THE CITY OF SAN DIEGO

ADDENDUM TO A PROGRAM ENVIRONMENTAL IMPACT REPORT

Project Number: 408329
Addendum to PEIR No. 30330/30432
SCH No. 2004651076

SUBJECT: CENTRAL VILLAGE SPECIFIC PLAN: COUNCIL APPROVAL to adopt the Central Village Specific Plan (CVSP) for a 229.2-acre portion of the Otay Mesa Community Plan, an amendment to the adopted Otay Mesa Community Plan, and a rezone to accommodate the land uses proposed by the Specific Plan. The Project would result in up to 4,485 multi-family homes and 139,700 square feet of commercial uses, along with supporting recreational areas, open space, and a combined school/recreation site.

Applicant: CR Otay Canyon Ranch Associates, LLC, successor in interest to ColRich, Inc.

March 2017 Update: Subsequent to the Planning Commission hearing on February 23, 2017, the Addendum was revised to: include information related to the Project Description inadvertently omitted during document production, clarify throughout the document the total number of dwelling units assigned to the Central Village by the Otay Mesa Community Plan, and to reformat the Greenhouse Gas Emissions analysis consistent with the Climate Action Plan Conformance Evaluation for Community Plan Updates. Additionally, other minor edits were incorporated to address typographical errors and misspellings. The revisions are made in ~~strike-out~~/underline. These revisions do not affect the environmental analysis or conclusions of the document.

I. PROJECT DESCRIPTION

The project proposes the adoption of the Central Village Specific Plan (CVSP) to develop the 229.2-acre property with up to 4,485 multi-family homes, 139,700 square feet (s.f.) of commercial space, a 13.1-acre combined school/recreation site, 16.1 acres of population-based park land uses, 15.9 acres of open space, and approximately 24.1 acres of major roadways. The CVSP includes Design Standard 2.2-1, which requires that in the event the 13.1-acre school/recreation site is not developed with school/recreation uses, that the area may instead be developed with up to 197 multi-family homes, through the Formal Specific Plan Amendment process. Thus, the 197 multi-family homes are not a part of the proposed Project, and are not evaluated in this EIR Addendum. The proposed Project involves an Amendment to the Otay Mesa Community Plan to update the Community Plan to reflect the land use plan proposed as part of the CVSP; the adoption of the ~~Central Village Specific Plan (~~CVSP~~)~~; and a Rezone to change the zoning of the CVSP property to accommodate the proposed uses, to establish base zones throughout the CVSP area, and to provide supplemental use regulations and development standards that would apply specifically and exclusively to the CVSP area. The proposed land uses are generally in conformance with the land uses assumed for the site by the 2014 Otay Mesa Community Plan Update (OMCPU) Environmental Impact Report (EIR), which anticipated up to ~~5,246~~ 4,768 multi-family homes and up to 32,700 s.f. of commercial uses within the geographic boundary of the CVSP. Table 1, *Central Village Specific Plan Land Use Abstract*, presents the land use distribution of the various uses proposed as part of the Project.

Discretionary approvals include applications for a Community Plan Amendment, Specific Plan, and Rezone (collectively referred to herein as the "Project" or "proposed Project"). Each is discussed below.

Community Plan Amendment (CPA)

OMCPU Subsection 2.1 and Policy 2.1-1 require the establishment of a Specific Plan encompassing the 229.2-acre Central Village. Prior to the adoption of a Specific Plan, the OMCPU explicitly requires the adoption of an Amendment to the OMCP (CPA). Accordingly, an amendment to the OMCP is proposed as part of the Project to revise the OMCP text and exhibits as necessary to ensure consistency between the Specific Plan and the OMCP. Specifically, the proposed CPA would: revise Figures 1-2, 2-1, 2-2, 2-5, 2-6, 2-7, 3-5, 3-6, 4-1, 6-1, and 9-1 to reflect the land use configuration proposed as part of the Specific Plan (refer to Figure 5, herein); revise Figures 3-2, and 3-5 to add reference to refer to the Specific Plan for proposed facilities; revise Figure 5-1 to remove paper streets shown in the Central Village area; amend Table 2-2, *Planned Land Use Distribution*, to remove the breakout between residential and mixed use under the Village category; amend Table 2-3, *Community Plan Land Use Designations*, to change the density range for Community Village to 10-44 du/ac to result from the CVSP; amend Table 2-5, *Estimated Otay Mesa Residential Summary Table at Build-Out*, to reflect the number of multi-family residential units to result from buildout of the CVSP; amend Table 2-6, *Otay Mesa Residential Density Ranges*, to change the multi-family residential units and density range for the Community Village;; and miscellaneous text revisions to ensure internal consistency within the OMCP and to ensure consistency between the proposed CVSP and the OMCP.

Central Village Specific Plan (CVSP)

The Project proposes the adoption of the Central Village Specific Plan (CVSP) to allow for the development of the 229.2-acre property with up to 4,485 multi-family homes, 139,700 square feet (s.f.) of commercial space, a 13.1-acre combined school/recreation site, 16.1 acres of population-based park land uses, and approximately 24.1 acres of major roadways; 15.9 acres would be preserved as open space. The CVSP is separated into five distinct elements and an implementation section. Each is discussed below.

- **Land Use Element.** The Land Use Element of the CVSP primarily establishes the range of allowable land uses within the Central Village area. Figure 5, *Central Village Specific Plan Land Use Plan*, depicts the configuration of land uses within the proposed community. As shown, for planning purposes the Central Village has been separated into 22 planning areas, as summarized in Table 1, *Central Village Specific Plan Land Use Abstract.* The CVSP provides for the following land uses:

    - Moderate to High Density (MH) Mixed Use: Provides for up to 139,700 square feet of commercial floor space and 2,046 homes on 54.5 acres, within an allowable density range of 15 to 44 dwelling units per acre (du/ac);

    - Moderate to High Density (MH) Multi-Family: Provides for up to 495 homes on 12.4 acres, within an allowable density range of 15 to 44 du/ac;

    - Medium Density (MD) Multi-Family: Provides for up to 1,444 homes on 50.3 acres, within an allowable density range of 15 to 29 du/ac;

    - Low Density (LD) Multi-Family: Provides for up to 500 homes on 28.3 acres, within an allowable density range of 10 to 29 du/ac;

    - Parks: Provides for passive and active recreation on 16.1 acres, intended to meet a portion of the population-based parkland requirements within the Central Village;

    - Open Space: Provides for the preservation of 15.9 acres of undeveloped open space; and

Table 1 Central Village Specific Plan Land Use Abstract

Planning Area	General Plan Land Use	Specific Plan Land Use	Target Density Range*	Gross Acres	Net Acres**	Dwelling Units	Projected Population	Maximum Commercial Square Footage
1	Neighborhood Village (15-44 du/ac)	MH Multi-Family	35-44	6.7	6.7	295	1,018	--
2	Neighborhood Village (15-44 du/ac)	MH Mixed Use	35-44	14.8	12.8	563	1,942	43,200
3	Neighborhood Village (15-44 du/ac)	MH Mixed Use	25-40	11.1	9.5	333	1,149	15,000
4	Neighborhood Village (15-44 du/ac)	MH Mixed Use	35-44	15.6	14.8	598	2,063	27,500
5	Residential – Medium (15-29 du/ac)	MD Multi-Family	20-29	20.0	18.7	529	1,825	--
6	Residential – Medium (15-29 du/ac)	MD Multi-Family	20-29	15.2	12.5	362	1,249	--
7	Residential – Low Medium to Medium (10-29 du/ac)	LD Multi-Family	15-29	13.6	13.1	197	680	--
8	Residential – Low Medium to Medium (10-29 du/ac)	LD Multi-Family	15-29	16.1	15.2	303	1,045	--
9	Neighborhood Village (15-44 du/ac)	MH Mixed Use	25-40	12.2	12.2	324	1,118	26,500
10	Neighborhood Village (15-44 du/ac)	MH Mixed Use	35-44	6.0	5.2	228	787	27,500
11	Residential – Medium (15-29 du/ac)	MD Multi-Family	20-29	10.0	9.7	281	969	--
12	Residential – Medium (15-29 du/ac)	MD Multi-Family	20-29	9.8	9.4	272	938	--
13	Neighborhood Village (15-44 du/ac)	MH Multi-Family	25-40	6.5	5.7	200	690	--
14	Institutional	School/Recreation	(15-29)***	15.5	13.1	(197)***	(680)***	--
15	Population-Based Park	Park	--	3.5	3.5	--	--	--
16	Population-Based Park	Park	--	3.1	3.1	--	--	--

Table 1 Central Village Specific Plan Land Use Abstract

Planning Area	General Plan Land Use	Specific Plan Land Use	Target Density Range*	Gross Acres	Net Acres**	Dwelling Units	Projected Population	Maximum Commercial Square Footage
17	Population-Based Park	Park	--	3.5	3.5	--	--	--
18	Population-Based Park	Park	--	6.0	6.0	--	--	--
19	Open Space	Open Space	--	3.2	3.2	--	--	--
20	Open Space	Open Space	--	7.0	7.0	--	--	--
21	Open Space	Open Space	--	4.4	4.4	--	--	--
22	Open Space	Open Space	--	1.3	1.3	--	--	--
--	Circulation	Circulation	--	24.1	38.6	--	--	--
Specific Plan Totals:				**229.2**	**229.2**	**4,485*** **	**15,473*** **	**139,700**

* Target density is based on net acreage.
** Net acreage reflects public roadway dedications.
*** Dwelling units within Planning Area 14 only would be constructed in the event that this planning area is not needed as a school site. In the event Planning Area 14 is developed with residential units, the total number of dwelling units allowed within the CENTRAL VILLAGE would increase to 4,682 dwelling units and population would increase to 16,153 persons.

- School/Recreation: Provides a public school site with public recreation areas on 13.1 acres. It should be noted that recreation areas may or may not be available for public use, as public use of this facility is subject to approval by the San Ysidro School District.

The Land Use Element also establishes a set of Design Standards to supplement the policies and recommendations of the OMCPU with site-specific requirements applicable only to the Central Village.

- **Mobility Element.** The Mobility Element of the CVSP establishes the circulation system for the CVSP area. The circulation system includes a hierarchy of roads that provide safe and efficient access throughout the CVSP. The design and origination of the primary roadway network provides the structure for grid pattern street systems within the individual planning areas. In addition, the CVSP includes a comprehensive, interconnected non-vehicular mobility system that connects residents and visitors to homes, retail establishments, parks, trails, and the school.

- **Parks and Open Space Element.** The Parks and Open Space Element of the CVSP provides design standards and policies for the planned parks and open space system, which was designed to provide residents with convenient access to a variety of outdoor recreation and social activities in community gathering areas.

- **Urban Design Element.** The Urban Design Element of the CVSP provides design standards and policies for urban design elements including design principles, architectural design, and landscape design to ensure that implementing development projects are consistent with the design goals of the CVSP. The CVSP contains the following design principles: 1. Activity Nodes and Gateways; 2. Open Space Connections and View Corridors; 3. Gathering Spaces and Interior Courts; 4. Clear and Interconnected Circulation; 5. Parking Internal to Block; 6. Landscape Buffers as Screening; and 7. Positive Frontage and Connection Land Use Interfaces.

