivision, from the northwest site boundary corner around the east end. This barrier would require a deviation and not meet the City's CEQA Significance Thresholds for Visual Effects /Neighborhood Character (Significance Threshold 4c), as it would be greater than 50 feet in length and 6 feet in height; however, Significance Threshold 4c also indicates that walls exceeding the length and height requirements would be significant if they included minimal landscape screening or berming where the walls would be visible to the public. The proposed barrier would be landscaped on both sides of the barrier, which would serve to screen the wall and break up the visual monotony. The side of the barrier facing the open space portion of the Project would include landscaping consistent with the requirements of transitional slope areas, consisting of shrubs four to eight feet in height. The side of the barrier facing the residential areas would include landscaping including groundcover and 24-inch box trees. The wall along the northern boundary of the northern subdivision and the two walls along the southern boundary of the northerly subdivision would be landscaped to help minimize their visual impacts. In the southern subdivision, the southern, eastern, and northern boundaries of the subdivision would consist of landscaped buffers consistent with City requirements. The Project proposes buildings with a maximum height of 35 feet, consistent with the RM-2-6 development regulations. The Project would not obstruct designated view corridors or scenic views, as none exist in the Project area.

The Project would comply with City development regulations and would implement all applicable design guidelines for landscaping, color, materials, and architectural treatments. As the Project is consistent with the land use designated for the site in the OMCP FEIR, and would be consistent with City requirements (if proposed deviations are approved), the Project would not result in significant visual impacts or impacts to neighborhood character. No new impacts beyond those analyzed in the FEIR would result.

Air Quality

FEIR

Based on the OMCP FEIR, development associated with the OMCP would result in approximately 1,045,025 vehicle trips per day, which is a reduction compared to the previously adopted version of the Community Plan. Although area and mobile emissions under the OMCP would exceed project-level thresholds, the emissions would be reduced as compared to the previously adopted Community Plan and would result in less than significant impacts associated with the obstruction of an applicable air quality plan. Construction and operational emissions associated with individual projects within OMCP area could not be quantified due to the program-level nature of the OMCP FEIR; thus, impacts were identified as significant. The OMCP FEIR presented Mitigation Framework Measures AQ-1 and AQ-2 to reduce project-level impacts associated with construction and operational emissions impacts. These measures require the incorporation of best available control technology to projects that exceed daily construction emissions thresholds and the requirement that development that would result in significant air quality impacts should receive entitlements only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset impacts. Even with implementation of mitigation framework, the OMCP FEIR identifies significant and unavoidable air quality impacts associated with construction and operational emissions. The OMCP FEIR also identifies potentially significant air quality impacts associated with stationary sources and collocation (the placement of residential, commercial, and industrial uses in proximity to one another). OMCP FEIR Mitigation Framework Measures AQ-3 and AQ-4 require an emissions inventory and health risk assessment for new facilities that would have the potential to emit toxic air contaminants, and a health risk assessment for certain types of projects or projects at closer than recommended buffer distances. As the OMCP FEIR is a program-level document, project-level impacts could not be determined, even with implementation of mitigation and impacts remained significant and unavoidable. The OMCP FEIR identified odor impacts as less than significant.

PROPOSED PROJECT

The Project is consistent with the land use designation for the site contained in the OMCP and therefore, would not be expected to conflict with or obstruct an applicable air quality plan. Proposed residential density would be within the range allowed under the Medium Residential designation and RM-2-6 zone proposed by the project. As identified in the City's CEQA Significance Determination Thresholds, projects that would typically result in significant air quality impacts would produce 9,500 Average Daily Trips (ADT) or greater. As discussed in the Transportation section of this Addendum, the Project is expected to generate 688 ADT, based on the Trip Generation Memorandum prepared for the Project by Kimley-Horn (2015). The estimated 688 ADT is far below the 9,500 ADT threshold that would typically result in a significant air quality impact. As such, the Project is not expected to result in significant operational air quality impacts or conflict with or obstruct an applicable air quality plan.

Construction emissions would be generated from the use of construction equipment at the site; construction-related traffic trips from workers, delivery trucks, and soil hauling trucks; and grading activities. Construction emissions would be temporary and short-term. Construction-related traffic trips would be far below the 9,500 ADT discussed above for a significant air quality impact, and thus, construction-related traffic would not violate an air quality standard or contribute to an existing or projected air quality violation. The City's CEQA Significance Thresholds identify 100 pounds per day

of PM_{10} (particulate matter 10 microns in diameter or less) as a screening threshold for fugitive dust impacts. The South Coast Air Quality Management District's *CEQA Air Quality Handbook* (1993) estimates that site grading generates 26.4 pounds PM_{10} per graded acre. Approximately 8.3 acres of the 21-acre site would be graded. If the entire developable portion of the Project site was graded in one day, it would be expected to result in approximately 216 pounds of PM_{10}, resulting in an exceedance of the 100 pounds PM_{10} screening threshold; however, the entire Project site would not be graded in one day, mass grading would be conducted in one phase over a period of several weeks. Additionally, as discussed in the City's CEQA Significance Thresholds, daily watering at the site prior to/during grading activities would reduce dust emissions by 50 percent. A second daily watering would reduce dust emissions by 75 percent. The Project would implement Best Management Practices for construction activities, including daily watering at the site prior to/during construction activities. Assuming a worst-case scenario, even if the entire 8.3 acres were graded in one day (which is not proposed), with implementation of twice daily watering, the fugitive dust emissions would be below the 100 pounds per day threshold (a 75% reduction of 216 pounds would be approximately 54 pounds of PM_{10}). Based on this information and the expected operational emissions associated with vehicle trips, the Project would not violate an air quality standard or contribute to an existing or projected air quality violation.

The Project would result in temporary emissions of fugitive dust and other pollutants during Project construction and long-term emissions during Project operation associated with traffic trips; however, as discussed above, these emissions would be below screening thresholds and would not result in a cumulatively considerable increase of criteria pollutants.

The Project is a residential development, which is not typically associated with odor-generating uses. As such, the Project does not have the potential to release objectionable odors.

As described above, the Project would not result in new significant impacts (construction and/or operational) through Project implementation. Therefore, no mitigation measures are necessary.

Biological Resources

FEIR

The OMCP FEIR identified potentially significant impacts to sensitive plants and animals through the implementation of the OMCP, directly through the loss of habitat and indirectly by placing development adjacent to the MHPA. Mitigation Framework (Measure BIO-1), which requires site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines, is provided to minimize impacts to sensitive biological resources. Although implementation of the OMCP has potential to result in significant direct and indirect impacts to sensitive plant and animal species, which can be mitigated at the project level, specific projects would be required to implement the Mitigation Framework identified in the FEIR, requiring site-specific environmental review, analysis of potential impacts to biological resources, and recommendations for project-specific mitigation to reduce significant project-level biological resource impacts to below a level of significance.

The OMCP FEIR identifies potentially significant direct and indirect impacts from future development, which has the potential interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, and habitat loss and/or

fragmentation. Mitigation Framework Measure BIO-2, which requires mitigation to be identified in site-specific biological resources surveys (which would occur as part of Mitigation Framework Measure BIO-1) prepared for future projects and incorporated into project-level construction documents, would reduce impacts at the program–level to less than significant.

Significant impacts to sensitive habitats (Tier I, II, IIIA, and IIIB) are identified in the OMCP FEIR. Sensitive habitats impacted as a result of OMCP implementation included maritime succulent scrub, native grassland, Diegan coastal sage scrub, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. These impacts would be reduced on a program-level to less than significant through compliance with OMCP policies and established development standards and regulations, along with implementation of Mitigation Framework Measure BIO-3 (which refers the reader to Measure BIO-1).

Future development implemented in accordance with the OMCP may propose an adjustment to the MHPA boundary; however, given that boundary adjustments require equal or better biological values and must meet MHPA boundary line equivalency criteria and obtain approval from the Wildlife Agencies, boundary adjustments would be considered less than significant. Potential indirect impacts would be evaluated at the project level for consistency with the MHPA Land Use Adjacency Guidelines, resulting in a program-level less than significant impact. The OMCP FEIR includes Mitigation Framework Measure LU-2, which provides a mitigation framework for addressing MHPA adjacency impacts at the project level. The OMCP FEIR identifies no significant impact relating to MSCP consistency.

Similar to other biological impacts, the OMCP FEIR states that the potential impacts associated with the introduction of invasive species into the MHPA would be evaluated at the project level. Future projects would be required to implement the MHPA Land Use Adjacency Guidelines and Mitigation Framework Measure LU-2 in the FEIR's Land Use section, which requires that the project's landscape plan not contain exotic/invasive species and would include an appropriate mix of native species which would be used adjacent to the MHPA. Impacts would be less than significant at the program level.

Impacts to wetlands, vernal pools, and other jurisdictional water resources were identified in the OMCP FEIR as significant. Compliance with OMCP policies and established development standards, ESL Regulations as well as the MSCP Subarea Plan, the City's Biology Guidelines, and implementation of the Mitigation Framework Measure BIO-4 would serve to reduce impacts to wetlands, vernal pools, and other jurisdictional water resources at the program level to below a level of significance.

The OMCP FEIR identifies potentially significant, temporary noise impacts to wildlife from construction and potentially significant permanent noise impacts from the introduction of noise-generating uses adjacent to the MHPA. Mitigation for impacts to sensitive wildlife species resulting from future projects are included in both the Biological Resources and Land Use sections of the FEIR, and include Mitigation Framework Measures BIO-1 through BIO-4 and LU-2 (MHPA Land Use Adjacency Guidelines). At the program level, the OMCP FEIR identified less than significant indirect noise impacts to sensitive wildlife species through compliance with the General Plan and OMCP policies, ESL Regulations, MHPA Land Use Adjacency Guidelines, the City's Biology Guidelines, and the identified FEIR Mitigation Framework.

PROPOSED PROJECT

A site-specific Biological Technical Report was prepared for the Project by Alden Environmental (September 2016), as required by OMCP Mitigation Framework Measure BIO-1. A full range of biological field surveys were conducted in 2014 and 2015 for the Project. In all, eight types of field surveys were conducted: vernal pool mapping, coastal California gnatcatcher survey, burrowing owl survey, vegetation mapping, jurisdictional delineation, dry season fairy shrimp survey, sensitive plant survey, and quino checkerspot butterfly survey. During the surveys, incidental plant and animal observations were noted. During the sensitive plant survey, special attention was given to MSCP Narrow Endemic species potentially occurring on site. Refer to the Biological Technical Report for additional details on survey dates, types, and survey methods. The analysis presented herein addresses the impacts associated with implementing the Southview East subdivision; impacts associated with the future extension of Airway Road are contained in the Project's Biological Technical Report.

Vegetation Communities

Eight vegetation communities occur on the Project site, consisting of three wetland/riparian, three upland, and two other communities. The Project site supports five sensitive vegetation communities: vernal pool, southern willow scrub, freshwater marsh, maritime succulent scrub, and non-native grassland. Road pools are not generally considered a sensitive community (City 2012); however, they are sensitive on the Project site because they support San Diego fairy shrimp. Approximately 8.3 total acres of vegetation would be impacted by the proposed Project. All Zone 1 and Zone 2 brush management for the Project would occur within the development footprint for the proposed subdivisions. There would be no direct impacts to wetland/riparian or Tier I upland vegetation communities from the Project. Table 3 identifies the Project's vegetation impacts. Project-level impacts to sensitive vegetation communities (i.e., non-native grassland) would require mitigation.

Table 3 – Direct Impacts to Vegetation Communities (acres)

Vegetation Communities	Total Acreage on site	Total Impacts
Wetland/Riparian		
Vernal pool	0.02	--
Road pool	0.06	--
Freshwater marsh	0.08	--
Southern willow scrub	0.04	--
Upland Habitat		
Maritime succulent scrub (Tier 1)	1.0	--
Non-native grassland (Tier IIIB)	17.3	6.9
Other Upland Habitat		
Disturbed Habitat (Tier IV)	1.5	0.3
Developed	1.1	1.1
TOTAL	**21.1**	**8.3**

Source: Alden Environmental (2016)

[1] Irrevocable Offer to Dedicate (IOD)

Sensitive Plant Species
Six sensitive plant species were observed on site: ashy spike-moss, San Diego bur-sage, Palmer's grapplinghook, San Diego barrel cactus, San Diego County viguiera, and seaside calandrinia. The Project would not result in direct impacts to sensitive plant species. No project-specific mitigation would be required.

Sensitive Animal Species
Eight sensitive animal species were observed or detected on site: San Diego fairy shrimp, Riverside fairy shrimp, northern harrier, San Diego black-tailed jackrabbit, coastal California gnatcatcher, Southern California rufous-crowned sparrow, white-tailed kite, and northwestern San Diego pocket mouse. There would be no direct impacts to Riverside fairy shrimp from the Project since the vernal pool habitat of this species would not be directly impacted. No direct impacts to coastal California gnatcatcher would occur; however, direct impacts to southern California rufous-crowned sparrow, San Diego black-tailed jackrabbit, raptor foraging habitat, and nesting birds would be significant. Project-specific mitigation would be required.

There is moderate potential for the burrowing owl and California horned lark to occur on site in grassland habitat to be impacted by the Project. The burrowing owl is a State Species of Special Concern, but it is also an MSCP Covered Species with special conditions for its coverage prescribed in Appendix A of the City's Subarea Plan. The California horned lark is a State Species of Special Concern; it is not an MSCP Covered Species. Conditions for Coverage under the MSCP for the burrowing owl require that during the environmental analysis of proposed projects, burrowing owl surveys (using appropriate protocols) be conducted in suitable habitat to determine if this species is present and the location of active burrows. Burrowing owl surveys were conducted on site as recently as 2014. While the burrowing owl was not found, the Project site has potential to be occupied by burrowing owl, resulting in a potentially significant impact. Therefore, mitigation that includes additional surveys and, if necessary, impact avoidance is required. Additionally, clearing of vegetation or construction activities could cause destruction or abandonment of active burrowing owl burrows or California horned lark nests or mortality of adults, young, or eggs should these species be present. These direct impacts would also be considered significant, consistent with the OMCP FEIR. Project-specific mitigation would be required; the mitigation measures are listed in the MMRP, Section V of this document.

Waters of the U.S., Waters of the State, and City Wetlands

Waters of the U.S. U.S. Army Corps of Engineers (Corps) jurisdictional freshwater marsh occurs on approximately 0.04 acre of the Project site, while southern willow scrub occurs on approximately 0.01 acre of the site. These wetlands occur in the bottom the canyon and are completely avoided by the Project. Non-wetland Waters of the U.S. occur in the unvegetated portion of the drainage in the northern portion of the site. The drainage show signs of occasional water passing through (bed and bank) and is, therefore, characterized as a drainage, covering approximately 0.02 acre. In total, the non-wetland Waters of the U.S. drainage is approximately 383 feet in length and varies from one to two feet in width.

Waters of the State. CDFW jurisdictional wetlands on site include 0.04 acre of southern willow scrub and 0.08 acre of freshwater marsh. In total, 0.12 acre of CDFW jurisdictional wetlands occurs on site.

Approximately 0.02 acre of unvegetated streambed occurs on site that is also under CDFW jurisdiction as non-wetland Waters of the State.

City Wetlands. City Wetlands on site include 0.08 acre of freshwater marsh and 0.04 acre of southern willow scrub. This is the same area as that considered to be jurisdictional wetland by the Corps and CDFW.

The Project would not result in direct impacts to Waters of the U.S., Waters of the State, or City Wetlands. No new impact would occur under the Project.

Wildlife Corridors
The MHPA includes core biological resource areas and corridors targeted for conservation that preserve local and regional corridor functions. The easternmost portion of the site is within the MHPA. The MHPA in this portion of Otay Mesa is at the upper end of a canyon that is a tributary to Spring Canyon and represents the northwestern edge of the MHPA south of SR-905. The Project would not substantially impact the MHPA on site, and would, therefore, not significantly alter wildlife movements. Impacts would be less than significant. No new impact would occur under the proposed Project.

MSCP Evaluation
As discussed under *Land Use*, the potential exists for indirect effects to resources in the MHPA and Project-specific mitigation measures are provided to reduce impacts associated Project inconsistencies with MSCP Subarea Plan policies, including Construction and Maintenance policies; Fencing, Lighting, and Signage policies; Materials Storage; and General Management Directives. Refer to discussion in the Land Use section of this Addendum. As discussed in the Land Use section, inconsistencies with MSCP Subarea Plan policies would result in a potentially significant impact which would require mitigation. The Project-specific mitigation measures are listed in the MMRP, Section V of this document.

Historical Resources

FEIR
According to the OMCP FEIR, there are 262 historic and prehistoric sites/structures recorded within the OMCP planning area boundaries. Of these 262 recorded sites, 136 have been partially or completely developed, with 83 of the 136 sites completely destroyed and 53 of the 136 sites being impacted to some extent. The remaining 126 of the 262 recorded sites have not been impacted by development. The OMCP FEIR identifies potentially significant program-level impact associated with future development within the OMCP area, due to the number and density of prehistoric and historical resources in the OMCP area. The OMCP FEIR Mitigation Framework Measures HIST-1 and HIST-2 establishes mitigation for historical archaeological resources and historic buildings, structures, and objects impacts. Compliance with these measures reduces the program-level impact to below a level of significance.

PROPOSED PROJECT
As discussed in *Land Use*, the Project's Archeological Survey and Evaluation Report did not identify new significant impacts that were not already anticipated in the OMCP FEIR. Thus, no new impacts to historical resources would occur as a result of the Project. The Project would be required to

implement monitoring during grading activities, consistent with standard City of San Diego requirements. A Native American monitor would be required to be present during grading and trenching. These Project-specific mitigation measures are listed in the MMRP, Section V of this document. The OMCP FEIR includes Mitigation Framework Measure LU-1b, which requires the Project to be subject to discretionary review.

Human Health/Public Safety/Hazardous Materials

FEIR

The OMCP FEIR identifies potentially significant impacts related to wildfire and aircraft hazards. Regarding wildfire hazards, General Plan and OMCP goals and policies, as well as continued monitoring and updating of existing development regulations and plans to create defensible spaces, reduce the risk of wildland fires and impacts from wildland fires. Future development under the OMCP would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code; however, because existing and proposed land use patterns associated with the OMCP, new development in wildland interface areas expose additional people and structures to wildland fire hazards, resulting in a potentially significant impact. OMCP FEIR Mitigation Framework Measure HAZ-1, which requires future projects to be implemented in accordance with a number of standards and policies, reduce impacts of wildland fire hazards to a less than significant level.

Brown Field Municipal Airport is located within the OMCP area. Implementation of General Plan and OMCP policies that address land use compatibility would support the development of future uses consistent with the Brown Field Municipal Airport Land Use Compatibility Plan. Additionally, future projects would be submitted to the Airport Land Use Commission for a consistency determination. However, the OMCP FEIR identifies potentially significant aircraft hazard impacts due to potential conflict of future projects with FAA requirements.

With implementation of policies contained in the General Plan, OMCP, and regulations imposed by federal, state, and local agencies, the OMCP FEIR identifies less than significant impacts related to the future risk of an explosion or the release of hazardous substances. While the OMCP proposes new uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations that would allow for the use, generation, transport, and/or temporary storage of hazardous materials, implementation of policies contained in the General Plan, OMCP, and regulations imposed by federal, state, and local agencies would reduce impacts to below a level of significance. No mitigation is required.

The OMCP FEIR identifies 23 sites of potential environmental concern within the OMCP area, with six sites that were determined to pose a potentially significant hazard to future development. Additionally, the potential for unknown hazardous materials to be present in the OMCP area is identified as a potentially significant hazard to the public or the environment. Impacts associated with hazardous materials site is identified as a potentially significant impact. While OMCP policies are designed to reduce the risk of health and safety hazards from hazardous sites, mitigation is required. Mitigation Framework Measure HAZ-3 requires future projects implemented in accordance with the OMCP to demonstrate further regulatory oversight and demonstrate compliance prior to the issuance of any ministerial permit. The Mitigation Framework includes measures to complete a Phase I Site Assessment, and follow up measures to address potential

soil/groundwater contamination. Implementation of Mitigation Framework Measure HAZ-3 coupled with implementation of General Plan and OMCP policies, and regulations imposed by federal, state, and local agencies would reduce impacts to a less than significant level.

PROPOSED PROJECT

The eastern portion of the Project site would remain undeveloped as MHPA/open space. The Project is required to implement brush management zones to reduce risk from wildland fires. The Project would include brush management zones, as required; however, the Project is using alternative compliance for Brush Management Zone 2. Alternative compliance for Brush Management Zone 2 would reduce the Brush Management Zone from the standard 65 feet to widths varying from 28 to 56 feet. The requested alternative compliance is intended to reduce impact to sensitive habitat and biological setbacks. The Project would be developed consistent with City design and landscaping requirements, and would also be subject to review and approval of the City's Fire Department. The Project would implement Mitigation Framework Measure HAZ-1 from the OMCP FEIR and impacts would be less than significant. No new impact would occur.

The Project site is located within Review Area 2 of the Brown Field Municipal Airport Influence Area (AIA). Review Area 2 consists of areas within airspace protection and/or overflight notification areas. Limits on heights of structures are the only restrictions on land uses within Review Area 2. The recordation of overflight notification documents is also required within Review Area 2. Additionally, due to the Project's proximity to Brown Field Municipal Airport, future residents and owners of the proposed residences would be required to sign disclosures recognizing the presence of an airport nearby and that the property would be subject to aircraft overflights and noise at all hours, day and night, 365 days per year. The Project would also require FAA Part 77 Notification during the building permit phase. The Project would be required to comply with the structure height restrictions for Review Area 2, resident/owner disclosures, and FAA notification, and would also comply with Mitigation Framework Measure HAZ-2 from the OMCP FEIR. Impacts would be less than significant after mitigation and no new impact would occur.

The Project would consist of residential uses, which would not involve the routine transport, use, or disposal of hazardous materials. During construction activities, small amounts of hazardous materials may be present on site (such as fuels, lubricants, solvents, etc.); however, these materials would be present in small quantities and typical of those used in construction activities. These materials would be stored, handled, used, and disposed of in accordance with applicable federal, state, and local regulations and requirements, and would not create a significant hazard to the public or environment. Impacts would be less than significant and no new impact would occur.

The Project site was not identified as a site containing hazardous materials in the Geotracker database. Additionally, the Project did not require the preparation of a Phase I Environmental Site Assessment. Of the 23 sites of potential environmental concern identified in the OMCP FEIR, two are located in close proximity to the Project site: the Otay Mesa Widening Project and the Dillons Trail Site. During the Otay Mesa Widening Project, located adjacent to the north and south of Otay Mesa Road, petroleum hydrocarbon and pesticide impacted soil was identified in a 1996 site assessment adjacent to Otay Mesa Road. During construction of that Project, no detectable concentrations were found. The Project site is located approximately 0.2 mile south of Otay Mesa Road, and is separated from the site by SR-905. The site associated with the Otay Mesa Widening Project is not expected to impact or affect the Project site. The Dillons Trail Site is located southwest

of the southern termination of Caliente Avenue, approximately 0.3 mile from the Project site. Illegal disposal activities have occurred at this site; however, due to its distance from the Project site, it is not expected to impact the Project. Impacts associated with sites of environmental concern would be less than significant and no new impact would occur.