- **Infrastructure Element.** The Infrastructure Element of the CVSP includes water, sewer, and storm water drainage systems. The CVSP's conceptual improvement plans ensure that these systems operate efficiently and provide adequate service levels to meet future demand.

- **Implementation Section.** The Implementation Chapter of the CVSP establishes the allowable uses and development standards for the Central Village. The Implementation Chapter also establishes administrative procedures for the following: requirements for implementing development permits; requirements for transfer of dwelling units or commercial square footage between planning areas; definition of minor modifications; requirements for formal amendments; maintenance entities for the various project elements; requirements for phasing; and park development phasing.

Rezone

Under existing conditions, the 229.2-acre Central Village is zoned "Agricultural – Residential, 10-acre minimum lot size (AR-1-1)" with small portions of the site zoned "Open Space – Conservation (OC-1-1). The Project proposes a Rezone to change the zoning designations applied to the Central Village area to the RM-2-5, RM-3-7, CC-3-6, and OR-1-2 zones. The zoning regulations in Chapter 13, Article 1 of the City's Land Development Code apply except as altered by the use and development regulations of the Specific Plan as described below.

- Planning District 1 is the Moderate to High Density Mixed Use District (MH Mixed Use), which accommodates a mixture of commercial and residential uses integrated either horizontally or vertically and encompasses Planning Areas 2, 3, 4, 9, and 10. The base zone is "Community Commercial (CC-3-6)," which is intended to accommodate development with a high intensity, pedestrian orientation and permits a maximum density of 1 dwelling unit for each 1,000 square feet of lot area. Supplemental Use Regulations for Planning District 1 are presented in Table 2, while Supplemental Development Regulations are presented in Table 3.

- Planning District 2 is the Moderate to High Multi-Family District (MH Multi-Family), which accommodates multi-family neighborhoods planned near mixed use areas at the western and eastern entrances of the Central Village, and encompasses Planning Areas 1 and 13. The base zone is "Residential – Multiple Unit (RM-3-7)," which permits a maximum density of 1 dwelling unit for each 1,000 square feet of lot area. Supplemental Use Regulations for Planning District 2 are presented in Table 2, while Supplemental Development Regulations are presented in Table 3.

- Planning District 3 includes Low Density (LD) and Medium Density (MD) Multi-Family Zones, which allow for the development of small lot town homes and row homes. Planning District 3 encompasses Planning Areas 5, 6, 7, 8, 12, and 14. The base zone is "Residential – Multiple Unit (RM-3-7)," which permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area. Supplemental Use Regulations for Planning District 3 are presented in Table 2, while Supplemental Development Regulations are presented in Table 3.

- Planning District 4 is the Parks District for population-based parks, and encompasses Planning Areas 15, 16, 17, and 18. These parks are neighborhood-serving parks, which may include picnic areas, children's play areas, multi-purpose courts and turf areas, paths and walkways, landscaping, and plazas. These parks may also include public art. The existing base zone is "Agricultural-Residential (AR-1-1)." These park lands shall be rezoned "Open Space-Park (OP-1-1)" at the time the public parks are developed as required by the Specific Plan. Supplemental Use Regulations for Planning District 4 are presented in Table 2, while Supplemental Development Regulations are presented in Table 3.

- Planning District 5 is the Open Space District for open space uses. Open Space areas for natural habitat preservation occur in the same locations and configurations as called for by the Otay Mesa Community Plan. Planning District 5 encompasses Planning Areas 19, 20, 21, and 22. The base zone is "Open Space – Residential (OR-1-2)," which allows open space with limited private residential development and to implement the Multi-Habitat Planning Area (MHPA). Supplemental Use Regulations for Planning District 5 are presented in Table 2, while Supplemental Development Regulations are presented in Table 3. The OR-1-2 Base Zone was selected for these Planning Areas for its compatibility with the MHPA.

The proposed Project would provide for five separate zoning designations as set forth in the CVSP, which are referred to as "Planning Districts," as shown on Figure 6, *Planning Districts Map*. As shown in Table 2, *Central Village Specific Plan Supplemental Use Regulations*, and Table 3, *Central Village Supplemental Development Regulations*, each Planning District is associated with a base zone, as described above.

Summary of Required Discretionary and Ministerial Approvals

Subsequent to approval of the proposed Project described herein, additional discretionary and/or administrative actions would be required to implement the proposed Project. ~~Table 4, *Anticipated Discretionary and Administrative Actions*, lists the government agencies that are expected to issue permits and approvals in order to build out the CVSP area~~. The analysis in this document covers all federal, state, local government, and quasi-government approvals which may be needed to implement the Project, whether or not they are explicitly listed in Table 4 or elsewhere in this document (CEQA Guidelines § 15124(d)).

II. ENVIRONMENTAL SETTING

The environmental setting of the Central Village site is substantially the same as described in the OMCPU Final EIR. Figure 4, *Aerial Photograph*, depicts the existing conditions of the 229.2-acre Central Village site. Based on historical aerial photographs, large portions of the site have been used for agricultural production since at least the early 1990s (Google Earth, 2015). The majority of the subject property, particularly in the northern portions of the site (west of Cactus Road), is used for crop production (oats). Along Cactus Road in the southern portions of the property are greenhouses and goat husbandry operations. Along the southern, western, and northwestern boundaries of the site are of open space areas and natural drainages that feed into Spring Canyon. In the northeast portion of the site, east of Cactus Road, the property is periodically disced for fire and weed abatement purposes. Under existing conditions, and consistent with the conditions that existed at the time the OMCPU was adopted in 2014, Cactus Road is

Table 2 Central Village Specific Plan Supplemental Use Regulations

Use Categories/ Subcategories	Planning District 1	Planning District 2	Planning District 3	Planning District 4	Planning District 5
Base Zone (LDC Section Reference)	**CC-3-6 (Ch.13, Art.1, Div. 5)**	**RM-3-7 (Ch.13, Art.1, Div. 4)**	**RM-2-5 (Ch.13, Art.1, Div. 4)**	**OP-1-1 (Ch.13, Art.1, Div. 2)**	**OR-1-2 (Ch.13, Art.1, Div. 2)**
LEGEND: P = Permitted by Right; C = Conditional Use Permit Required; -- = Use Not Permitted; L = Limited Use; N = Neighborhood Use Permit Required. Note: Text shown below in ***bold and italicized*** fonts represents a modification to the Use Regulations for the Base Zone; text not shown in ***bold and italics*** reflect the Use Regulations for the underlying Base Zone (no modifications). Additionally, for any land uses that are identified in the underlying Base Zone but are not referenced below, the Use Regulations of the underlying Base Zone shall apply.					
OPEN SPACE					
Active Recreation	***P***	P	P	P	--
Passive Recreation	***P***	P	P	P	P[1]
Natural Resources Preservation	***P***	P	P	P	P
AGRICULTURE					
Aquaculture Facilities	--	--	--	--	**--**
Raising & Harvesting Crops	--	--	--	--	**--**
Raising, Maintaining, & Keeping of Animals	--	--	--	--	**--**
SEPARATELY REGULATED AGRICULTURE USES					
Commercial Stables	--	--	--	--	**--**
Community Gardens	L[2]	L[2]	L[2]	***L[2]***	**--**
Open Air Markets for the Sale of Agriculture-Related Products & Flowers	--	--	--	--	**--**
RESIDENTIAL					
Single Dwelling Units	***L[3]***	***L[3]***	***L[3]***	**--**	**--**
SEPARATELY REGULATED RESIDENTIAL USES					
Boarder & Lodger Accommodations	L	L	L	--	**--**
Companion Units	--	L	L	--	**--**
Garage, Yard, & Estate Sales	***L***	L	L	--	**--**
Guest Quarters	--	--	--	--	**--**
Home Occupations	L	L	L	--	**--**
Live/Work Quarters	***P***	--	--	--	**--**
Residential Care Facilities:					
6 of Fewer Persons	P	P	P	--	**--**
7 or More Persons	C	C	C	--	**--**
Transitional Housing:					
6 of Fewer Persons	P	P	P	--	**--**
7 or More Persons	C	C	C	--	**--**
SEPARATELY REGULATED INSTITUTIONAL USES					
Educational Facilities:					
Kindergarten through Grade 12	***P***	***P***	***P***	--	--
Vocational/Trade School	***C***	--	--	--	--
Electric Vehicle Charging Stations	L	L	L	L	**--**
Flood Control Facilities	L	L	L	***L***	--

Table 2 Central Village Specific Plan Supplemental Use Regulations (Cont'd)

Use Categories/ Subcategories	Planning District 1	Planning District 2	Planning District 3	Planning District 4	Planning District 5
Base Zone (LDC Section Reference)	**CC-3-6 (Ch.13, Art.1, Div. 5)**	**RM-3-7 (Ch.13, Art.1, Div. 4)**	**RM-2-5 (Ch.13, Art.1, Div. 4)**	**OP-1-1 (Ch.13, Art.1, Div. 2)**	**OR-1-2 (Ch.13, Art.1, Div. 2)**
LEGEND: P = Permitted by Right; C = Conditional Use Permit Required; -- = Use Not Permitted; L = Limited Use; N = Neighborhood Use Permit Required. Note: Text shown below in ***bold and italicized*** fonts represents a modification to the Use Regulations for the Base Zone; text not shown in ***bold and italics*** reflect the Use Regulations for the underlying Base Zone (no modifications). Additionally, for any land uses that are identified in the underlying Base Zone but are not referenced below, the Use Regulations of the underlying Base Zone shall apply.					
Satellite Antennas	L	L	L	L	--
Solar Energy Systems	L	L	L	L	--
SEPARATELY REGULATED RETAIL SALES USES					
Farmers' Markets:					
Weekly Farmers' Markets	L	***L[4]***	--	***L[4]***	--
COMMERCIAL SERVICES					
Animal Grooming & Veterinary Offices	***P***	--	--	--	--
Assembly & Entertainment	***P***	--	--	--	--
With Live Entertainment	***N***	--	--	--	--
With Outdoor Use Area	***N***	--	--	--	--
Artist's Studios	***P***	--	--	--	--
Building Services	***P***	--	--	--	--
Outdoor Activities	***N***	--	--	--	--
SEPARATELY REGULATED COMMERCIAL SERVICES USES					
Bed & Breakfast Establishments:					
1-2 Guest Rooms	P	L	L	--	--
3-5 Guest Rooms	P	L	N	--	--
6+ Guest Rooms	P	N	N	--	--
Child Care Facilities:					
Large Family Child Care Homes	L	L	L	--	--
Small Family Child Care Homes	L	L	L	--	--
Golf Courses, Driving Ranges, and Pitch & Putt Courses	C	C	C	C	--
SEPARATELY REGULATED OFFICE USES					
Real Estate Sales Offices & Model Homes	***P***	***P***	***P***	--	--
SEPARATELY REGULATED WHOLESALE, DISTRIBUTION, AND STORAGE USES					
Temporary Construction Storage Yards	***N***	N	N	***N***	--
SEPARATELY REGULATED INDUSTRIAL USES					
Mining and Extractive Industries	C	--	--	--	--
SEPARATELY REGULATED SIGN USES					
Neighborhood Identification Signs	***N***	N	N	--	--
Reallocation of Sign Area Allowance	***N***	--	--	--	--

Footnotes for Table 2:

1. The Director of the Development Services Department or his/her designee will determine if a particular use is appropriate as a passive use in conformance with an approved development plan, park plan, or other plans applicable to the property.
2. Land Development Code Section 141.0203 shall apply, except that on-site sales are not permitted. Community gardens within public parks ~~only~~ shall be allowed if recommended through the City's public park development process.
3. Development of a small lot subdivision is permitted in accordance with Land Development Code Section 143.0365. For purposes of this section, the "base zoning" designations for Planning District 1 shall be CC-3-6, the base zoning designation for Planning District 2 shall be RM-3-7, and the base zoning designation for Planning District 3 shall be RM-2-5.
4. Farmers' markets are allowed in parks within the CENTRAL VILLAGE only if recommended through the City's public park development process.