In summary, while there is the potential for health and public safety impacts through implementation of the Project, these impacts would be consistent with the OMCP FEIR, which identified mitigation measures. Therefore, no new impacts would occur as a result of the Project.

Hydrology/Water Quality

FEIR

The OMCP FEIR identifies potentially significant impacts associated with an increase in impervious surfaces within the OMCP area as a result of future development under the OMCP. An increase in the amount of impervious surfaces could increase the amount and rate of runoff and result in alterations of drainage patterns in the OMCP area. Mitigation Framework Measure HYD/WQ-1 requires future projects to demonstrate compliance with local and state regulatory requirements satisfactory to the City Engineer. Implementation of the Mitigation Framework, coupled with compliance with General Plan and OMCP policies for reducing stormwater runoff, reduces impacts to a less than significant level.

Most of the OMCP area drains to the south across the border with Mexico and eventually into the Tijuana River; however, the far western part of the OMCP area flows to the west through San Ysidro and then into the Tijuana River. A small portion flows north into the Otay River, which ultimately discharges into the San Diego Bay. The buildout of the OMCP would result in modifications to the natural drainage system. As such, the OMCP FEIR identifies modification of the natural drainage system as a potentially significant impact. The FEIR indicates that future projects implemented in accordance with the OMCP would require hydromodification management considerations and would be required to prepare project-level drainage studies to address and ensure compliance with Storm Water Regulations. Implementation of Mitigation Framework Measure HYD/WQ-1 (discussed above) would reduce impacts to a less than significant level.

Portions of the OMCP area (in the northwestern portion) are located in the Federal Emergency Management Agency (FEMA) 100-year floodplain. The Otay Mesa Creek flows from north to south along La Media Road and crosses the border into Mexico and is subject to flooding, even though it is not within the 100-year floodplain. The OMCP FEIR identifies potentially significant impacts associated with future development along the floodplain and indicates that all future projects would be required to be designed satisfactory to the City Engineer to contain 100-year flow and reduce or eliminate flooding impacts to adjacent properties. However, due to the lack of project-level detail for the program-level FEIR, impacts are potentially significant. Implementation of Mitigation Framework Measure HYD/WQ-1 (discussed above) would reduce impacts on a program-level to less than significant.

The OMCP FEIR identifies potentially significant impacts associated with water quality. While each Project developed as part of the OMCP buildout would be required to comply with federal, state, and local regulations, which would reduce significant impacts to a degree, compliance with these regulations would not ensure that future project-level impacts would be avoided or reduced below a

level of significance. Impacts are identified as potentially significant. Mitigation Framework Measure HYD/WQ-2 provides general measures that shall be implemented to preclude water quality impacts, but the FEIR indicates that these measures shall be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions, as well as changes to local, state, and federal laws. Future development implemented in accordance with the OMCP would be subject to the requirements of the Storm Water Standards which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework detailed in Measure HYD/WQ-2, which requires regulatory compliance as noted above would ensure that the General Plan and OMCP polices for reducing storm water run-off and potential impacts related to discharges into surface or ground water, alterations to surface or groundwater, increases in pollutant discharges (erosion) and downstream sedimentation would be reduced to below a level of significance.

PROPOSED PROJECT

A Stormwater Quality Management Plan (SWQMP; SB&O, Inc., August 11, 2016) and a Detention Basin Design Report (SB&O, Inc., May 6, 2016) were prepared for the Project, in accordance with Mitigation Framework Measure HYD/WQ-1. The following discussion is based on these Project-specific reports.

The Project is located in the Otay Mesa community, which is tributary to the Tijuana River Valley. Development of the proposed Project would result in the installation of impervious surfaces on the currently undeveloped site. New impervious surfaces would be constructed on the Project site, including the area proposed for future development of Airway Road. Currently, runoff from the northeastern portion of the Project site generally drains southeast into Spring Canyon. The southeastern portion of the Project site drains generally easterly to a finger canyon. The Project proposes to use biofiltration basins for treatment, followed by detention facilities for combined Hydro-Modification Plan (HMP) control and storm attenuation (the detention facility north of Airway Road would consistent of a detention basin, while the detention facility south of Airway Road would consist of an underground storage facility). The Project would be developed in conjunction with the adjacent Southview–West Project (i.e., Tesoro and Vista del Sur developments). The proposed Project would include the replacement of the two existing combination (water quality treatment, HMP controls and detention) basins that are part of the adjacent Tesoro and Vista del Sur developments. The Project would expand the combination basins to include these offsite areas. The northern portion of the Project would accept runoff from portions of Caliente Avenue and Airway Road and from the adjacent Tesoro Project. The southern portion of the Project would accept runoff from the adjacent Vista del Sur Project. The Project would continue the general west to east drainage trend. There are no storm drain systems downstream of the site for connection. Discharge points are located near the existing Airway Road terminus (i.e., cul-de-sac) and at the southeast corner of the development envelop. Private storm drain systems would convey Project runoff, along with runoff from the adjacent Tesoro and Vista del Sur Projects, to the two biofiltration basins, through the detention facilities and the storm drain outfalls. Additional public storm drain inlets for Airway Road would also be routed to the basins. With implementation of the measures described above, the Project would not result in significant impacts related to new impervious surfaces or alteration of drainages. The Project's impacts would be consistent with those identified in the OMCP FEIR and no new impact would occur.

The Project site in not located in a FEMA 100-year flood zone, nor is it located adjacent to Otay Mesa Creek. As discussed above, the Project includes an expansion to the existing combination biofiltration basins which would serve the proposed Project, as well as the adjacent Tesoro and Vista del Sur Projects. The biofiltration basins have been adequately designed to attenuate post-development peak flow rates for the 2-, 5-, 10-, 25-, 50-, and 100-year storm events. Although the drainage pattern of the Project site would be modified, no flooding on or off site would occur as a result of drainage pattern modifications. The Project's impacts would be consistent with those identified in the OMCP FEIR and no new impact would occur.

The SWQMP identified the Project as a Priority category. Potential pollutant sources identified for the Project include on-site storm drain inlets, landscaping and outdoor pesticide use, refuse areas, and plazas, sidewalks, and parking lots. As discussed above, the Project proposes to use biofiltration basins for treatment, followed by detention facilities for combined HMP control and storm attenuation. Additionally, the Project would be required to comply with all storm water quality standards (including the City of San Diego's Storm Water Standards and stormwater construction requirements of the State Construction General Permit, Order 2009-009-DWQ) during and after construction and appropriate Best Management Practices would be implemented. Based on these considerations, the Project would not violate water quality standards or waste discharge requirements. The Project's impacts would be consistent with those identified in the OMCP FEIR and no new impact would occur.

Geology/Soils

FEIR

The OMCP FEIR identifies the western and southern edges of the OMCP area as moderate to high geotechnical and relative risk areas, which includes a complex of deep-seated landslides and several discontinuous faults (the Project site is not located within these portions of the OMCP area). The OMCP FEIR indicates the groundwater, tsunamis, seiches, and subsidence were found not to pose substantial geological constraints to future development. Potentially significant impacts associated with the San Ysidro landslide, steep hillside landslides, faults, compressible soils, expansive soils, and erosion are identified in the OMCP FEIR. These potentially significant impacts would be mitigated through implementation of OMCP FEIR Mitigation Framework Measures GEO-1 and GEO-2. Measure GEO-1 requires 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. GEO-2 requires adherence to the City's grading regulation and NPDES permit requirements, as well as California Building Code. Implementation of the General Plan and OMCP policies, compliance with established development and engineering standards, as well as strict adherence to the Mitigation Framework detailed in Measures GEO-1 and GEO-2 would reduce geological and erosion hazards associated with implementation of the OMCP to below a level of significance.

PROPOSED PROJECT

Geocon Incorporated prepared a geotechnical investigation for the Project (May 2014) as well as an Addendum to the geotechnical investigation (December 15, 2014, revised April 8, 2015), in accordance with Mitigation Framework Measure GEO-1. Based on the geotechnical investigation, Very Old Paralic Deposits underlie the surficial units of undocumented fill and topsoil. San Diego

Formation is expected to under the Very Old Paralic Deposits at an elevation of approximately 475 feet MSL. Undocumented fill exists along the southern and southeastern property lines as an earthen berm. Additional undocumented fill may exist in the northeast central portion of the property in the vicinity of the existing canyon drainage. The undocumented fill is not suitable for support of structural loading, fill, and/or surface improvements in its present condition. A blanket of disturbed topsoil covers the entire Project site, with an estimated thickness of approximately 1 to 5 feet, with Very Old Paralic Deposits underneath the topsoil. San Diego Formation exists below the Very Old Paralic Deposits.

The Project site is designated as Category 53: *Level or sloping terrain, unfavorable geologic structure, and low to moderate risk* by the City of San Diego Seismic Safety Study Geologic Hazards and Faults. The following potential impacts associated with the proposed Project, as identified by the Project geotechnical investigation and addendum are summarized below.

- Ground rupture**.** No known active, potentially active, or inactive faults are located on the site. The potential for ground rupture is considered to be very low due to the absence of active faults at the Project site.
- Seismic ground shaking**.** The potentially active La Nacion Fault is located approximately 800 feet to the east of the Project site. The nearest known active fault is the Newport-Inglewood/Rose Canyon Fault system, located approximately 8 miles west of the Project site. The Project would be subject to ground shaking from seismic activity from nearby and regional faults.
- Slope stability**.** Slope stability analysis was completed for the proposed Project fill slopes with inclinations as steep as 2:1 (horizontal to vertical) and indicated a calculated factor of safety of 1.5 under static conditions for deep-seated and surficial failure.
- Seiches and Tsunamis**.** The Project site is approximately 2 miles south of the Otay River and 250 feet above the river valley. The nearest upstream body of water is Lower Otay Lake, at a distance of approximately 6 miles to the northeast of the site. The Project site is identified as very low risk of being affected by a seiche. The Project site is at a distance of approximately 7 miles from the Pacific Ocean and at an elevation of approximately 520 feet above MSL, and thus, has a negligible risk of tsunami impacts.
- Liquefaction**.** The Project site has a very low potential for liquefaction due to the recommended remedial grading necessary for the Project, lack of near-surface permanent groundwater conditions, and the dense nature of the Very Old Paralic Deposits present on site.

In conclusion, the OMCP FEIR calls out significant and unavoidable impacts until such time that site-specific mitigation can be implemented. The geotechnical report prepared for the proposed Project provides these site-specific recommendations regarding site preparation (e.g. installation of shoring, excavation, and placement of backfill) in its conclusions and recommendations section (Section 7). Based on the Project-specific geotechnical investigation and its associated addendum, the geotechnical consultant concluded that there is no geotechnical related conditions at the Project site that would preclude development as presently proposed, provided that the recommendations within the report are implemented.

The City's Geology Section has reviewed the referenced report and concluded that the investigation conducted adequately addressed the geologic conditions potentially affecting the Project site.

Proper engineering design and utilization of standard construction practices, to be verified at the building permit stage, would ensure that the potential for impacts from regional geologic hazards would be less than significant and no mitigation measures are deemed necessary. Therefore, based on the results of the geotechnical investigation of the site, and provided that the earthwork and grading recommendations are implemented in accordance with the City Grading Ordinance requirements (as noted in Measure GEO-2), the Project's impacts would be consistent with those identified in the OMCP FEIR and no new impact would occur.