Table 3 Central Village Supplemental Development Regulations						
	PLANNING DISTRICT:	**1**	**2**	**3**	**4**	**5**
	LAND USE DESIGNATION:	**MH Mixed Use**	**MH Multi-Family**	**LD & MD Multi-Family**	**Park**	**Open Space**
	BASE ZONE:	**CC-3-6**	**RM-3-7**	**RM-2-5**	**OP-1-1**	**OR-1-2**
DEVELOPMENT STANDARDS	**ALLOWABLE DENSITY:**	**15-44 du/ac**	**15-44 du/ac**	**10-29 du/ac**	**--**	**--**
Note: The Development Regulations for the CENTRAL VILLAGE are as established by the underlying Base Zone, except as specifically modified below. Asterisk "*" indicates that the indicated Development Regulations of the OR-1-2 Base Zone shall not apply to open space areas within the CENTRAL VILLAGE. Hyphens "--" indicate no changes to the Development Regulations for the underlying Base Zone; in such cases, the requirements of ~~Municipal~~ Land Development Code Chapter 13, Article 1 shall apply for the relevant Base Zone.						
Site Requirements	Minimum Lot Area	--	--	1,600 s.f.	--	– *
Setback Requirements	Minimum Front Setback	--	--	5 ft.	--	– *
	Minimum Side Setback					
	Side Setback	5 ft.[1]	--	--	--	– *
	Street Side Setback	--	10 ft.[2]	5 ft.[2]	--	– *
	Alley Setback	--	--	2 ft.	--	– *
	Minimum Rear Setback					
	Rear Setback	5 ft.	--	5 ft.	--	– *
	Alley Setback	--	--	2 ft.	--	– *
	Maximum Floor Area Ratio	2.5	2.5	1.5	--	– *
	Maximum Structure Height	75 ft.	75 ft.	45 ft.[3]	--	– *
	Allowable Development Area	--	--	--	--	~~25%~~[4] *
	Ground-Floor Height	[5]	--	--	--	– *
	Storage Requirements	--	--	Applies[6]	--	– *
	Private Exterior Open Space	Applies[7]	Applies[7]	Applies[7]	--	– *
	Common Open Space	25 s.f. per dwelling[8,9]	25 s.f. per dwelling[8,9]	25 s.f. per dwelling[8,9]	--	– *
	Architectural Projections and Encroachments	Applies[10,11]	Applies[10, 11]	Applies[10,11]	--	– *
	Supplemental Requirements	Applies[12,13,14,15,16,17]	Applies[12,13,14,15,17]	Applies[12,13,14,15, 17]	[18]	[19]

Legend: s.f.= square feet; ft. = feet

Table 3 Footnotes:

The footnotes listed herein supersede and replace the footnotes from the City of San Diego ~~Municipal~~ Land Development Code Table 131-05E for Planning District 1 and shall supersede the footnotes in ~~Municipal~~ Land Development Code Table 131-04G for residential Planning Districts 2 and 3, and shall supersede and replace the footnotes from City of San Diego ~~Municipal~~ Land Development Code Table 131-02C for non-residential Planning Districts 4 and 5. Only the footnotes listed herein shall apply to the CENTRAL VILLAGE Planning Districts.

1. Up to 50 percent of the length of the building adjacent to the side yard may abut the side property line, provided that no encroaching element shall exceed 30 feet in length, that encroaching elements are separated by at least 6 feet, and that each dwelling unit has access to either the front or rear of the lot.
2. Up to 50 percent of the building façade length may encroach up to 5 feet into the required street side yard. The encroachment may occur on a floor-by-floor-basis.
3. ~~Municipal~~ Land Development Code Section 131.0444 shall not apply.

~~4. Municipal Land Development Code Section 131.0250(b) shall apply.~~

~~5~~ 4. ~~Municipal~~ Land Development Code Section 131.0548 shall not apply.

~~6~~ 5. Each dwelling unit shall have a fully enclosed, personal storage area that is at least 240 cubic feet with a minimum 7-foot horizontal dimension along one plane. For Planning District 3, the storage area may be accommodated in the garage area and/or in overhead storage within the garage; or in enclosed and lockable closets on balconies/patios.

~~7~~ 6. At least 50 square feet of usable, private, exterior open space abutting each dwelling unit with a minimum dimension of 4 feet. The open space may be located in the required front, side, and rear yards.

~~8~~ 7. Refer to City of San Diego ~~Municipal~~ Land Development Code Section 131.0456 for design requirements for common open space.

~~9~~ 8. The minimum width for common open space between buildings is 20 feet.

~~10~~ 9. For front and rear yards, encroaching elements shall be separated by at least 10 feet. A minimum setback is not required between the encroachment and the property line. City of San Diego ~~Municipal~~ Land Development Code Section 131.0461(c)(4) & (5) for encroachment regulations for garages and non-habitable accessory buildings and projection regulations for dormers shall not apply.

~~11~~ 10. For side yards, encroaching elements shall be separated by at least 10 feet. For front and rear yards, encroaching elements shall be separated by at least 10 feet. A minimum of 3 feet must be provided between the encroachment and the property line. Refer to City of San Diego ~~Municipal~~ Land Development Code Section 131.0461(c)(4) & (5) for encroachment regulations for garages and non-habitable accessory buildings and projection regulations for dormers.

~~12~~ 11. When the ground floor of a building is used for parking and the parking is adjacent to a required yard, the parking area must be screened by a minimum 6-foot-high fence or 6-foot-high landscaping. A pedestrian entry to the building from each street must be provided.

~~13~~ 12. For lots with a width of 50 feet or less and buildings facing a public street, at least 40 percent of the length of the building façade on the ground floor must enclose habitable area (not a garage or parking entrance); for lots greater than 50 feet in width and buildings facing a public street, at least 50 percent of the length of the building façade on the ground floor must enclose habitable area.

~~14~~ 13. Lots located on a designated Green Street (Central Main Street and Park Way) shall provide landscaped strip with trees planted adjacent to the right-of-way, as shown in Figure 2-10.

~~15~~ 14. Where lots are adjacent to open space, setbacks shall include Brush Management Zone 1(See Section 2.5.3.5).

~~16~~ 15. ~~Municipal~~ Land Development Code Section 131.0540 shall not apply.

~~17~~ 16. ~~Municipal~~ Land Development Code Section 131.0446(e) & (f) shall not apply.

~~18~~ 17. Any structure built within a Planning District 4 lot adjacent to open space shall observe a setback to comply with Brush Management zone regulations.

~~19~~ 18. Any structure built within a Planning District 5 lot adjacent to open space shall observe a setback to comply with Brush Management zone regulations.

Table 4

City of San Diego	
City of San Diego Discretionary Approvals	
City of San Diego Planning Commission	Recommend to the City Council whether to adopt this Addendum No. 1(408329) to the OMCPU EIR along with appropriate CEQA findings in accordance with CEQA Guidelines § 15164; Recommend to the City Council to approve, conditionally approve, or deny an Amendment to the 2014 Otay Mesa Community Plan; Recommend to the City Council to approve, conditionally approve, or deny the Central Village Specific Plan; and Recommend to the City Council to approve or deny adoption of a Rezone to implement buildout of the Central Village in accordance with the CVSP.
City of San Diego City Council	Adopt this Addendum No. 1 (408329) to the OMCPU EIR along with appropriate CEQA findings in accordance with CEQA Guidelines § 15164. Approve, conditionally approve, or deny an Amendment to the 2014 Otay Mesa Community Plan; Approve, conditionally approve, or deny the Central Village Specific Plan; and Approve or deny adoption of a Rezone to implement buildout of the Central Village in accordance with the CVSP.; and Consider compliance with the City of San Diego Climate Action Plan.
City of San Diego Subsequent Discretionary Approvals	
City of San Diego Development Services Department (Process 2 Decisions)	Approve, conditionally approve, or deny implementing Neighborhood Development Permits; and Certify/adopt or reject CEQA compliance documents for implementing developments (EIRs, MNDs, and/or EIR/MND Addendums).
City of San Diego Hearing Officer (Process 3 Decisions)	Approve, conditionally approve, or deny implementing subdivision maps; and Certify/adopt or reject CEQA compliance documents for implementing developments (EIRs, MNDs, and/or EIR/MND Addendums).
City of San Diego City Council (Process 5 Decisions)	Approve, conditionally approve, or deny future revisions to the OMCP; Approve, conditionally approve, or deny future amendments to the CVSP; Approve or deny future rezones within the Central Village; Certify/adopt or reject CEQA compliance documents for implementing developments (EIRs, MNDs, and/or EIR/MND Addendums)
City of San Diego Subsequent Ministerial Permits	

Table 4

City of San Diego Development Services Department (Process 1 Decisions)	Issue Grading Permits; Issue Public Right-of-way Permits; Issue Building Permits; Issue Demolition/Removal Permits; Issue Reimbursement Agreements; and Issue Subdivision Improvement Agreements.
Other Agencies Subsequent Approvals and Permits	
San Diego Regional Water Quality Control Board (RWQCB)	Compliance with National Pollutant Discharge Elimination System (NPDES) Permit. Issuance of a Clean Water Act Section 401 Water Quality Certification.
Otay Water District (OWD)	Approval for Connection to OWD Water and Sewer Facilities
San Ysidro School District (SYSD)	Approval of School Plans
San Diego County Regional Airport Authority (SDCRAA), serving as the Airport Land Use Commission (ALUC)	Approval of Airport Land Use Compatibility Plan Consistency Determination for Brown Field

improved as a two-lane roadway with no sidewalks, and the portion of Airway Road east of Cactus Road also is improved as a two-lane facility.

Land uses surrounding the Central Village also are substantially the same as described in the OMCPU Final EIR. Surrounding land uses include a mixture of open space, undeveloped lands, agricultural uses, and light and heavy industrial uses. Specifically, to the west of the Central Village is open space associated with Spring Canyon. To the north of the Project site is open space associated with Spring Canyon, as well as several light industrial developments. To the north of the portion of the site located east of Cactus Road is SR-905, a major east-west thoroughfare that is a part of the state highway system. Land uses to the east consist of a mixture of undeveloped lands, light industrial uses (auto auction), and greenhouses and agricultural uses. To the south of the Central Village is open space, beyond which are several existing light and heavy industrial land uses. The U.S.-Mexico international border is located approximately 0.5 mile south of the Central Village.