Energy Conservation

FEIR

The OMCP FEIR identifies less than significant impacts related to energy usage and indicates that OMCP implementation would not result in the use of excessive amounts of electricity or fuel in other forms. The OMCP FEIR indicates that implementation of the OMCP has the potential to result in impacts to energy supply due to the development that is anticipated to occur in response to projected population growth; however, impacts would need to be addressed in detail at the proposal of specific projects. Projects would be required to meet mandatory energy standards of the current California energy code (Title 24 Building Energy Standards). On a program level, implementation of the OMCP would not result in the use of excessive amounts of fuel or other energy, nor result in a need for new electrical systems or substantial alternations of existing utilities. Impacts are identified as less than significant on a program-level.

PROPOSED PROJECT

The Project would require energy usage during construction and during long-term operation. The Project would provide a 15 percent improvement in energy usage as compared to 2013 Title 24 standards. The Project would use recycled/sustainable materials for construction and operation to the extent feasible and construction and demolition debris would be recycled, as appropriate. The Project would comply with the goals of the City's Conservation Element. The Project would not result in the use of excessive amounts of fuel or other forms of energy during its construction and operation. The Project's impacts would be less than significant and consistent with those identified in the OMCP FEIR; no new impact would occur.

Noise

FEIR

The OMCP FEIR includes generalized mitigation measures for noise impacts which require site specific noise analyses for residential projects and interior acoustical analyses for noise sensitive land uses located in areas where the exterior noise levels exceeds the City General Plan noise compatibility standards (60 dBA [24-hour A-weighted average decibel level] community noise equivalent level [CNEL] or greater). The OMCP FEIR concludes that exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate-805, SR-905, SR-125, Otay Mesa Road, and Airway Road, but the significance of mitigation cannot be determined on a program-level basis. Mitigation Framework Measures NOI-1 and NOI-2, which require site-specific noise exterior and site-specific interior noise analyses for individual projects; however, impacts remain significant and unavoidable. The OMCP FEIR also identifies potentially significant impacts related to stationary noise sources and construction noise levels, both of which could exceed established standards. The OMCP FEIR identifies Mitigation Framework Measure NOI-3 for

these impacts that require a site-specific acoustical/noise analysis of on-site generated noise sources, and best construction management practices on a project-by-project basis. The OMCP FEIR concluded that at the plan level, the generalized noise mitigation measures for each of the identified potentially significant impacts would not sufficiently reduce noise impacts. The OMCP FEIR identifies less than significant impacts associated with airport noise. Impacts identified for construction noise are potentially significant and would need to be analyzed on a project-by-project basis. Mitigation Framework Measure NOI-4 identifies control measures to be implemented for projects exceeding daily construction noise thresholds. Impacts associated with construction noise remain significant and unavoidable. Thus, significant and unavoidable adverse impacts are anticipated until such time that mitigation measures can be implemented through a final MMRP at a project-specific level.

PROPOSED PROJECT

An exterior noise analysis for the Project was prepared by dBF Associates, Inc. (January 4, 2016), in accordance with Mitigation Framework Measure NOI-1. The Noise Element of the City of San Diego General Plan specifies that exterior noise levels at multi-family residential outdoor areas of frequent use (patios, balconies, parks, swimming pools, etc.) shall not exceed 65 dBA CNEL. Title 24 of the California Code of Regulations requires an acoustical analysis for multi-family residential uses located in areas that exceed 60 dBA CNEL that demonstrates that interior noise in habitable rooms does not exceed 45 dBA CNEL. Construction noise is limited to an hourly noise level of 60 dBA Leq (one hour, weighted equivalent sound level) in areas with suitable and occupied Diegan coastal sage scrub during the coastal California gnatcatcher breeding season of March 1 through August 15.

The Project includes an 8-foot high barrier along the north top of slope facing SR-905, from the northwest site boundary corner around the east end of the open area above the stormwater basin. The barrier would be made of solid construction such as masonry, wood, glass, Plexiglass (or similar materials with a mass of at least 3.5 pounds per square foot). Future exterior roadway traffic noise levels on the Project site, as designed with the 8-foot high Project noise barrier would range from below 50 dBA CNEL in the center of the southerly subdivision to approximately 65 dBA CNEL at the ground floor of the northeast corner of the northerly subdivision. Traffic noise levels at outdoor areas of frequent use would be 65 dBA CNEL or less. Traffic noise levels at Project outdoor usable space would comply with the City of San Diego traffic noise significance threshold of 65 dBA CNEL.

Because future exterior traffic noise levels would exceed 60 dBA CNEL at the Project building façades, interior noise levels in habitable rooms could exceed the California Code of Regulations, Title 24: Noise Insulation Standard and City of San Diego General Plan Noise Compatibility Guidelines requirement of 45 dBA CNEL, resulting in a potentially significant impact. To avoid a potential interior noise impact, mitigation requiring an interior noise analysis would be required to be approved by the City's Building Inspection Department upon application for a building permit. This Project-specific mitigation measure is listed in the MMRP, Section V of this document. The Project would result in a less than significant interior noise impact with Project features incorporated in accordance with the interior noise analysis. This noise analysis report would satisfy OMCP FEIR Mitigation Framework Measures NOI-1, NOI-3, and NOI-4. The interior noise analysis required as mitigation satisfy OMCP FEIR Mitigation Framework Measure NOI-2.

The operational noise level at property lines within 40 feet of HVAC units could exceed the nighttime noise limit of 45 dBA Leq at City of San Diego multifamily residential property lines. To avoid a potential noise impact at the property line, mitigation requiring placement of HVAC units at a

distance of over 40 feet from the property line, or use of HVAC units with a sound power level of 63 dBA Leq or below would reduce impacts to a less than significant level. This Project-specific mitigation measure is listed in the MMRP, Section V of this document. No new impact would occur.

Project-generated traffic noise level increases along Project roadway segments would be lower than the thresholds of significance for Project-generated traffic-related noise. The impact would be less than significant; no new impact would occur.

If residences are constructed and a certificate of occupancy has been granted on the properties adjacent to the Project on the west during a time when grading is occurring within 315 feet of the west Project property line, the construction noise level of 80 dBA Leq (12 hours) at the west Project property line would exceed the City of San Diego construction noise limit of 75 dBA Leq (12 hours). This is a potentially significant impact, requiring mitigation. Mitigation is listed in the MMRP, Section V of this document. With this noise mitigation, Project construction noise levels would comply with City of San Diego construction noise limits. No new impact would occur.

Paleontological Resources

FEIR

According to the OMCP FEIR, the Project site is underlain by areas of high (San Diego Formation) and moderate (Very Old Paralic Deposits) paleontological sensitivity. The San Diego Formation has rich fossil beds that have produced fossil marine mammals, sea birds, and mollusks, which are an important source of information on Pliocene marine organisms and environments. Fossil localities are rare in Very Old Paralic Deposits and have only been collected in a few areas. The OMCP FEIR found that significant impacts could result from implementation of the OMCP, but would be mitigated through a project-level analysis of paleontological impacts and paleontological monitoring requirements during grading (OMCP FEIR Mitigation Framework Measure PALEO-1).

PROPOSED PROJECT

According to the geotechnical investigation prepared for the Project (Geocon Incorporated, May 2014), the Project site is underlain by Very Old Paralic Deposits and San Diego Formation, which have moderate to high paleontological sensitivity, respectively. San Diego Formation is not expected to be encountered on the Project site during the proposed development, due to its depth and the current grading and construction plans. As such, the Project is expected to impact only the Very Old Paralic Deposits (moderate paleontological sensitivity). As discussed in the Project description, required cut associated with the Project is 1,516 cubic yards (cy), at a maximum depth of cut of 4.08 feet. Consistent with the City's CEQA Significance Determination Thresholds, if a Project excavates over 2,000 cy at a depth of ten feet or greater in moderate sensitivity areas, and excavates 1,000 cy at a depth of ten feet or greater in high sensitivity areas, the Project would result in a significant impact on paleontological resources. The proposed Project would require construction in an area of moderate sensitivity; however, the Project would not meet the City's Significance Thresholds for impacts to paleontological resources, therefore mitigation will not be required. As such, Project-specific impacts would be less than significant and no new significant impact would occur.

Transportation/Traffic Circulation

FEIR

The OMCP FEIR analyzed traffic impacts for the OMCP area based on a build-out of the plan. The OMCP FEIR concluded that there would be significant traffic impacts at 24 roadway segments, 49 intersections, five SR-905 freeway segments and five SR-905 freeway ramps. Program-level impacts are reduced through proposed classifications of roadways and identification of necessary roadway, intersection, and freeway improvements; however, mitigation or construction of identified improvements would occur at the project-level via the Public Facilities Financing Plan and future development projects. Mitigation Framework Measure TRF-1 requires intersections to be improved per intersection lane designations identified in Figures 5.12-4 a-g in the OMCP FEIR. Although Mitigation Framework measures in the OMCP FEIR reduces impacts at 10 of the 49 intersections to a less than significant level, the impacts to roadway 24 segments, 39 intersections, five SR-905 freeway segments, and five SR-905 freeway ramps remain significant and unmitigated, program-level impacts.

The OMCP FEIR identifies less than significant impacts associated with traffic hazards for motor vehicles, bicyclists, or pedestrians, as all roadway improvements would be designed and constructed in accordance with the OMCP Mobility Element roadway networks satisfactory to the City Engineer. The OMCP also contains policies that would reduce potential conflicts between vehicle, pedestrian, and bicyclists. Less-than-significant traffic impacts are also identified for circulation and access and alternative transportation. Buildout of the OMCP transportation network would result in increased circulation capacity and access for vehicles, bicycles, and pedestrians, and temporary closures or detours during street improvements for future projects would be addressed through traffic control plans in accordance with City policy. All OMCP policies and goals regarding alternative transportation are identified by the OMCP FEIR as consistent with existing General Plan policies.

PROPOSED PROJECT

A trip generation memorandum and a signal warrant analysis memorandum were prepared by for the Project by Kimley-Horn (April 19, 2016) to identify the Project trip generation as well as evaluate the need for a driveway signal at the Project access. The results of these two memorandums are summarized below in the context of the OMCP FEIR analysis.

Project Trip Generation

The Project would generate a total of approximately 688 ADT based on trip generation rates contained in the City of San Diego Trip Generation Manual (2003). Using the "Multiple Dwelling Unit – under 20 dwelling units per acre," each unit would generate 8 daily trips, with 55 (11 in, 44 out) expected in the AM (morning) peak hour and 69 (48 in, 21 out) expected within the PM (evening) peak hour. This volume of traffic, combined with the trips approved for the Southview West (i.e., Vista Del Sur) project immediately west of the Project, would be 414 less trips than approved under the prior Southview project (refer to the *Project Background* discussion above), and fewer trips than assumed under the OMCP. Therefore, the Project would be consistent with the overall traffic generation modeling for the OMCP buildout.

Roadway Segments

Of the 24 roadway segments expected to operate at unacceptable levels of service (LOS) at buildout of the OMCP, several are in the immediate Project vicinity, including: Airway Road from Caliente

Avenue to Heritage Road; Airway Road from Heritage Road to Cactus Road; Otay Mesa Road from Caliente Avenue to Corporate Center Drive; and Caliente Avenue from Airway Road to Beyer Boulevard. The Project is proposing an IOD for the eventual extension of Airway Road from its current terminus to the eastern property boundary, in accordance with its planned route and classification in the OMCP.