III. PROJECT BACKGROUND

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

The Otay Mesa Community Plan (OMCP) was first adopted by the San Diego City Council in 1981, and was intended to guide development of the area through the year 2000. Figure 1, *Regional Map*, depicts the location of the Otay Mesa community in relation to the surrounding region. The OMCP's principal goals included annexing portions of Otay Mesa into the City of San Diego, coordinating development of the Otay Mesa Port of Entry, increasing employment opportunities, creating residential communities, and providing amenities for employees and residents. The Community Plan called for residential and supporting commercial development in western Otay Mesa with industrial development and limited commercial uses in the central and eastern portions of the community surrounding Brown Field. Since that time, Otay Mesa's location just north of the U.S. / Mexico border has allowed portions of the community to develop into a thriving bi-national regional center, with several recent major infrastructure upgrades, such as the establishment of State Route 905. Furthermore, since that time, per the goals of the Otay Mesa Community Plan, portions of Otay Mesa were annexed into the City of San Diego.

In March 2014, the City of San Diego adopted an Update to the Otay Mesa Community Plan (OMCPU) to provide for broad land use themes that seek to establish a bi-national center; provide for economic diversification; enhance and sustain Otay Mesa's industrial capacity; encourage and support international trade; promote the establishment of balanced neighborhoods that integrate a mix of land uses; and identify infrastructure needs. Figure 2, *Otay Mesa Community Plan Update Vision Map*, depicts the OMCPU's vision for the Otay Mesa community. Concurrent with the adoption of the OMCPU, the City also certified a Program Environmental Impact Report (EIR; State Clearinghouse [SCH] No. 2004651076).
The OMCPU establishes five distinct Districts that pertain to specific geographic areas within the Otay Mesa community. The Central District, in which the 229.2-acre Central Village is located (also referred to as the "Project site" herein), is described by the OMCPU as having a village center at the western end of the mesa (i.e., the "Central Village" area) that is predominately residential in nature with core areas of mixed uses and public spaces sited along Airway Road. OMCPU Subsection 2.1, Specific Plan Areas, requires the adoption of a specific plan (the "Central Village Specific Plan (CVSP)") to provide for the systematic implementation of the CVSP area in accordance with the vision, goals, and policies of the OMCPU for the Central Village area. The OMCPU also requires adoption of a Community Plan Amendment (CPA) concurrent with the CVSP in order to ensure consistency between the OMCPU and the Specific Plan document.

Figure 3, *Vicinity Map*, depicts the location of the Central Village in relation to the Central District and surrounding areas. As shown, the Central Village is located east and west of Cactus Road, and north and south of Airway Road. State Route (SR) 905 abuts the Central Village to the north, while Siempre Viva, an east to west oriented roadway, terminates at Cactus Road at the southeastern boundary of the Central Village area.

IV. DETERMINATION

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

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

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

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

V. IMPACT ANALYSIS

This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the Project are consistent with or less than the impacts disclosed in the previously certified OMCPU EIR. The following includes the environmental issues analyzed in detail in the OMCPU EIR as well as the Project–specific analysis pursuant to the CEQA. The analysis in this document evaluates the adequacy of the OMCPU EIR relative to the Project. The following analysis documents that the proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the 2014 OMCPU EIR.

The significance thresholds used for analysis in this Addendum are the same set of significance thresholds that were used by the City to evaluate impacts within the OMCPU EIR, with the exception of the significance thresholds for the issue area of Greenhouse Gasses, which is explained separately below. This Addendum includes the following subsequent impact analysis to demonstrate that environmental impacts associated with the Project are consistent with or less than the impacts identified in the previously certified OMCPU EIR; thus, the same thresholds were utilized for the impact analysis herein. It should be noted that the significance thresholds used by the certified OMCPU EIR (and utilized in this Addendum) include modifications to the City's CEQA significance thresholds checklist, and were tailored to reflect the environmental conditions of the OMCPU area and pertinent environmental issues that were applicable to the OMCPU in order to provide a more focused scope of environmental analysis. The OMCPU EIR was certified in 2014 with the modified set of significance thresholds. Thus, it is appropriate and necessary for this Addendum to apply the same significance thresholds used by the certified OMCPU EIR for analysis herein.

LAND USE

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project involves applications for a Community Plan Amendment, Specific Plan, and Rezone. OMCPU Subsection 2.1 and Policy 2.1-1 require the establishment of a Specific Plan encompassing the 229.2-acre Central Village. Prior to the adoption of a Specific Plan, the OMCPU explicitly requires the adoption of an Amendment to the OMCP (CPA). Accordingly, an amendment to the OMCP is proposed as part of the Project to revise the OMCP text and exhibits as necessary to ensure consistency between the Specific Plan and the OMCP. The proposed CVSP implements the City's General Plan, the City's Climate Action Plan (CAP), and the OMCPU, which are policy documents with applicability to the geographic area of the Central Village. The Central Village Specific Plan will be adopted by ordinance and all future implementing development projects within the CVSP area would be required to comply with the Specific Plan. There are no components of the proposed CVSP that would obviate the need for future implementing developments within the Central Village to demonstrate compliance with the General Plan, CAP, OMCPU, and CVSP. Moreover, because the CVSP is consistent with the General Plan and OMCPU, and because the OMCPU EIR found that the OMCPU was consistent with the General Plan and other applicable policies and regulations, the CVSP is thus inherently consistent with applicable land use plans, policies, and regulations, including but not limited to the General Plan and OMCPU. Accordingly, the Project would not conflict with the land use plans, policies, and regulations of the City's General Plan and OMCPU; Land Development Code ~~and Otay Mesa Development District (OMDD)~~; Brown Field Airport Land Use Compatibility Plan; and/or the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan. Furthermore, he proposed CVSP would be consistent with the City's CAP, which is applicable to the CVSP area. Please refer to the discussion of thresholds under the Greenhouse Gas Emissions Subsection of this document for a more detailed analysis of the proposed CVSP's consistency with the City of San Diego CAP. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated with a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Thus, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the collocation of residential and industrial land uses and/or conversion of industrial to residential land uses, proposed as part of the CVSP, create land use incompatibilities or result in physical changes as a result of precluding achievement of regional economic development objectives/policies for industrial development?

OMCPU EIR

The OMCPU EIR found that the OMCPU's land use plan would locate residential land uses in close proximity to industrial uses, which would result in potential impacts associated with the collocation of incompatible land uses. However, the OMCPU EIR identified OMCPU policies and performance standards that would avoid and/or reduce potential impacts associated with the collocation of incompatible land uses. In addition, the OMCPU EIR found that implementation of the OMCPU would convert industrial and agricultural lands to residential land uses, which would increase the potential for exposure of sensitive receptors to hazardous materials. However, the OMCPU EIR found that implementation of Mitigation Framework HAZ-3 identified in Section 5.6 of the OMCPU EIR would reduce

potential impacts resulting from the change in land use designations. As such, the OMCPU EIR concluded that assuming compliance with applicable OMCPU and General Plan policies and implementation of mitigation framework HAZ-3 identified in OMCPU EIR Section 5.6, impacts resulting from the collocation of incompatible land uses and the conversion of land uses would be reduced to below a level of significance.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project's land use plan would locate residential land uses in close proximity to off-site industrial uses to the east and southeast; however ~~development~~ design standards and policies set forth in the Specific Plan require landscape buffers to be provided between residential and off-site industrial land uses. In addition, residential land uses would be physically separated by industrial uses to the east of the Project site by Cactus Road. Furthermore, development projects that implement the CVSP would be required to comply with CVSP policies and design standards intended to avoid and reduce potential impacts resulting from the collocation of on-site residential land uses with off-site industrial land uses. The proposed Project does not propose the collocation of incompatible land uses. The following policy is incorporated into the proposed CVSP to address collocation of on-site residential and off-site industrial uses.

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

- Provide landscape screening and/or patio walls to reduce noise impacts and protect the privacy of residential units along high traffic streets and intense uses.
- Address noise through the use of berms, planting, setbacks, and architectural design rather than with conventional wall barriers for generating uses.
- Minimize the number of residential units that have window and door openings that afford views into adjacent industrial uses located east of the Central Village. Whenever possible, orient the short end of buildings towards industrial uses.

In addition, Mitigation Framework HAZ-3 identified in Section 5.6 of the OMCPU EIR would be applicable to implementing development projects to address any on-site hazards conditions that may be present in the site's soils associated with the property's past and current agricultural uses. Consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated with the collocation of residential and industrial land uses. The Project does not propose the conversion of industrial to residential land uses, and the potential hazards associated with the conversion of agricultural to CVSP uses is addressed by Mitigation Framework HAZ-3. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact associated with the collocation of residential and industrial uses, or with the conversion of agricultural lands to a residential community, as previously analyzed in the OMCPU EIR.

Would the CVSP result in a conflict with the purpose and intent of the ESL Regulations, the Historical Resources Regulations, and the Brush Management Regulations of the LDC?

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU would not conflict with the intent and purpose of the Brush Management regulations of the LDC; however, the OMCPU EIR found that the OMCPU would have the potential to conflict with the intent and purpose of the Environmentally Sensitive Lands (ESL) regulations and the Historical Resources regulations. The OMCPU EIR concluded that with implementation of Mitigation Frameworks LU-1a and LU-1b, generally requiring development proposals to be consistent with the OMCPU, base zone regulations and CPIOZ Type A supplemental regulations, and demonstrate that there are no biological or archeological resources present on the Project site or be subject to discretionary review, potentially significant impacts to regulatory compliance would be reduced to below a level of significance.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project is located within and adjacent to steep hillside areas, which are considered "environmentally sensitive lands" (ESL); however, there are no components of the Project that would conflict with the ESL, although future development projects that implement the CVSP would undergo site-specific discretionary review and would be required to demonstrate compliance with ESL regulations. There are no known historical structures that occur within the CVSP area, although future implementing site-specific discretionary actions would be subject to the OMCPU EIR Mitigation FrameworkHIST-1 and HIST-2, which require the preparation of a site-specific archeology study and, if historic resources are present, require the City to determine whether the resource is historically significant per the City's Historical Resources Guidelines prior to the issuance of any permit. In addition, the Project complies with the Brush Management Regulation of the LDC. CVSP Section 2.5.3.5 acknowledges that the San Diego Land Development Code requires that brush management be implemented for buildings that are located within 100 feet of undisturbed vegetation, and all future site-specific discretionary actions would be required to comply with the City's Land Development Code brush management requirements (see San Diego Municipal Code Section 142.0412).

Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact due to a conflict with the purpose and intent of the ESL regulations, the Historical Resources regulations, and the Brush Management regulations of the LDC. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP result in a conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan and the MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Implementation of the proposed Project would result in development on the site that is substantially consistent with the OMCPU. No adjustments to the MHPA boundary are proposed as part of the CVSP project. The CVSP would maintain the on-site MHPA-designated areas as open space, with the exception of one area where the OMCPU calls for Airway Road to traverse the MHPA. Pursuant to the MSCP, Mobility Element facilities are allowed to traverse MHPA areas.

Portions of the Project site are located adjacent to the MHPA boundary and future site-specific discretionary actions would be required to comply with the MSCP in accordance with the OMCPU EIR's Mitigation Framework LU-2, requiring MHPA adjacency impacts to be addressed at the project-level. Applicants for future development within the CVSP area would be required to conduct site-specific biological resources surveys in order to determine impacts,

if any, to the MSCP. Additionally, although Airway Road would traverse a portion of the City's MHPA, Airway Road is a Mobility Element-designated facility and was planned to traverse MHPA areas by the OMCPU. Pursuant to the MSCP, Mobility Element facilities are allowed to traverse MHPA areas subject to a MHPA boundary adjustment (City of San Diego, 1997, p. 44). The impacts that would be caused by the Project are within the scope of the OMCPU EIR, and all impacts due to conflicts with adopted environmental plans, such as the MSCP and MSCP Subarea Plan's Land Use Adjacency Guidelines will be mitigated to a level below significance. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously disclosed in the OMCPU EIR.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project site affords views of open space areas associated with Spring Canyon, and the OMCPU includes policies requiring that future development projects include focal points and view corridors that afford views to Spring Canyon. As the OMCPU EIR notes, existing informal trails located within open space areas provide public views of the Spring Canyon system, which would be preserved under the OMCPU. The proposed CVSP designates open space areas in the same areas designated as open space by the OMCPU land use plan, with the exception of the one acre adjustment proposed by the CVSP. The 1.0 acre adjustment results from the proposed conversion of less than an acre of land designated by the OMCPU for open space to "Residential – Medium to Medium High." Although designated for open space in the OMCPU, City staff determined that the OMCPU's designation of <1.0 acre are in the west of the CVSP area was based on mapping associated with the OMCPU EIR which showed this area as native vegetation, whereas this area is actually fully disturbed and contains no natural vegetation. Therefore, existing informal trails located within open space areas also would be preserved under the proposed Project and would continue to provide views of the Spring Canyon system. Moreover, the proposed CVSP incorporates a trail and paseo network that would feature overlooks and provide other viewing opportunities of the Spring Canyon open space complex. Thus, and consistent with the finding of the OMCPU EIR, future development projects that would implement the CVSP would not result in a substantial adverse effect on a public viewing area, scenic vista, or open space area. Therefore, impacts to the visual quality of the area, with respect to views from public viewing areas, vista, and open spaces would be less than significant. Implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

The 2014 OMCPU determined that there are no scenic roadways identified within the OMCPU area in either the City's General Plan or the OMCPU (City of San Diego, 2014b, p. 5.2-15). As such, the OMCPU EIR did not identify any impacts to scenic resources within a state scenic highway.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. According to information available from Caltrans, there are no roadways within the Otay Mesa community that are officially designated or eligible for designation as state or county scenic highways. The nearest scenic highway is Interstate 5 (I-5), the nearest segment of which is located approximately 2.3 miles west of the Central Village area. Due to distance and intervening topography and development, future development on the Project site would not be prominently visible along any segment of I-5. (Caltrans, 2011; Google Earth, 2015) Furthermore, and as shown on Figure 4, the Project site does not contain any trees or rock outcroppings. Although there are structures on site that may be older than 45 years, future development proposals within the Central Village would be required to comply with OMCPU EIR Mitigation Framework HIST-2, which requires an analysis of historical significance of any structures proposed to be demolished and a determination as to whether such resources would be significant. Regardless, if any of the on-site structures are determined to be historically significant during the CEQA compliance process required for future implementing actions, none would be prominently visible from I-5 or any other designated or eligible scenic highway. Accordingly, and consistent with the conclusion of the OMCPU EIR, impacts to scenic resources visible from a state scenic highway would not occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, and consistent with conditions that existed at the time the OMCPU EIR was certified in 2014, the Central Village consists of undeveloped parcels, parcels subject to dryland farming (oats), greenhouses, and a goat husbandry operation. Land uses surrounding the Central Village include open space to the northwest, west, and southwest; light industrial uses and SR-905 to the north; light industrial (auto auctions), greenhouses, and agricultural uses to the east; and light and heavy industrial uses to the east and south. (Google Earth, 2015).

The OMCPU EIR anticipated that the Project site and surrounding area would be developed in accordance with the OMCPU Land Use Plan, which designated the property for development with Neighborhood Village (15-25 du/ac), Community Village (30-35 du/ac), institutional (school), parks, and open space land uses (City of San Diego, 2014a,

Figure 2-1).As evaluated in the OMCPU EIR, the Central Village was presumed to consist of ~~5,246~~ 4,768 multi-family dwelling units, 32,700 s.f. of community commercial uses, 23.3 acres of active park uses, an elementary school, and open space. As proposed by the CVSP (see Figure 5), the Central Village would be developed with a maximum of 4,485 multi-family dwelling units, 139,700 s.f. of community commercial uses, 16.1 acres of active parks, an elementary school site, and open space. Regarding visual quality and character, the land uses proposed by the CVSP would appear very similar to the land uses envisioned by the OMCPU. Furthermore, the CVSP includes detailed architectural and landscaping policies and design standards that would help ensure that the Central Village area is developed in a manner that would not degrade the aesthetic character of the Central Village site or its surroundings in terms of bulk, scale, materials, or style. Refer to the CVSP Section 2.5, Urban Design Element, for more information.

In addition, future implementing development proposals within the CVSP area would be required to comply with applicable regulatory requirements that implement General Plan goals and policies. As part of the City's discretionary review process for implementing development projects within the Central Village, the City will review each implementing development application for compliance with the General Plan as well as the policies contained in the OMCPU and CVSP. Specifically, General Plan Policy UD A.5 requires buildings to be designed to "contribute to a positive neighborhood character and relate to neighborhood and community context" (City of San Diego, 2014b, Table 5.2-1). Furthermore, future implementing development proposals are required to comply with the proposed CVSP, which includes policies and design standards addressing Urban Design and adherence to which would prevent future development projects from negatively affecting the visual quality of the area or strongly contrasting with the surrounding development and natural topography. Policies and design standards of the CVSP Urban Design Element address the CVSP's seven design principals, including: 1) Activity Nodes and Gateways; 2) Open Space Connections and View Corridors; 3) Gathering Spaces and Interior Courts; 4) Clear and Interconnected Circulation; 5) Parking Internal to Block; 6) Landscape Buffers as Screening; and 7) Positive Frontage and Connecting Land Use Interfaces. In accordance with OMCPU Policy 4.1-3, which requires Specific Plans to include design guidelines for village areas (City of San Diego, 2014a, p. UD-4), the proposed CVSP contains policies that would require future implementing projects to be compatible with the design theme envisioned for the Project area pursuant to Section 2.5, Urban Design Element, of the Specific Plan. Thus, and consistent with the conclusion reached in the OMCPU EIR, future development anticipated in association with the proposed Project would not result in a severe contrast with the site's aesthetic character surrounding, aesthetic character in terms of bulk, scale, materials and style, or natural topography, and impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP result in a negative visual appearance due to the loss, covering, or modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient?

OMCPU EIR

The OMCPU EIR found that future development would be required to comply with the City's Grading Regulations, General Plan policies, and OMCPU policies. As such, the OMCPU EIR concluded that assuming compliance with these policies, impacts associated with the modification of unique physical features that would create a negative visual appearance would be less than significant.

CENTRAL VILLAGE PROJECT

The proposed Project is located within and adjacent to steep hillside areas, which are considered "environmentally sensitive lands" (ESL). OMCPU Policies 8.1-1 through 8.1-3, require new development to comply with ESL regulations, preserve a network of canyons and adjacent mesa tops, and minimize grading to relate to the area's natural topography (San Diego, 2014a, p. CE-9). Future grading associated with implementation of the proposed Project would involve grading and modification to steep hillsides (slopes with gradients that exceed 25 percent), principally contained within the Spring Canyon system. Although there are no components of the Project that would conflict with the City's ESL Ordinance, future development projects that implement the CVSP would undergo site-specific discretionary review and would be required to demonstrate compliance with ESL regulations and the City's

Grading Regulations. Like the OMCPU, the proposed Project would not authorize any grading, construction or associated hillside modifications. Further, the CVSP would not result in any hillside modifications that were not previously contemplated by the OMCPU. As such, and consistent with the finding of the OMCPU EIR, impacts would be less than significant. Implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

AIR QUALITY/ODOR

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The San Diego Air Pollution Control District (SDAPCD) is the government agency that regulates sources of air pollution within San Diego County and developed a Regional Air Quality Strategy (RAQS) to provide control measures designed to achieve attainment status. The RAQS serves as the Air Quality Management Plan (AQMP) for the San Diego Air Basin (SDAB) in which the OMCPU area is located. As was the case when the OMCPU EIR was certified in 2014, San Diego is in "non-attainment" status for federal and State ozone (O3) standards and the State PM10 and PM2.5 standards; however, an attainment plan is only available for O3. The RAQS was adopted in 1992 and has been updated as recently as 2009 which was the latest update incorporating minor changes to the prior 2004 update. The 2009 RAQS update mostly clarified and enhanced emission reductions by implementing new volatile organic compounds (VOC) and oxides of nitrogen (NOx) reduction measures. The criteria pollutant standards are generally attained when each monitor within the region has had no exceedances during the previous three calendar years. (Ldn, 2017a, p. 10)

The SDAPCD has established thresholds in Rule 20.2 for new or modified stationary sources of criteria air pollutants. These requirements include screening level thresholds for Air Quality Impact Assessments (AQIA) and for determining the significance of air quality impacts under CEQA. These screening criteria can be used to demonstrate whether a project's total emissions would result in a significant impact as defined by CEQA. Should emissions be found to exceed these thresholds, additional modeling is required to determine if the Project's total air quality impacts are below the state and federal ambient air quality standards. Table 5, *Screening Thresholds for Criteria Pollutants*, details the daily screening thresholds for construction and operations for projects within the SDAPCD. (Ldn, 2017a, p. 14)

The RAQS is largely based on population predictions by the San Diego Association of Governments (SANDAG). Projects that produce less growth than predicted by SANDAG would generally conform to the RAQS and projects that create more growth than projected by SANDAG may create a significant impact especially if the project

Table 5 Screening Thresholds for Criteria Pollutants

Pollutant	Total Emissions (Pounds per Day)
Construction Emissions	
Respirable Particulate Matter (PM_{10} and $PM_{2.5}$)	100 and 55
Nitrogen Oxide (NO_x)	250
Sulfur Oxide (SO_X)	250
Carbon Monoxide (CO)	550
Volatile Organic Compounds (VOCs)	75
Reactive Organic Gases (ROG) SCAQMD	75
Operational Emissions	
Respirable Particulate Matter (PM_{10} and $PM_{2.5}$)	100 and 55
Nitrogen Oxide (NO_x)	250
Sulfur Oxide (SO_X)	250
Carbon Monoxide (CO)	550
Lead and Lead Compounds	3.2
Volatile Organic Compounds (VOCs)	75
Reactive Organic Gases (ROG) SCAQMD	75

(Ldn, 2017a, Table 2.3)

produces unmitigable emission generation in excess of the screening thresholds identified in Table 5. Also, an individual project would be considered to have a cumulatively considerable impact if the project results in emissions that exceed the screening thresholds shown in Table 5 after the implementation of all feasible mitigation measures. (Ldn, 2017a, p. 12)

The analysis presented in the OMCPU EIR as well as Appendix C to the OMCPU EIR assumed that the Central Village area would be developed with the following land uses:

- ~~5,246~~ 4,768 multi-family dwelling units;
- 32,700 s.f. of community commercial floor space;
- ~~32.3~~ 18.16 acres of active park space; and
- 1 elementary school.