Intersections
Of the intersections projected to operate at unacceptable LOS during OMCP implementation, several are in the immediate Project vicinity including Caliente Avenue/SR-905 eastbound ramps, Caliente Avenue/SR-905 westbound ramps, Caliente Avenue/Airway Road, and Otay Mesa Road/Caliente Avenue. Project traffic would contribute to these intersection impacts, in particular those at Caliente Avenue/Airway Road since it's the primary route residents would take to access the Project entrance on Airway Road The OMCP FEIR demonstrated that signalization and implementation of improvements to the Caliente Avenue/Airway Road intersection would mitigate impacts of community buildout. Several development projects in the vicinity of the Southview East Project are conditioned to implement intersection improvements and the Project's applicant has bonded for the signal improvements as part of the Southview West Project. Thus, no Project-specific mitigation would be required.

Airway Road would provide access for the Vista del Sur development, as well as the Project. Although the location was not identified in the OMCP FEIR as one of the intersection locations where significant impacts would arise during community buildout, a signal warrant analysis was conducted by Kimley-Horn to determine when a signal at the Airway Road project access would be warranted. The signal analysis assumes that all vehicles utilizing the Project's access intersection on Airway Road would be generated by the two developments. Based on the signal warrant analysis, the traffic generated from the two developments (as reduced from levels assumed in the OMCP) would not meet the peak-hour signal warrant until Airway Road is extended and connected to the rest of the community's street network to the east.

As such, Project-specific impacts at roadway segments and intersections in the Project vicinity would be less than significant and not result in any new significant impacts; no additional impacts are anticipated to occur compared to the program-level analysis described in the OMCP FEIR.

Public Services

FEIR
Fire and Police Protection Services
Fire protection services within the OMCP area are provided by the City of San Diego Fire-Rescue Department (SDFD). The OMCP area is served by three fire stations, including Fire Station 43 (located on the eastern end of Brown Field), Fire Station 6 (located in the adjacent Otay Mesa-Nestor community planning area), and Fire Station 29 (located in the San Ysidro community planning area). Police Service are provided to the OMCP area by the Southern Division of the San Diego Police Department, located at 1120 27th Street. The OMCP FEIR identifies an increased need for police and fire protection services with the OMCP area, based on buildout of the OMCP. A future 10,000-square-foot collocated police/fire-rescue facility is contemplated within the OMCP area, which would be within the development footprint of the OMCP area. The OMCP FEIR identifies a program-level less than significant impact for fire and police protection services.

Schools

According to the OMCP FEIR, the Project area is within the Sweeter Union High School District (SUHSD) and San Ysidro Elementary School District (SYSA). The only SUHSD facility within the OMCP area is San Ysidro High School, located just west of the Project site. The schools within the SYSD that serve the OMCP area are: Beyer Elementary School (K-5), La Mirada Elementary School (K-5), Ocean View Hills (K-8), Smythe Elementary School (K-5), Sunset Elementary School (K-5), Willow Elementary School (K-5), and San Ysidro Middle School (6-8). The only SYSD school within the OMCP area is Ocean View Hills (K-8), located at 4919 Del Sol Boulevard, located approximately 0.8 mile northwest of the Project site. The OMCP FEIR determined that the payment of statutory fees by future Project Projects to the affected school district and adherence to policies contained in the OMCP would result in a less than significant impact to school facilities.

Parks and Recreation

The OMCP FEIR identifies the need for and/or provision of new park facilities to provide a minimum of 2.8 usable acres of population-based parks per 1,000 residents. New neighborhood and community park facilities already planned for within the OMCP area include Grand Park, Pacific Breezes, and Beyer Community Park. New development within the OMCP area would be required to provide park or recreation facilities or payment of the Development Impact Fee (DIF). New parkland or recreational facilities proposed as part of a development Project would be required to identify and mitigate for environmental impacts of park development. Based on these considerations, the OMCP FEIR identifies a less than significant, program-level impact to parks.

Libraries

The Otay Mesa-Nestor Library serves the Otay Mesa-Nestor and the Otay Mesa communities. The San Ysidro Library, which is located outside of the OMCP planning area, also serves residents of the OMCP area. The OMCP FEIR identifies that a library facility would be provided within the community as the Otay Mesa community further develops. At a program level, the OMCP FEIR identifies less than significant impacts associated with library services.

PROPOSED PROJECT

Fire and Police Protection Services

The Project site is in an area served by City fire and police protection services. Residential density would be less than assumed in the OMCP FEIR; therefore, population-based impacts associated with the implementation of the OMCP would be less than previously anticipated. The development of the Project site is consistent with that envisioned in the OMCP FEIR; thus no new impacts related to the provision of fire and police protection services would occur.

Schools

The Project would entail construction of 86 new residential dwelling units, consistent with the planned land use for the Project site, the development of which was included in growth projections analyzed in the OMCP FEIR. Residential density would be less than assumed in the OMCP FEIR; therefore, population-based impacts associated with the implementation of the OMCP would be less than previously anticipated. Thus, the number of students generated by the Project would be consistent with and less than those envisioned in the OMCP FEIR. The Project would be required to pay mitigation fees to the applicable school district and impacts would be less than significant. No new impacts would result from the proposed Project.

Parks and Recreation
While the Project would generate new park users which would utilize local parks, the proposed development is consistent with the underlying land use designation identified in the OMCP, and thus, has been considered as part of the FEIR analysis. Residential density would be less than assumed in the OMCP FEIR; therefore, population-based impacts associated with the implementation of the OMCP would be less than previously anticipated. As discussed in the OMCP FEIR, new development would be required to provide park or recreation facilities or pay the DIF and less than significant impacts would result. No new impacts would occur with the proposed Project.

Libraries
The development of the Project site is consistent with that envisioned in the OMCP FEIR and would not generate more library users than anticipated in the OMCP FEIR. Residential density would be less than assumed in the OMCP FEIR; therefore, population-based impacts associated with the implementation of the OMCP would be less than previously anticipated. Thus, no new impacts would occur.

Utilities

FEIR
Water Systems
Water in the OMCP area is provided by the City of San Diego and the Otay Water District (OWD). In general, the City provides water service to the western portion of the OMCP area and OWD to the eastern portion, generally east of Heritage Road. Implementation of the OMCP would result in an increase of 0.36 million gallons per day (mgd) in potable water demand. The OMCP FEIR identifies less than significant impacts associated with utility implements at the program-level. Future Project applicants would be required to coordinate the location of improvements with the City in compliance with City Design Guidelines and other utility agencies that require access to the facilities.

Wastewater
The City of San Diego provides wastewater services within the OMCP area via the Otay Mesa Trunk Sewer, the Otay Valley Trunk Sewer system, and the Metropolitan Sewerage System. Implementation of the OMCP would increase wastewater flows by 1.33 mgd over the buildout of the previously adopted community plan, for a total projected wastewater generation of 9.68 mgd. The OMCP identifies expected infrastructure improvements associated with the buildout of the OMCP, and identifies less than significant impacts associated with the provision of wastewater services at the program level. Future projects implemented in accordance with the OMCP would be reviewed as part of the project application to ensure avoidance of conflicts with existing utilities.

Reclaimed Water
Both the City and OWD produce recycled water for use in the southern San Diego area. Recycled water service in the OMCP area is planned to be provided by the OWD only. Based on the OMCP FEIR, there are no recycled water distribution lines in the OMCP area. The OMCP FEIR indicates that the OWD has not identified any recycled water infrastructure improvements that are necessitated by implementation of the OMCP. The OMCP FEIR identifies less than significant impacts associated with providing reclaimed water facilities at the program level. Future projects implemented in

accordance with the OMCP would be reviewed as part of the Project application to ensure avoidance of conflicts with existing utilities.

Solid Waste

The City of San Diego provides refuse, recycling, and yard waste collection and disposal services to some residents within the OMCP area, consisting of primarily single-family homes, and some multi-family homes. Most multi-family residences are not served and are required to fund and contract directly with private haulers for trash and recycling collection. Solid waste in the City is taken to three landfills: Miramar Landfill, Sycamore Sanitary Landfill, or the Otay Landfill. Buildout of the OMCP would almost double the amount of waste generated in the OMCP area (an estimated 106 tons per year at buildout versus approximately 55 tons for existing development); however, individual projects developed in accordance with the OMCP would be required to comply with numerous solid waste regulations to address the requirements for refuse and recyclable materials' deposit, diversion, and storage in an effort to achieve the City's overall 75 percent diversion goal. Future discretionary projects that would exceed the City's Significance Threshold for solid waste generation would be required to prepare a Waste Management Plan (WMP) with site-specific waste reduction measures to meet the state-mandated diversion rate, but because not all future projects would be required to prepare a WMP, the OMCP FEIR identifies a potentially significant, direct impact associated with solid waste services. Mitigation Framework Measure UTIL-1 requires discretionary projects that would generate 60 tons or more of solid waste to prepare a WMP. Impacts associated with solid waste remain significant and unavoidable, even with implementation of mitigation, as not all future projects would meet the threshold for preparing a WMP, and compliance with existing applicable ordinances along would not achieve a 75 percent diversion rate.

Stormwater Infrastructure

The OMCP FEIR identifies less than significant impacts associated with stormwater infrastructure. While implementation of the OMCP would result in increased impervious surfaces and may require stormwater systems in undeveloped areas, future projects would require localized improvements to the stormwater system as part of project design and review. Future projects would be required to prepare a drainage study, design and build storm drain systems, comply with the City's Storm Water Standards, as well as conformance with General Plan and OMCP policies. Impacts associated with stormwater infrastructure for OMCP buildout are less than significant.

Communications

There would be no significant impacts to cable and telephone services as a result of OMCP buildout, as these services are available through private utility companies that have the capacity to serve the OMCP area. Short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the OMCP would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way. The OMCP FEIR identifies communications impacts as less than significant.

PROPOSED PROJECT

Water Systems

The Project is located in a residentially-designated area with existing infrastructure in the Caliente Avenue ROW, and is consistent with the planned uses for the site. As part of the Project, water lines would be extended to connect with the water system being constructed on the adjacent development sites. Water usage at the site would be typical of multi-family residential uses. The

Project would include water-wise landscaping and plants included in the landscaping plan are consistent with City Landscape Water Conservation Ordinance; in addition, the Project would comply with the water conservation features outlined in the City Building Code and CALGreen Building Code. The Project would not require the construction or expansion of existing water facilities or infrastructure. No new impact would occur under the proposed Project.

Wastewater

The Project is consistent with the planned uses for the site, and is therefore, considered in the overall 9.68 mgd projected wastewater generation at the OMCP buildout. The Project is within the Otay Mesa Sewer Basin served by the Otay Mesa Trunk Sewer system and is subject to review from the City to ensure no conflicts with existing utilities would occur. The Project would construct private sewer lines but would not require the construction or expansion of existing wastewater facilities beyond those identified in the OMCP FEIR. No new impact would occur under the proposed Project.

Reclaimed Water

The Project site is not within the portion of the portion of the OMCP that is designed in the OMCP FEIR to be served by the ultimate reclaimed water system. As such, the Project would not result in impacts to the provision of reclaimed water facilities. No new impact would occur.

Solid Waste

A Conceptual WMP was prepared for the Project (SB&O, Inc., April 15, 2015), as required by Mitigation Framework Measure UTIL-1. Based on the detailed analysis of construction and operational waste sources and diversion practices, the Project would not result in a direct impacts to solid waste facilities, would comply with the City's ordinances related to the diversion and recycling of waste, and would not affect the City's ability to achieve its waste reduction goals. In addition, the Project would implement the provisions of its WMP as part of the construction and operational phases to offset its cumulative impacts related to creative more than 60 tons of waste. Therefore, less than significant impacts would occur under the proposed Project and no new impacts would arise that were not already identified in the OMCP FEIR.

Stormwater Infrastructure

While the Project would result in the placement of new impervious surfaces at the site, the volume of new stormwater runoff generated by the Project would not result in substantial quantities requiring new or expanded treatment facilities. Existing infrastructure is in place in the Project vicinity, and the Project site has been designated to accommodate the stormwater infrastructure facilities for development of residential uses. As discussed previously, the Project would include the installation of biofiltration basins for treatment of stormwater, followed by detention facilities for combined HMP control and storm attenuation. Stormwater facilities constructed as part of the Project would be designed consistent with City requirements and design guidelines. Impacts associated with stormwater infrastructure would be less than significant and no new impact would occur under the proposed Project.

Communications

Communications is demand based, and would be provided to the Project site. The Project is consistent with planned uses for the site and is within an area containing existing infrastructure. Impacts would be less than significant. No new impact would occur.

Water Supply

FEIR

As discussed above, water in the OMCP area is provided by the City of San Diego and the OWD. According to the OMCP FEIR, the City generally provides water service to the western portion of the OMCP area and OWD to the eastern portion of the OMCP area. The OMCP FEIR and its supporting water supply assessments (WSAs) determined that there is sufficient water supply to serve existing demands and projected demands of the OMCP. Water supply impacts of the OMCP are identified in the OMCP FEIR as less than significant.

The OMCP FEIR also identifies less than significant impacts associated with landscape plans. All future development associated with the OMCP would be required to conform to existing regulations, and the General Plan and OMCP policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance.

PROPOSED PROJECT

The proposed Project is consistent with OMCP land use designations for the site. As such, water supply demand of the Project site would have been projected and included in the overall WSA prepared to support the OMCP. The Project's water demand would be less than levels required by a residential development of more than 500 units; thus, a project-specific WSA is not required in accordance with the SB 610 criteria. Based on the prior assessments, sufficient water supply is available to support existing and projected demands within the OMCP. As such, impacts on water supply associated with the proposed Project's demand would be less than significant. The Project would be consistent with existing regulations, and General Plan and OMCP policies requiring the use of predominately drought-resistant landscaping and water conservation measures for landscape maintenance. Impacts are less than significant and no new water supply impacts would occur under the proposed Project.

Population and Housing

FEIR

The OMCP allows for an almost three-fold increase in acreage for residential and/or village uses as compared to the amount of developed residential uses in 2012. However, this population increase is identified as a less than significant impact because it is primarily accommodated in multi-family dwelling units rather than single-family housing, increasing the intensity of residential development in the OMCP area. It would: implement SANDAG's Regional Comprehensive Plan and Regional Housing Element and the City's General Plan and Housing Element; increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast; and focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the Regional Comprehensive Plan and General Plan goals and policies.

Less than significant impacts are identified in the OMCP FEIR for compliance with the City's Inclusionary Affordable Housing Ordinance. The OMCP land use designations and design guidelines are intended to foster the development of housing for all income levels, with 77 percent of the additional units proposed in the OMCP consisting of multi-family units. The OMCP provides affordable housing units consistent with federal and state regulations and the City's objective of

increasing the affordable housing stock. Population and housing impacts are identified in the OMCP FEIR as less than significant.

PROPOSED PROJECT

The Project is consistent with the land use designations for the Project site identified in the OMCP. As such, development of 86 multi-family housing units proposed by the Project would be consistent with the expected population increase attributable to the Project site. The Project's proposed 86 units would be consistent with what was envisioned in the OMCP FEIR and no new population impacts would result. No mitigation is required.

Agricultural and Mineral Resources

FEIR

Agricultural Resources

Agricultural uses within the OMCP area are located south of Otay Mesa Road between Spring Canyon and La Media Road and occupy approximately 306 acres. The OMCP FEIR identifies agricultural uses as an interim use pending conversion to nonagricultural uses. The OMCP area does not contain Prime Farmland, but contains 192 acres of designated important farmland (Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land, as designated by California's Farmland Mapping and Monitoring Program [FMMP]). The OMCP FEIR indicates that although implementation of the OMCP would convert additional Important Farmland to non-agricultural uses, the areas that would be converted are fragmented and surrounded by urban land uses and MHPA lands. Additionally, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts have contributed to a significant reduction in future agricultural viability within the OMCP area. For these reasons, the OMCP FEIR identifies agricultural uses as interim uses and development of the OMCP would result in less than significant impacts to agricultural uses.

Mineral Resources

The OMCP area contains two designations for Mineral Resource Zones (MRZs) – MRZ-2, which are lands of identified mineral resource significance and MRZ-3, which are areas containing mineral deposits that have not been adequately tested to determine the significance of materials present. There are 330 acres of land designated as MRZ-2, and approximately 9,000 acres of land designated as MRZ-3. The OMCP FEIR identifies less than significant impacts to mineral resources from buildout of the OMCP.

PROPOSED PROJECT

Agricultural Resources

The Project site is designated as Farmland of Local Importance and Grazing Land by the Farmland Mapping and Monitoring Program. The Project would result in the development of multi-family residential uses on the site, consistent with the intended land use identified in the OMCP. As identified in the OMCP FEIR, agricultural uses are an interim land use pending conversion to nonagricultural uses. The Project would not result in new impacts associated with agricultural uses, and impacts would be less than significant. No mitigation is required.

Mineral Resources
The Project site is located within an area containing the MRZ-2 designation. The Project site is designated for multi-family residential land uses and development of the Project would be consistent with the existing land use designation. The Project site is not planned for mineral resource activities, nor is it identified as an area containing significant resources. Impacts would be less than significant and no new impact would occur. No mitigation is required.

Greenhouse Gas Emissions

FEIR

The OMCP FEIR identifies potentially significant impacts associated with consistency with local GHG reduction measures and consistency with State GHG reduction strategies. While the OMCP contains policies that would reduce GHG emissions from transportation and operational building use and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions, because project-level details are unknown, there is a potential that projects would not meet the necessary City reduction goals and Assembly Bill 32 (AB 32). As such, OMCP FEIR impacts were identified as potentially significant. Mitigation Framework Measure GHG-1 requires future projects implemented in accordance with the OMCP to demonstrate avoidance of significant impacts related to long-term GHG emissions and to incorporate GHG reducing features or mitigation measures to show a 28.3% reduction in GHG emissions, relate to business as usual (BAU) to meet AB 32 year 2020 target levels. Even with implementation of mitigation framework, the OMCP FEIR identifies significant and unavoidable impacts related to GHG emissions at the program level, because GHG reduction measures are best quantified at the project level, and because project-specific design information is required to calculate accurate GHG emissions.

Cumulative GHG emissions associated with the OMCP are identified in the FEIR as significant and unavoidable. The OMCP contains policies that would serve to reduce consumption of fossil-fueled vehicles and energy, resulting in a reduction in communitywide GHG emissions relative to BAU; however, these policies are not quantifiable in terms of GHG emissions at the program level). Additionally, with implementation of GHG reductions based on statewide regulations on vehicle GHG emissions and building energy and water use, the OMCP's projected GHG emissions would not meet the 28.3%GHG reduction relative to 2020 target levels. Mitigation Framework Measure GHG-2 requires future projects to demonstrate their avoidance of significant impacts related to long-term operational emissions. Adherence to mitigation identified in the OMCP FEIR would not reduce impacts to less than significant on a program level. Impacts remain significant and unavoidable.

PROPOSED PROJECT

A GHG Technical Study was prepared for the Project by Scientific Resources Associated (SRA) in March 2016. The Project site is currently undeveloped and is not a source of existing GHG emissions in the region.

Construction GHG emissions for the Project were calculated and include emissions from heavy construction equipment, truck traffic, and worker trips. Table 4 presents the construction-related emissions associated with Project development.

Table 4 - Construction GHG Emissions (metric tons/year)

Scenario	CO_2e[1] Emissions, metric tons	Amortized CO_2e Emissions (metric tons/year)
Construction Emissions	3,220	107

Source: SRA (2016)

[1] CO_2e = carbon dioxide equivalents

As described in the GHG Technical Study, in order to calculate GHG emissions due to operation of the Project, emission estimates were made for the five primary sources of GHG emissions associated with additional development: area sources, energy usage (including electricity and natural gas usage), water consumption, solid waste handling, and transportation. Emissions of these five primary sources were calculated for build-out of Project under Business as Usual (BAU) Conditions and are presented in Table 5.

Table 5 - Summary of Estimated Operational GHG Emissions

Emission Source	Annual Emissions (metric tons/year)			
	CO_2	CH_4	N_2O	CO_2e
Area Sources	1	0.0010	0.0000	1
Electricity Use	85	0.0035	0.0010	85
Natural Gas Use	54	0.0010	0.0010	54
Water Use	24	0.1470	0.0037	24
Solid Waste Management	4	0.2373	0.0000	4
Vehicle Emissions	604	0.0277	0.0000	605
Amortized Construction Emissions	107	0.0000	0.0000	107
Total	879	0.4175	0.0057	892
Global Warming Potential Factor	1	28	265	
CO2 Equivalent Emissions	879	11	2	892
Total CO2 Equivalent Emissions	892			

Source: SRA (2016)

As shown in Table 5 above, the Project would result in GHG emissions of approximately 892 metric tons of CO2e, which is less than the 900-metric ton screening threshold proposed by California Air Pollution Control Officers Association (CAPCOA) that is cited in the OMCP FEIR as a screening threshold for determining if a project must prepare a detailed GHG evaluation. Accordingly, the Project would meet the goals of AB 32 and would not result in cumulatively considerable significant global climate impacts. No new impact would occur.

The Project is consistent with and would meet the goals of the City's Conservation Element, and as such, would be consistent with the City's GHG reduction plans and policies. The Project would meet the most recent 2013 Title 24 energy efficiency standards, which are estimated to exceed 2008 Title 24 standards by 15%. The Project would, therefore, employ sustainable building development practices to maximize energy efficiency, and minimizing energy use through building design, and installation of energy-efficient appliances that meet EnergyStar requirements. Also, the products used for construction would meet California requirements for low-VOCs in various types of construction materials. The Project would reduce construction and demolition waste and would use recycled/sustainable materials for construction and during operation. The Project would install landscaping that minimizes water use, utilizes efficient irrigation practices, and reduces the use of

pesticides. The Project includes water-efficient landscaping and water conservation measures in the building, including the use of low-flow fixtures as required by 2013 Title 24 standards. Through implementation of these practices, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

In conclusion, the OMCP FEIR calls out significant and unavoidable impacts related to GHG emissions until such time that future projects can demonstrate avoidance of significant impacts. As discussed above, the Project is consistent with the requirements of the OMCP FEIR Mitigation Framework. A project-level GHG study was prepared and the results of the study show that the Project would result in less than 900 metric tons of CO2e, which is the screening criteria cited in the OMCP FEIR. Therefore, it can be concluded that the Project's emissions would not be cumulatively considerable, the project is consistent with the OMCP policies and citywide Climate Action Plan (CAP) policies applicable to the OMCP area, and no further analysis or mitigation is required.

V. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The Southview East Project shall be required to comply with all mitigation measures outlined within the Mitigation, Monitoring and Reporting Program of the previously certified OMCP FEIR No. 30330/304032, SCH No. 2004651076 and the Project-specific subsequent technical studies required in accordance with the OMCP FEIR Mitigation Framework. The following MMRP identifies measures which specifically apply to this Project.

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

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

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

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

   http://www.sandiego.gov/development-services/industry/standtemp.shtml

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

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

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

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

   Qualified Biologist

Qualified Archaeologist
Native American Monitor

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

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**

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

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 371807 and /or Environmental Document Number 371807, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.)