The CVSP, which proposes to refine and implement the OMCPU for the Central Village area, limits development within the Central Village to a maximum of 4,485 multi-family dwelling units, 139,700 s.f. of community commercial floor space, 16.1 acres of active park space, and an elementary school site. As a result, and in comparison to the land uses assumed for the site by the OMCPU EIR, implementation of the proposed Project would result in:

- A reduction of ~~761~~ 283 multi-family dwelling units;
- An increase of 107,000 s.f. of community commercial space; and
- A reduction[1] of ~~16.2~~ 2.06 acres of active park space.

Because the size of the development area assumed by the OMCPU EIR for Central Village and by the CVSP are substantially similar, it is assumed that construction activities associated with buildout of the Central Village would largely remain the same as assumed by the OMCPU EIR in the Central Village area. The OMPCU EIR's analysis of construction activity assumed that sources of construction-related air emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. (RECON, 2013). Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions

[1] The reduction in population-based parkland is due to the reduction in residential dwelling units, resulting in fewer future residents and a corresponding decrease in parkland demand.

in the Central Village. Thus, the CVSP would not result in an increase of construction emissions as compared to what was assumed in the OMCPU EIR. For this reason, detailed construction-related air quality modeling is not required, because the results for the Central Village would be identical to those reported in the OMCPU EIR. Because daily and total construction-related air emissions associated with the CVSP would not increase in relation to what was evaluated and disclosed in the OMCPU EIR, no new or more severe construction-related air quality impacts would result. However, and consistent with the conclusion reached in the OMCPU EIR, if several development projects either within the CVSP or larger OMCPU were to occur simultaneously, there is the potential for multiple projects to exceed significance thresholds on a cumulatively-considerable basis. OMCPU EIR Mitigation Framework AQ-1 would therefore apply to future development within the Central Village, and would reduce construction-related emissions to the maximum feasible extent. While it is not anticipated that construction activities that would implement the CVSP or OMCPU would result in significant air quality impacts, because no development projects are proposed at this time and thus the air emissions from those future developments within the CVSP and OMCPU area cannot be quantified at this time, consistent with the finding of the OMCPU EIR, the construction-level impact due to a conflict with the RAQS would be significant and unavoidable on a cumulatively-considerable basis.

With respect to long-term operating conditions, the OMCPU EIR Section 5.3, Air Quality, concluded that area and mobile emission quantities under the OMCPU would be less for all criteria pollutants than quantities of area and mobile emissions that would have occurred under the community plan that was in place prior to adoption of the 2014 OMCPU. Area and mobile emissions would be further reduced under the proposed CVSP Project because of the proposed decrease in development intensity within the Central Village, as described above. More specifically, the operational characteristics of the proposed CVSP were evaluated in a site-specific technical report entitled, "Air Quality Assessment, Otay Mesa Central Village Specific Plan Update to the Otay Mesa Community Planning Area," dated ~~January 20~~ March 13, 2017, and prepared by Ldn, Consulting Inc. This study is included as *Technical Appendix A*, to this Addendum. The results of the analysis are presented in Table 6, *Summer Operational Emissions (Approved OMCPU vs. Proposed Project*), and Table 7, *Winter Operational Emissions (Approved OMCPU vs. Proposed Project)*. As shown in these tables, implementation of the proposed CVSP would result in a reduction in all criteria pollutants by between ~~8~~ 6% and ~~14~~ 15% as compared to the land uses that were assumed for the Central Village by the OMCPU EIR. The reduction is primarily due to the reduction in traffic that would be generated by the CVSP in compared to the amount of traffic assumed to be generated by the Central Village by the OMCPU EIR. According to the CVSP's Transportation Facilities Trigger Analysis (Chen Ryan & Associates, 2017), the CVSP is calculated to generate 36,345 external average daily vehicular trips (ADT), which is less traffic than was assumed for the Central Village by the OMCPU EIR, at ~~45,429~~ 41,109 external ADT.

Although the proposed Project would result in an ~~8~~ 6% - ~~14~~ 15% reduction in criteria area pollutants associated with the operation of land uses in the Central Village, comparing the data presented in Table 6 and Table 7 with the SDAPCD thresholds presented in Table 5 demonstrates that operational emissions associated with buildout of the CVSP and the larger OMCPU would exceed the SDAPCD's thresholds for ROGs, NOx, CO, PM10, and PM2.5. Accordingly, while impacts would be reduced as compared to what was disclosed by the OMCPU EIR, impacts due to a conflict with the RAQS would nonetheless remain significant and unavoidable with buildout of the OMCPU and CVSP. This conclusion is consistent with the conclusion reached by the OMCPU EIR. OMCPU EIR Mitigation Framework AQ-2 was identified to reduce impacts from air quality or potential health effects to sensitive receptors to the maximum feasible extent; however, at the program level there is no feasible mitigation that would reduce this impact to below a level of significance.

Although the Project's near- and long-term emissions have the potential to violate the RAQS, the analysis presented above demonstrates that implementation of the proposed Project would not result in any greater inconsistency with the RAQS than what was evaluated and disclosed by the OMCPU EIR. In fact, the Project would generate a lesser quantity of air pollutant emissions, thereby increasing consistency with the RAQS. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Table 6 Summer Operational Emissions (Approved OMCPU vs. Proposed Project)

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summer Existing Approved OMCPU Central Village Land Use Scenario						
Area (Lb/Day)	~~8,239.99~~ 7,476.23	~~113.95~~ 103.57	~~10,324.53~~ 9,383.80	~~3.89~~ 3.53	~~1,391.90~~ 1,265.07	~~1,391.86~~ 1,265.04
Energy (Lb/Day)	~~0.87~~ 0.79	~~7.41~~ 6.75	~~3.21~~ 2.93	~~0.05~~ 0.04	~~0.60~~ 0.54	~~0.60~~ 0.54
Mobile (Lb/Day)	~~140.76~~ 122.06	~~287.62~~ 249.21	~~1,400.62~~ 1,213.75	~~4.09~~ 3.54	~~280.09~~ 242.63	~~77.71~~ 67.32
Total (Lb/Day)	~~8,381.61~~ 7,599.07	~~408.97~~ 359.53	~~11,728.36~~ 10,600.47	~~8.02~~ 7.12	~~1,672.59~~ 1,508.25	~~1,470.17~~ 1,332.90
Summer Proposed CVSP Scenario						
Area (Lb/Day)	7,034.40	97.42	8,826.85	3.32	1,189.99	1,189.95
Energy (Lb/Day)	0.75	6.42	2.82	0.04	0.52	0.52
Mobile (Lb/Day)	~~138.57~~ 104.55	~~273.61~~ 203.61	~~1,339.27~~ 998.73	~~3.85~~ 2.85	~~263.14~~ 194.80	~~73.02~~ 54.06
Total (Lb/Day)	~~7,173.72~~ 7,139.70	~~377.44~~ 307.44	~~10,168.94~~ 9,828.40	~~7.21~~ 6.21	~~1,453.64~~ 1,385.30	~~1,263.49~~ 1,244.54
Difference						
Area (Lb/Day)	~~-1,205.59~~ -441.83	~~-16.53~~ -6.15	~~-1,497.68~~ -556.95	~~-0.56~~ -0.21	~~-201.91~~ -75.09	~~-201.91~~ -75.09
Energy (Lb/Day)	~~-0.12~~ -0.04	~~-0.99~~ -0.33	~~-0.39~~ -0.11	~~-0.01~~ 0.00	~~-0.08~~ -0.03	~~-0.08~~ -0.03
Mobile (Lb/Day)	~~-2.19~~ -17.51	~~-14.01~~ -45.61	~~-61.35~~ -215.01	~~-0.24~~ -0.69	~~-16.96~~ -47.83	~~-4.69~~ -13.25
Total (Lb/Day)	~~-1,207.89~~ -459.38	~~-31.53~~ -52.08	~~-1,559.42~~ -772.07	~~-0.81~~ -0.90	~~-218.95~~ -122.94	~~-206.67~~ -88.36
Percentage Reduction in Emissions	**~~-14%~~ -6%**	**~~-8%~~ -14%**	**~~-13%~~ -7%**	**~~-10%~~ -13%**	**~~-13%~~ -8%**	**~~-14%~~ -7%**
Daily pollutant generation assumes trip distances within CalEEMod						

(Ldn, 2017a, Table 4.1)

Table 7 Winter Operational Emissions (Approved OMCPU vs. Proposed Project)

	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Winter Existing Approved OMCPU Central Village Land Use Scenario						
Area (Lb/Day)	~~8,239.99~~ 7,476.23	~~113.95~~ 103.57	~~10,324.53~~ 9,383.80	~~3.89~~ 3.53	~~1,391.90~~ 1,265.07	~~1,391.86~~ 1,265.04
Energy (Lb/Day)	~~0.87~~ 0.79	~~7.41~~ 6.75	~~3.21~~ 2.93	~~0.05~~ 0.04	~~0.60~~ 0.54	~~0.60~~ 0.54
Mobile (Lb/Day)	~~140.76~~ 129.37	~~287.62~~ 264.91	~~1,400.62~~ 1,276.76	~~4.09~~ 3.37	~~280.09~~ 242.64	~~77.71~~ 67.33
Total (Lb/Day)	~~8,381.61~~ 7,606.38	~~408.97~~ 375.22	~~11,728.36~~ 10,663.48	~~8.02~~ 6.94	~~1,672.59~~ 1,508.26	~~1,470.17~~ 1,332.91
Winter Proposed CVSP Scenario						
Area (Lb/Day)	7,034.40	97.42	8,826.85	3.32	1,189.99	1,189.95
Energy (Lb/Day)	0.75	6.42	2.82	0.04	0.52	0.52
Mobile (Lb/Day)	~~138.57~~ 111.09	~~273.61~~ 216.34	~~1,339.27~~ 1,060.48	~~3.85~~ 2.71	~~263.14~~ 194.81	~~73.02~~ 54.08
Total (Lb/Day)	~~7,173.72~~ 7,146.24	~~377.44~~ 320.18	~~10,168.94~~ 9.890.14	~~7.21~~ 6.07	~~1,453.64~~ 1,385.32	~~1,263.49~~ 1,244.55
Difference						
Area (Lb/Day)	~~-1,205.59~~ -441.83	~~-16.53~~ -6.15	~~-1,497.68~~ -556.95	~~-0.56~~ -0.21	~~-201.91~~ -75.09	~~-201.91~~ -75.09
Energy (Lb/Day)	~~-0.12~~ -0.04	~~-0.99~~ -0.33	~~-0.39~~ -0.11	~~-0.01~~ 0.00	~~-0.08~~ -0.03	~~-0.08~~ -0.03
Mobile (Lb/Day)	~~-2.19~~ -18.28	~~-14.01~~ -48.57	~~-61.35~~ -216.28	~~-0.24~~ -0.66	~~-16.96~~ -47.83	~~-4.69~~ -13.25
Total (Lb/Day)	~~-1,207.89~~ -460.14	~~-31.53~~ -55.04	~~-1,559.42~~ -773.34	~~-0.81~~ -0.87	~~-218.95~~ -122.94	~~-206.67~~ -88.37
Percentage Reduction in Emissions	**~~-14%~~ -6%**	**~~-8%~~ -15%**	**~~-13%~~ -7%**	**~~-10%~~ -12%**	**~~-13%~~ -8%**	**~~-14%~~ -7%**
Daily pollutant generation assumes trip distances within CalEEMod						

(Ldn, 2017a, Table 4.2)