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

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

NOT APPLICABLE

4. **MONITORING EXHIBITS**

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

NOTE: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying Projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:**

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

Document Submittal/Inspection Checklist

Issue Area	***Document submittal***	***Assoc Inspection/Approvals/Notes***
General	Consultant Qualification Letters	Prior to Pre-construction Meeting
General	Consultant Const. Monitoring Exhibits	Prior to or at the Pre-Construction meeting
Biology	Biology Reports	Biology site observation
Archeology	Archaeology Reports	Archaeology/Historic site observation
Noise	Acoustical Reports	Noise mitigation features inspection
Bond Release	Request for Bond Release letter	Final MMRP inspections prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Land Use

Mitigation for Indirect Impacts Associated with MHPA Land Use Adjacency:

Mitigation Measure LU-2 from the OMCP FEIR requires that Projects adjacent to the MHPA comply with the Land Use Adjacency Guidelines of the MSCP. Therefore, to mitigate for significant edge effect impacts due to grading/land development, drainage, toxics, lighting, public access, invasive plant species, and noise, the following measures shall be required. While these measures are meant to protect the MHPA, they are also required to address potential indirect impacts to vernal pools and road pools that support fairy shrimp and nesting raptors (potentially northern harrier and burrowing owl) in the MHPA.

Mitigation for impacts to drainage and toxics, lighting, noise, invasive plant species, grading/land development, and raptor nesting impacts is required for construction of the Southview East subdivision.

I. Prior to issuance of any construction permit or notice to proceed, Development Services Department /Land Development Review, and/or MSCP staff shall verify the applicant has accurately represented the Project's design in or on the Construction Documents (CDs/CDs consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A," and also the City's MSCP MHPA Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CDs of the following:

A. **Grading/Land Development/MHPA Boundaries:** MHPA boundaries on site and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the development footprint, specifically

manufactured slopes, disturbance, and development within or adjacent to the MHPA. For Projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

B. **Drainage**: The use of structural and non-structural Best Management Practices, Best Available Technology, and use of sediment catchment devices downstream of paving activities shall be used to reduce potential impacts associated with construction. The Project design shall comply with the Standard Urban Stormwater Management Plan and Municipal Stormwater Permit criteria of the State Water Resources Control Board and City.

Natural drainage patterns shall be maintained as much as possible during construction. Erosion control techniques, including the use of sandbags, hay bales, and/or installation of sediment traps, shall be used to control erosion and deter drainage during construction activities into the MHPA, vernal pools, and road pools.

C. **Toxics/Project Staging Areas/Equipment Storage:** No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Provide a note in/on the CDs that states: "*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.*"

No staging/storage areas for equipment and materials shall be located within or adjacent to the MHPA, vernal pools, or road pools.

No trash, oil, parking, or other construction related activities shall be allowed outside the established limits of grading. All construction related debris shall be removed off site to an approved disposal facility.

D. **Lighting:** Lighting within or adjacent to the MHPA shall be directed away/shielded and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.

E. **Invasive Plant Species:** No invasive, non-native plant species shall be introduced to the site during construction (e.g., on the undercarriages of vehicles). Vehicles and equipment brought to the site shall be washed at an appropriate offsite location/facility prior to entering the site.

F. **Noise:** Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the coastal California Gnatcatcher (March 1 through August 15). If construction is proposed during the breeding season for the species, USFWS protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring. When applicable

(i.e., habitat is occupied or if presence of the Covered Species is assumed), adequate noise reduction measures shall be incorporated as follows:

COASTAL CALIFORNIA GNATCATCHER (Federally Threatened) Prior to the issuance of any grading permit the City Manager (or appointed designee) shall verify that the MHPA boundaries and the following Project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall 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 gnatcatcher habitat shall 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 shall 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 gnatcatcher 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 shall 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) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB hourly average at the edge of habitat (within the MHPA) occupied by the gnatcatcher. Concurrent with commencement of construction activities and construction of necessary noise attenuation facilities, noise monitoring* shall 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 shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

* Construction noise shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity to verify that noise levels at the edge of occupied habitat within the MHPA are maintained below 60 dB hourly average or to the ambient noise level if it already exceeds 60 dB hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels within occupied MHPA habitat to below 60 dB hourly average or to the ambient noise level if it already exceeds 60 dB hourly average. Such measures may include but are not limited to limitations on the placement of construction equipment and the simultaneous use of equipment.

B. If gnatcatchers are not detected within the MHPA during the protocol survey, the qualified biologist shall 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 gnatcatcher 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.

Historical Resources (Cultural Resources/Archaeology)

In order to avoid potential historical resources impacts due to grading activities, the following mitigation measures shall be implemented by the Project applicant:

I. Prior to Permit Issuance

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

B. Letters of Qualification have been submitted to ADD
   1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the Project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
   2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the Project meet the qualifications established in the HRG.
   3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

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

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching
   1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area**

being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries. The RE shall forward copies to MMC.

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

C. Determination of Significance
   1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
      a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
      b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**

c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

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

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

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

C. If Human Remains **ARE** determined to be Native American
   1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
   2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
   3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
   4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
   5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
      a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
      b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
      c. In order to protect these sites, the Landowner shall do one or more of the following:

(1) Record the site with the NAHC;
(2) Record an open space or conservation easement on the site;
(3) Record a document with the County.

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

D. If Human Remains are **NOT** Native American
1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

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V. Night and/or Weekend Work

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

B. If night and/or weekend work becomes necessary during the course of construction
1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

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

B. Handling of Artifacts

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

C. Curation of artifacts: Accession Agreement and Acceptance Verification

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

treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

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

Biological Resources

In order to avoid potential direct and indirect biological resources impacts, the following mitigation measures shall be implemented by the Project applicant:

General Mitigation Measures

I. Prior to Construction

A. **Biologist Verification**: The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) Section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (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.

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

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

D. **Biological Construction Mitigation/Monitoring Exhibit:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the biological documents in C, above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements, (e.g. coastal cactus wren, plant salvage, burrowing owls exclusions, etc.) avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City 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.

E. **Avian Protection Requirements:** To avoid any direct impacts to raptors and/or any native/migratory birds, 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.

F. **Resource Delineation:** 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 site.

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

II. During Construction Monitoring-

All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the 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.

A. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all Project activities that directly impact the resource shall be delayed until species specific local, State or Federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL 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.

Mitigation for Direct Impacts to Upland Vegetation Communities

The Project will meet all required upland habitat mitigation through on-site preservation. Prior to the issuance of any construction permits, Project upland impacts shall be mitigated in accordance with the City's LDC Biology Guidelines thorough placement of a Covenant of Easement (in favor of the City, CDFW and USFWS) over the preserved mitigation land on-site, as presented in Table 6. This table presents the mitigation for significant, direct impacts to non-native grassland (Tier IIIB).

Table 6 – Mitigation for Direct Impacts to Vegetation Communities

Vegetation Community	Impacts (Inside/Outside MHPA)	Mitigation Ratio	Required Mitigation
Non-native grassland	6.9	0.5:1[1]	3.5
TOTAL	**6.9**	**--**	**3.5**

Source: Alden Environmental (2016)

Footnote:

[1] If the burrowing owl is found to be present during the preconstruction/take avoidance surveys, the 0.5:1 ratio would increase to 1:1 ratio resulting in a 0.3 acre shortage of non-native grassland mitigation on site. If this was to occur, it is proposed that 0.3 acre of what would be a total of 10.8 acres on site would be used for mitigation.

Note: Impacts associated with the future construction of Airway Road, which the project is not implementing, are detailed in the Project Biological Technical Report.

Direct impacts to 6.9 acres of non-native grassland would be mitigated through the preservation of 3.45 acres of non-native grassland on site. Under this scenario (i.e., the burrowing owl is absent), there would be 3.7 acres of non-native grassland not required for mitigation that would be preserved as surplus (after consideration for future impacts associated with the Airway Road extension). Should the burrowing owl be found during the pre-construction/take avoidance surveys,

however, the required mitigation for impacts to non-native grassland outside the MHPA would double. Therefore, the total required mitigation could be 6.9 acres.

Ownership in fee title will be maintained by the subdivision Owner/Permittee. Prior to certificate of occupancy, the applicant shall identify a Habitat Manager pursuant to the Southview East Project Habitat Management Plan (HMP; Alden 2016a), to be approved by the City of San Diego, and submit evidence that a funding source has been secured to fully implement the HMP in perpetuity. Management of the land will be performed by the approved Habitat Manager, as directed by the HMP. The purpose of the HMP is to identify methods and means necessary to maintain and enhance habitat (and related wildlife) values of the preserved land in perpetuity.

Mitigation for Direct Impacts to Sensitive Animal Species

San Diego Black-tailed Jackrabbit, Raptor Foraging, and California Horned Lark
Direct impacts to San Diego black-tailed jackrabbit, raptor foraging, and California horned lark nonnative grassland habitat from the subdivision Project shall be mitigated through the on-site preservation of habitat as described above in *Mitigation for Direct Impacts to Upland Vegetation Communities*.

Burrowing Owls

Prior to Permit or Notice to Proceed Issuance:
1. As this Project site has been determined to be burrowing owl occupied or to have burrowing owl occupation potential, the Permit Holder 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 burrowing owl construction impact avoidance program.

2. The Qualified burrowing owl Biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City's burrowing owl requirements and subsequent survey schedule.

Prior to Start of Construction:
1. The Permit Holder and Qualified Biologist must ensure that 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 burrowing owl eviction(s) and shall include maps of the Project site and burrowing owl locations on aerial photos.

2. The pre-construction survey shall follow the methods described in CDFG 2012, Staff Report -Appendix D (please note, in 2013, CDFG became California Department of Fish and Wildlife).

3. 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 Mitigation Monitoring and Coordination (MMC) Section. If results of the pre-construction surveys have changed and burrowing owl are present in areas not previously identified, immediate notification to the City and WAs shall be provided prior to ground disturbing activities.

During Construction:

1. **Best Management Practices**-shall be employed as burrowing owl are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects which are burrowing owl occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied burrowing owl areas, should undertake measures to discourage burrowing owls 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.

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

A**. Post Survey Follow-Up if burrowing owl 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 burrowing owls are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.

2) If no active burrows are found but burrowing owls 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 burrowing owl 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 burrowing owls and/or Active Natural or Artificial Burrows are detected during the Initial Pre-Construction Survey-** Monitoring the site for new burrows is required using 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 burrowing owls within the MHPA SHALL be avoided**.

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

b) **During Breeding Season** - If a burrowing owl is using a burrow on site during the breeding season (February 1– August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the burrowing owls 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).

Post Construction:

1. Details of the all surveys and actions undertaken on site with respect to burrowing owls (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 burrowing owl locations on aerial photos.

Avian Protection

Mitigation Measure BIO-2 from the OMCP FEIR requires implementation of mitigation to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Fish and Game Code, and/or the ESL Regulations. To protect nesting birds, vegetation clearing for the subdivision Project shall take place outside the general avian breeding season (which generally occurs from February 1 through September 15). See *Avian Protection, Subsection I.E, Avian Protection Requirements*, above, for more details.

Noise

In order to avoid potential interior noise impact due to transportation noise from SR-905, the following mitigation measure shall be implemented by the Project applicant:

An interior noise analysis would be required to be approved by the City's Building Inspection Department upon application for a building permit. This interior noise analysis must identify the sound transmission loss requirements for building façade elements (windows, walls, doors, and exterior wall assemblies) necessary to limit interior noise in habitable rooms to 45 dBA CNEL or below. Upgraded windows and/or doors with Sound Transmission Class (STC) ratings of 30 or higher may be necessary. If the interior noise limit can be achieved only with the windows closed, the building design must include mechanical ventilation that meets California Building Code (CBC) requirements. Worst-case noise levels, either existing or future, must be used.