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

OMCPU EIR

The OMCPU EIR found that emissions resulting from the implementation of the OMCPU would potentially exceed daily SDAPCD emissions thresholds and result in a cumulatively considerable net increase of criteria pollutants during both construction and long-term operation of implementing development projects. Although the analysis of construction impacts demonstrated that construction-level impacts would be less than significant, the OMCPU EIR concluded that impacts would be cumulatively considerable and unavoidable due to the possibility that multiple projects could be under construction simultaneously and could thereby cumulatively exceed the SDAPCD construction-related thresholds (refer to Table 5). Under long-term operating conditions, the OMCPU EIR determined that air quality emissions would be reduced under the OMCPU compared to the previously adopted community plan but also concluded that emissions under the OMCPU still would exceed the SDAPCD operational thresholds (refer to Table 5). Because air emissions from future developments within the OMCPU area could not be adequately quantified at the time the OMCPU EIR was certified due to the fact that the OMCPU is a policy document and development was not proposed, this impact was disclosed as significant and unavoidable. The OMCPU EIR identified Mitigation Frameworks AQ-1 and AQ-2, which require the incorporation of best available control measures and reasonable mitigation to reduce emission levels. The OMCPU EIR concluded that even with implementation of Mitigation Frameworks AQ-1 and AQ-2, impacts due to potential violation of air quality standards, and a potential cumulatively considerable net increase of criteria pollutants for which the region is in non-attainment would be significant and unavoidable. A statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 5.3-22 and 5.3-23)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The SDAPCD had developed localized significance thresholds for regulated pollutants, as summarized previously in Table 5. Any projects in the SDAPCD with daily emissions that exceed any of the indicated thresholds would be considered as having an individually and cumulatively-considerable significant air quality impact. Air quality emissions would occur during both construction and operation of future development projects that would implement the CVSP. Assumptions used by the Project's Air Quality Study (*Technical Appendix A*) for estimating the proposed Project's construction and operational emissions are provided in Subsection 3.0, Methodology, of the *Technical Appendix A*. Provided below are the results of the analysis.

Construction Impacts

Air quality emissions would result from the construction and operation of future development projects that would implement the CVSP. Because the development area (229.2 acres) assumed by the OMCPU EIR and development area (229.2 acres) proposed by the CVSP are substantially similar, it is assumed that construction activities associated with buildout of the Central Village would largely remain the same as assumed by the OMCPU EIR in the Central Village area. The OMCPU EIR's analysis of construction emissions assumed that sources of construction-related air emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. (RECON, 2013). Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions in the Central Village.

Construction operations are subject to the requirements established in Regulation 4, Rules 52 and 54, of the SDAPCD's rules and regulations, which are intended to limit and control fugitive dust emissions. The exact number and timing of future development projects that would occur on the Project site are unknown at this time. However, the OMCPU EIR included a hypothetical analysis of typical construction-related emissions, based on two hypothetical projects. These hypothetical projects included a one-acre multi-family residential project that may be typical in the more developed portions of the OMCPU area, and the development of a large-scale project that would be expected to occur in the undeveloped portions of the OMCPU area. The results of the hypothetical analyses are presented below as Table 8, *Sample Daily Construction Emissions*. The emissions summarized in Table 8 are the

Table 8 Sample Daily Construction Emissions

Pollutant	Small Project	Large Project	Threshold
ROG	76	90	137
NO_X	45	111	250
CO	27	59	550
SO_2	0	0	250
PM_{10}	8	23	100
$PM_{2.5}$	5	15	100[1]

[1]The $PM_{2.5}$ threshold is based on the PM_{10} standard and the methodology presented in the *Final Methodology to Calculate $PM_{2.5}$ and $PM_{2.5}$ Significance Thresholds* (SCAQMD 2006).
NOTE: The total PM emissions indicated in the CalEEMod output files do not equal the sum of the individual source emissions.
(City of San Diego, 2014b, Table 5.3-4)

maximum daily emissions for each pollutant that would occur during any phases of construction as reported in the OMCPU EIR.

As shown in Table 8, emissions of air quality pollutants during construction activities for the "Large Project," which would be similar to the construction activities anticipated within the Central Village, would not exceed the RAQS threshold of significance; therefore, the CVSP's implementing construction activities would not result in a direct or cumulatively-considerable impact. (City of San Diego, 2014b, pp. 5.3-19 and 5.3-20) However, and consistent with the finding reached by the OMCPU EIR, "[w]hile it is not anticipated that construction activities throughout the [OM]CPU area would occur simultaneously, there is no way to determine a precise construction schedule at this program-level or whether construction activities within the [OM]CPU area would occur concurrently with projects in adjacent areas. Because the San Diego Air Basin is in non-attainment for ozone, PM10 and PM2.5, any potential increase in emissions of these criteria pollutants resulting from future development would pose potential cumulatively considerable and significant air quality effects." (City of San Diego, 2014b, p. 6-8) Accordingly, and consistent with the analysis presented in the OMCPU EIR, because it is not possible to determine the precise construction schedule for buildout of the CVSP (proposed Project) because the CVSP is a policy document and no development applications are proposed that would authorize construction, construction-level air quality emissions are conservatively concluded to be cumulatively considerable and unavoidable. OMCPU EIR Mitigation Framework AQ-1 would apply, but would not reduce impacts to less-than-significant levels. This is the same conclusion reached by the OMCPU EIR.

Operational Emissions

The largest changes in air emission quantities associated with the land use changes proposed by the CVSP would be expected during the operational life of the CVSP Project. Air emissions from daily operations would include sources such as Area, Energy, and Mobile. Area Source emissions include emissions from consumer products, landscaping maintenance equipment, and architectural coatings (such as painting) as part of regular maintenance activities in a predominately residential community. Energy sources emissions would be generated from the production and consumption of energy to operate the Central Village community, such as electricity and natural gas. Mobile (or transportation-related) source emissions would occur from motor vehicles (tailpipe emissions) generated by land uses in the Central Village, which are calculated in CalEEMod through the use of EMFAC2011. In the EMFAC model, an emissions inventory is based on the emission rate (e.g., grams per pollutant emitted over a mile) and vehicle activity (e.g., miles driven per day). Area sources originate from daily onsite uses, which require either burning fuel to generate energy (i.e. natural gas fireplaces, gas furnaces, gas water heaters and small engines) or the evaporation of organic gases such as from paints (architectural coatings).

CalEEMod 2013.2.2 and EMFAC2011 represent the most recent model versions available at the time environmental analysis of the CVSP Project commenced. Traffic data for the Central Village relied upon in the modeling efforts were taken from the OMCPU EIR's traffic report (Urban Systems Associates, Inc. 2012) as summarized in the CVSP's Transportation Facilities Trigger Analysis (Chen Ryan & Associates, 2017), and traffic data for buildout of the CVSP as disclosed in the CVSP's Transportation Facilities Trigger Analysis. At full buildout of the Central

Village, the OMCPU EIR assumed the generation of ~~45,429~~ 41,109 daily trips. In comparison, 36,345 daily trips would be generated by land uses in the Central Village under the proposed CVSP. The CalEEMod 2013.2.2 air quality model was run on both scenarios to remain consistent. (The OMCPU EIR used CalEEMod 2011).

Table 6 and Table 7, previously presented, show the seasonal emissions for the Central Village, and show the differences in emissions between the proposed Project and the level of emissions disclosed in the OMCPU EIR for the Central Village. Based on the findings shown previously in Table 6 and Table 7, operational air quality emissions would be reduced with implementation of the proposed Project in comparison to the emissions disclosed for the Central Village by the OMCPU EIR. The proposed Project is calculated to decrease emissions of criteria air pollutants between ~~8~~ 6 and ~~14~~ 15%. (Ldn, 2017a, p. 27) Nonetheless, and consistent with the conclusion reached in the OMCPU EIR, because the CVSP is a policy document and implementing development is not proposed at this time, the quantification of air emissions cannot be adequately quantified at the program level. Thus, it is conservatively concluded that operational impacts of the proposed Project would be significant and mitigation would not reduce these impacts to less-than-significant levels. (City of San Diego, 2014b, pp. 5.3-22 and 5.3-23) For this reason, the applicable mitigation measures presented in the Air Quality Section of the OMCPU EIR would apply to all development projects that implement the CVSP.

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

OMCPU EIR

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

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

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

Potential impacts due to collocation also were evaluated in the OMCPU EIR because the OMCPU would allow residential, commercial, and industrial uses in proximity to one another. Air quality impacts discussed in the OMCPU EIR include DPM emitted by heavy trucks and diesel engines, chromium emitted by chrome platers, and perchloroethylene emitted by dry cleaning operations. The OMCPU EIR noted that the OMCPU contains policies and performance standards to avoid and/or reduce potential impacts associated with collocation of diverse land uses. While compliance with the OMCPU and General Plan policies, along with local, state, and federal regulations were found to reduce potential impacts, the OMCPU EIR concluded that future projects may result in significant impacts due to the introduction of sensitive uses (residential uses, schools, parks) within the buffer distances of the facilities described in Table 9, *California Air Resources Board Land Use Siting Constraints*. Although Mitigation

Table 9 California Air Resources Board Land Use Siting Constraints

Source Category	Recommended Buffer Distance (feet)
Distribution Centers (that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week)	1,000
Chrome Platers	1,000
Dry Cleaners using Perchloroethylene (1 machine)	300
Dry Cleaners using Perchloroethylene (2 machines)	500
Dry Cleaners using Perchloroethylene (3 or more machines)	Requires consultation with APCD
Large Gas Station (3.6 million gallons or more per year)	300
Other Gas Stations	50

(City of San Diego, 2014b, Table 5.3-7)

Framework AQ-4 would be implemented with future development project in the OMCPU, collocation impacts were identified as significant and unavoidable because it could not be determined in the absence of a detailed evaluation of future implementing development projects whether the proposed mitigation would reduce all impacts to below a level of significance. (City of San Diego, 2014b, pp. 5.3-29, 5.3-31, and 5.3-32) A statement of overriding considerations was adopted for this impact.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Under the proposed Project, the number of external traffic trips as compared to the number of trips that were evaluated in the OMCPU EIR would be reduced by approximately ~~20%~~ 7% (refer to Subsection *Transportation/Traffic*, below). Accordingly, the Project would reduce the potential for CO "Hot Spots" along area roadways as compared to what was assumed for the Central Village by the OMCPU EIR. Therefore, and consistent with the findings of the OMCPU EIR, Project-related impacts due to CO "Hot Spots" would be less than significant.