With the implementation of the findings of the interior noise analysis, interior noise levels in habitable rooms would be 45 dBA CNEL or below and comply with the California Code of Regulations, Title 24: Noise Insulation Standard City of San Diego General Plan Noise Compatibility Guidelines requirement.

All HVAC units shall be placed over 40 feet from Project property lines, or HVAC units shall produce a sound power level of 63 dBA Leq or below, which would reduce property line noise levels to 45 dBA Leq or below.

Prior to commencement of Project construction, placement of a 10-foot-high noise barrier along the full west property line shall be completed, or time restrictions on construction activity within 315 feet of the west property line shall be implemented to reduce construction noise levels at the west Project property line to 75 dBA Leq (12 hours) or below. With this noise mitigation, Project construction noise levels would comply with City of San Diego construction noise limits.

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.

VI. SIGNIFICANT UNMITIGATED IMPACTS:

There are no new significant impacts identified for the current project. However, the Final EIR for the original project identified significant unmitigated impacts relating to air quality, noise, traffic/circulation, utilities, and greenhouse gas emissions. Because there were significant unmitigated impacts, associated with the original project approval required the decisionmaker 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

November 15, 2016

Anna L. McPherson AICP
Senior Planner
Development Services Department

Date of Final Report

Analyst: **R. Benally**

Attachments:
Figure 1: Regional Location Map
Figure 2: Site and Vicinity Map
Figure 3: Site Plan
References

Copies of the addendum, the Final EIR, the Mitigation Monitoring and Reporting Program, and any technical appendices may be reviewed in the office of the Land Development Review Division of the Development Services Department, or purchased for the cost of reproduction.

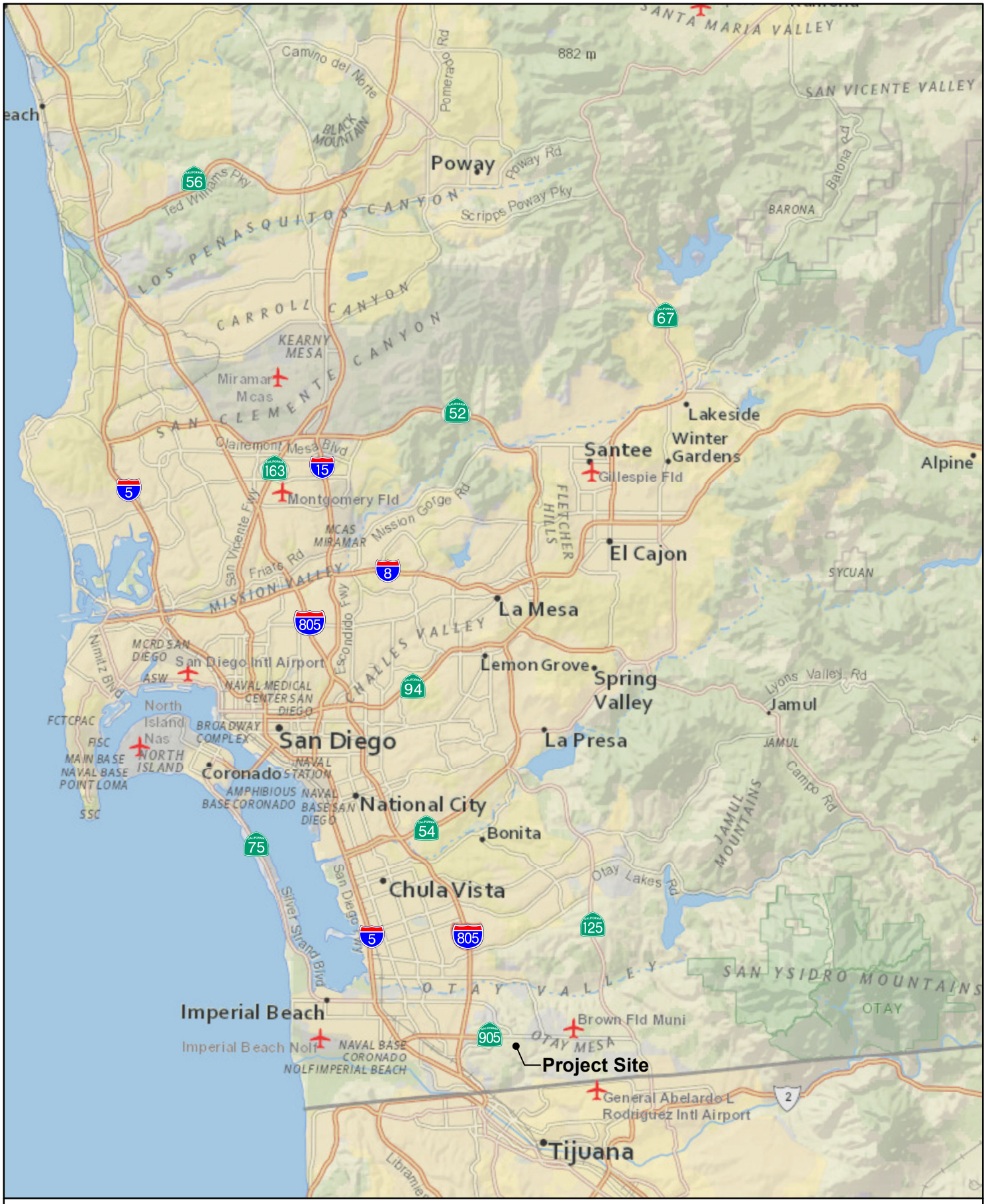


Figure 1

Regional Location Map

SOUTHVIEW EAST PROJECT

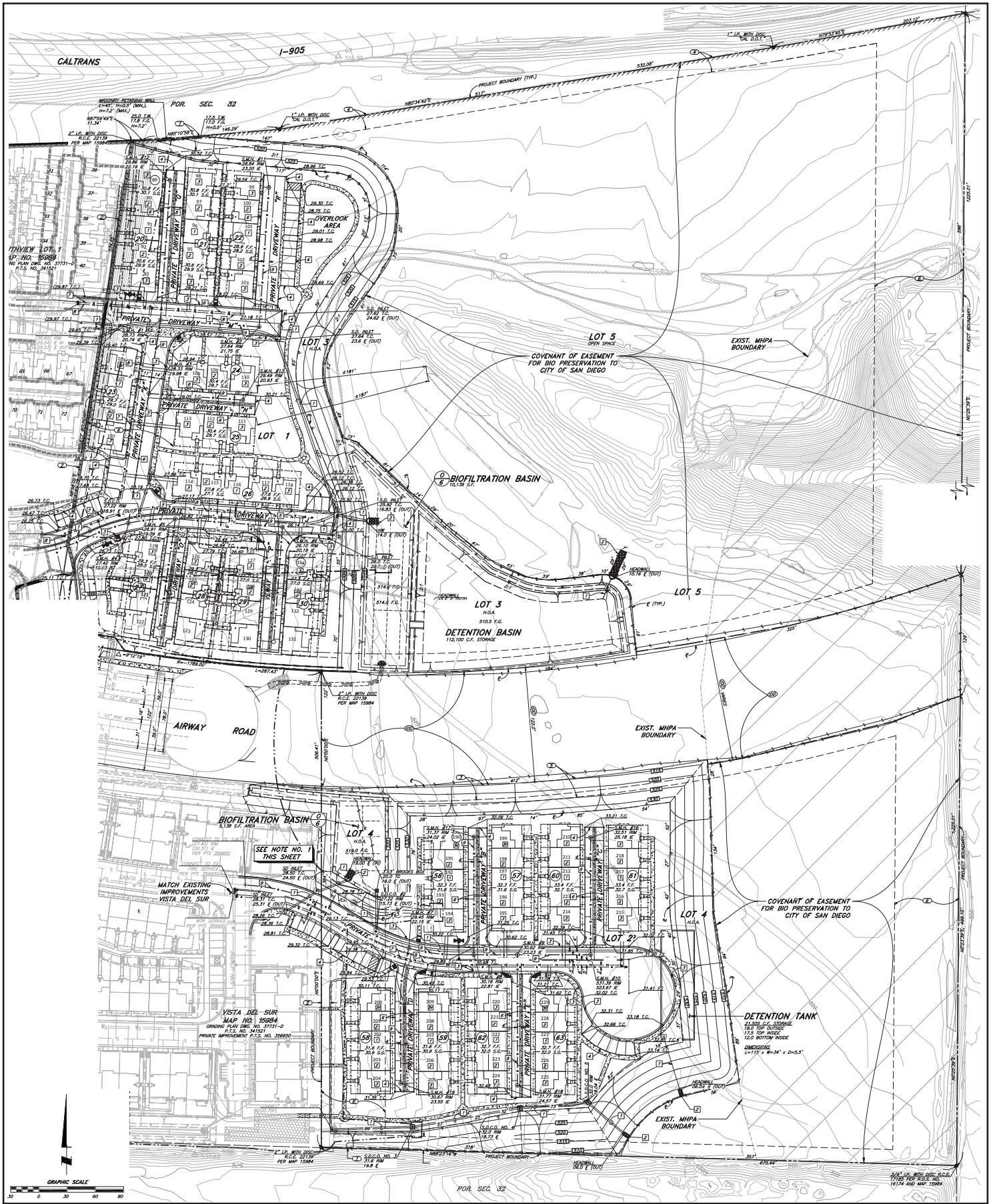
Figure 2

Project Site Aerial

SOUTHVIEW EAST PROJECT

N

0 400 Feet



Source: SB&O Inc. 2016

Figure 3

Project Site Plan

SOUTHVIEW EAST PROJECT

REFERENCES:

Alden Environmental, Inc.

2016a Biological Technical Report for the Southview East Project. September.

2016b Southview East Habitat Management Plan. September.

ASM Affiliates

2016 Archeological Survey and Evaluation Report for the Southview East Project within the Otay Mesa Community Planning Area, San Diego, California. June.

City of San Diego

2015 Otay Mesa Community Plan Update. June. http://www.sandiego.gov/planning/community/profiles/otaymesa/pdf/otaymesa.pdf

2014 Otay Mesa Community Plan Update Final Environmental Impact Report. Revised February 21.

2012 Land Development Code Biology Guidelines. Adopted September 1999. Last amended April 23, 2012 by Resolution No. R-307376.

2011 CEQA Significance Determination Thresholds. Last amended January 2011.

2008 City of San Diego General Plan. Adopted March 10.

2003 Land Development Code Trip Generation Manual. Revised May.

1997 Multiple Species Conservation Program. City of San Diego MSCP Subarea Plan. March.

Airport Land Use Commission

2010 Brown Field Airport Land Use Compatibility Plan. January 25.

dBF Associates, Inc.

2016 Exterior Noise Analysis Report, Southview East, Otay Mesa, CA. January 4.

Geocon Incorporated

2015 Update Geotechnical Letter, Southview East, San Diego, California. December 8.

2014 Additional Detention Basin Recommendations, Southview East, San Diego, California. December 15. Revised April 8, 2015.

Kimley-Horn

2016 Southview Driveway Signal Warrant Analysis. April 19.

2015 Southview-East Trip Generation. April 19.

SB&O Inc.

2016a Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) for Southview East, Project #371807. August 11.

2016b Detention Basin Design Report. May 6.

2015 Conceptual Waste Management Plan for Southview East, City of San Diego, Project No. 371807. April 15.

Scientific Resources Associated

2016 Global Climate Change Evaluation for the Southview East Project. March 9.

South Coast Air Quality Management District's
1993 *CEQA Air Quality Handbook*

United States Fish and Wildlife Service (USFWS)
2011 50 CFR Part 17 Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for the Riverside Fairy Shrimp. Federal Register / Vol. 76, No. 105 / Wednesday, June 1 / Proposed Rules.