Similar to the conclusion reached by the OMCPU EIR, sensitive receptors in the Central Village have the potential to be exposed to air toxics from heavily traveled roadways (mobile sources) and from stationary sources associated with collocating residential uses with industrial and commercial uses nearby. The CVSP proposes multi-family residential planning area (PA) 11 and PA 12 immediately south of SR-905 and mixed-use PA 9 approximately 525 feet south of SR-905. PA 9 also abuts light industrial land uses to the north. According to the CVSP's Transportation Facilities Trigger Analysis, the 2025 projected average daily trips (ADT) for I-905 near the CVSP area ranges from 168,600 ADT at Caliente Road to 133,500 ADT at La Media Road. Airway Road, a segment of which traverses the northern portion of the CVSP area, is calculated to carry between 3,600 ADT to 38,800 ADT from sections bordering the Central Village. Due to these traffic volumes, there is a potential that sensitive receivers in the Central Village could be exposed to air toxics associated with mobile source (vehicle tailpipe) emissions and particularly DPM from diesel-fueled vehicles. Modeling at the CVSP site included coordinates for SR-905 (where DPM emitting vehicles could travel) and 14 receptor points in the CVSP area identified by red circles on Figure 7, *Central Village Sensitive Receptor Modeling Locations.* These points are representative of the unobstructed areas onsite to SR-905 and nearby Airway Road, as well as Heritage Road. (Ldn, 2017a, pp. 28-30)

Emissions from diesel exhaust along heavily traveled roadways near the Central Village were derived using data in CVSP's Transportation Facilities Trigger Analysis in association with area wide fleet averages from EMFAC 2011. Results are shown in Attachment C to ~~this report~~ *Technical Appendix A*. Compared to the amount of traffic assumed to be generated by land uses in the Central Village by the OMCPU EIR, the land use arrangement proposed by the CVSP would generate approximately 7,528 fewer overall vehicle trips. Although overall vehicle trips would be reduced under the CVSP, ~~but would potentially increase truck~~ commercial vehicle trips under the proposed CVSP would potentially increase as compared to what was assumed for the OMCPU from the proposed increase of 107 ksf of commercial floor space. The air modeling conducted for this analysis made a conservative assumption that 40%

of the commercial trips within the CVSP area would be from trucks and assumed an industry-standard vehicle mix ratio for the other uses. (Ldn, 2017a, p. 30)

Based on the modeling results that show impacts from vehicle exhaust along heavily traveled roadways, the portions of the CVSP area north of Airway Road (PAs 9 and 10 (mixed use), PAs 11, 12, and 13 (multi-family residential) and PA 17 (park)) would be exposed to carcinogenic risks from DPM that could exceed 10 in one million for 70 year exposure durations (assuming a person stayed in this location for 70 years, 365 days per year, 24 hours per day), which is an unlikely potential. Sensitive receivers located in PA 11 and PA 12 could also exceed a risk potential of 10 in one million for the 9-year exposure duration (assuming a person stayed in this location for 9 years, 365 days per year, 24 hours per day), which is also an unlikely potential. The traffic volumes on SR-905 and the location of sensitive receivers the Central Village area are no higher under the CVSP that would have occurred under the OMCPU; in fact, the CVSP will reduce traffic volumes on regional roadways, including SR-905, due the changes in land uses proposed in the Central Village by the CVSP. As such, the CVSP reduces risk potential compared to the OMCPU. (Ldn, 2017a, p. 30)

Table 10, *Potential Cancer Risk Calculations at Each Receptor*, shows the AERMOD predicted DPM concentrations as well as calculated cancer risks from vehicular traffic from SR-905 as well as Heritage Road and Airway Road. Also, it should be noted that these risk rates would not be expected until and unless SR-905 carries its calculated buildout traffic volume of 164,100 ADT. After reviewing the modeling results, the analysis demonstrates that these worst-case potential impacts would be reduced to less than significant by installing mechanical air quality filtration systems on the fresh air intake systems of the residential uses in affected areas. Filtration systems with a Maximum Efficiency Reporting Value (MERV) of 13, which has been found to reduce particulates 2.5 microns or less by 87 to 95% (CARB, 2012) would likely achieve this result. A requirement for this feature is specified as a Design Standard in the CVSP as follows. Thus, the impact would be reduced to less than significant. In addition, the CVSP includes a Design Standard and a Policy to orient residential uses away from SR-905. (Ldn, 2017a, pp. 30-32)

Table 10 Potential Cancer Risk Calculations at Each Receptor

Modeling Results		Cancer Risk per one million exposed		
Receptor	Emission Concentration (ug/m^3)	9 Years	30 Years	70 Years
R1	**0.009560907**	4.7	7.5	**11.7**
R2	**0.00952616**	4.6	7.5	**11.7**
R3	**0.016906339**	8.2	**13.3**	**20.8**
R4	0.00662113	3.2	5.2	8.1
R5	0.004695002	2.3	3.7	5.8
R6	0.003822957	1.9	3.0	4.7
R7	0.002980091	1.5	2.3	3.7
R8	0.005317525	2.6	4.2	6.5
R9	0.006548992	3.2	5.1	8.0
R10 Park*	0.01747005	8.5	13.7	21.5
R11	**0.047848336**	**23.3**	**37.6**	**58.8**
R12	**0.04643322**	**22.6**	**36.5**	**57.0**
R13	0.005279119	2.6	4.1	6.5
R14	0.00517814	2.5	4.1	6.4
*A Park is not considered a use with long exposure times and therefore is not considered sensitive				

(Ldn, 2017a, Table 4.3)

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

Policy 2.5-54: Residential units located north of Airway Road should be designed to minimize building openings (windows and doors) and usable outdoor spaces (balconies, patios, etc.) from having a direct line-of-sight with SR-905.

Also, physical barriers such as walls and vegetative buffers that would occur between sensitive receivers in these locations and sounding roadways would likely increase DPM deposition rates causing airborne DPM to settle out of the air, which will further reduce cancer risks. (Ldn, 2017a, p. 32)

Residential PAs 5 and 8 of the CVSP would be located in close proximity to off-site light and heavy industrial uses to the south and southeast. As concluded by the OMCPU EIR, the collocation of residential and industrial uses would have the potential to result in air pollution-related health effects to sensitive receptors. Therefore, the OMCPU EIR concluded that the potential exposure of sensitive receptors to air toxics would be significant and unavoidable. The CVSP would have no effect on the location, composition, or operational characteristics of off-site industrial uses, and the CVSP plans for the locations of residential uses in the same proximity to off-site areas as called for by the OMCPU. Therefore, the CVSP would not create any new impacts or more severe impacts. Further, Design Standard 2.2-11 (listed above) would address contribute to reducing the impact. Additionally, the following CVSP Policy is pertinent (Ldn, 2017a, pp. 32-33):

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

- Provide landscape screening and/or patio walls to reduce noise impacts and protect the privacy of residential units along high traffic streets and intense uses.
- Address noise through the use of berms, planting, setbacks, and architectural design rather than with conventional wall barriers for generating uses.
- Minimize the number of residential units that have window and door openings that afford views into adjacent industrial uses located east of the Central Village. Whenever possible, orient the short end of buildings towards industrial uses.

Finally, it should be noted that all offsite sources which have the ability to generate toxic air contaminants from operations are required to work with the SDAPCD and report emissions and obtain permits to operate. These requirements are independent of the proposed CVSP Project, so impacts caused by existing and future off-site industrial activities or operations would be expected to be less than significant. (Ldn, 2017a, p. 33)

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project's air quality study found that odor impacts would not significantly change under the proposed Project, as the development area (229.2 ac) proposed by the CVSP

would be the same development area (229.2 ac) as specified for the Central Village by the OMCPU and the land uses are similar, which do not include any substantial odor generating uses (Ldn, 2017a, pp. 22-23).

Consistent with the conclusion reached in the OMCPU EIR, the Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, standard construction practices would minimize the odor emissions and their associated impacts. Any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700, which prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health or safety of the public, including odors. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction.

During long-term operation, the proposed Project would include residential, commercial, and recreational land uses, which are not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project's long-term operational use could be a potential source of odor. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, thereby precluding any significant odor impact. Furthermore, CVSP Policy 2.5-58, although proposed to address noise at loading areas of commercial buildings, would also address potential sources of odor in these areas; the policy states: "In commercial buildings, place loading and unloading areas so that commercial buildings shield nearby residential land uses from noise generated by loading dock and delivery activities." Also, future development projects that implement the proposed Project would be required to comply with SDAPCD Rule 51 (Public Nuisance) and California Health & Safety Code, Division 26, Part 4, Chapter 3, Section § 41700. SDAPCD Rule 51 and Section 41700 prohibit the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public, including odors. As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people and the Project would have a less-than-significant impact.

Based on the above analysis and consistent with the conclusion reached in the OMCPU EIR, buildout of the Project would result in less-than-significant impacts due to odors. Therefore, the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

BIOLOGICAL RESOURCES

In order to evaluate the proposed Project's potential impacts to biological resources, a Biological Resources Report Addendum (BRRA) was prepared by Alden Environmental, Inc., and dated January 2017. The BRRA is included as *Technical Appendix B* to this Addendum. The purpose of the BRRA is to evaluate the currently proposed Project and determine if the impacts to biological resources associated with its implementation fall within the scope of impacts to biological resources associated with its implementation fall within the scope of impacts disclosed in the OMCPU EIR and whether any additional mitigation measures beyond those presented in the OMCPU EIR are warranted. As such, ~~this report~~ the BRRA serves as an addendum to the biological resources report prepared for the OMCPU EIR. Refer to Subsection 2.0 of the BRRA for a detailed discussion of the methodologies used in the analysis. (Alden, 2017, p. 1)

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

OMCPU EIR

The OMCPU EIR found that implementation of the OMCPU would have the potential to directly impact sensitive plants and animals through the loss of habitat or indirectly by locating development adjacent to the MHPA. Affected sensitive species include: coastal California gnatcatcher, Quino checkerspot butterfly, San Diego fairy shrimp, Riverside fairy shrimp, San Diego horned lizard, Belding's orange-throated whiptail, western burrowing

owl, coastal cactus wren, northern harrier, Cooper's hawk, golden eagle, least Bell's vireo, and southern California rufous-crowned sparrow. As such, the OMCPU EIR found that these potential impacts to protected species of plants or animals would be significant. The OMCPU EIR identified Mitigation Framework BIO-1 to reduce significant impacts to below a level of significance. Mitigation Framework BIO-1 requires the preparation of site-specific biological resources surveys before implementing development projects are approved in accordance with the City of San Diego Biology Guidelines (City of San Diego, 2012) and mitigation for impacts to sensitive upland habitats to occur in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines. In addition, the OMCPU EIR found that potentially significant construction-related noise impacts to sensitive animals would be reduced with implementation of Mitigation Framework LU-2 and BIO-2. The OMCPU EIR concluded that with implementation of Mitigation Frameworks BIO-1, BIO-2, and LU-2, potentially significant impacts to sensitive plant and animal species would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.4-43 through 5.4-61)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project site is located in an area that has the potential to contain species identified as a candidate, sensitive, or specific status species. The BRRA focuses on the 222.9-acre SPA and compares the biological resources conditions for the SPA as reported in the OMCPU EIR with currently known biological resources conditions (as recently assessed by Alden). The BRRA also compares the impacts to biological resources reported in the OMCPU EIR for the SPA with the potential impacts to biological resources that could occur from adoption of the proposed CVSP based on current conditions. Finally, the BRRA presents applicable mitigation measures from the OMCPU EIR that would be required to reduce significant impacts to biological resources resulting from approval of the proposed CVSP. (Alden, 2017, p. 1) The Project's impacts to sensitive species are detailed below:

- *Quino Checkerspot Butterfly (QCB):* The OMCPU EIR assumed potential presence of QCB. Within the SPA, potential QCB habitat (Diegan coastal sage scrub and maritime succulent scrub) occurs in the central portion and in the southwestern portion of the CVSP area where future development would occur. The QCB was not observed during multiple USFWS protocol-level surveys conducted on the central portion of the property. The QCB has moderate potential to occur in the Project area in potential QCB habitat. The OMCPU EIR states that implementation of the OMCPU has the potential to impact the QCB. Therefore, adoption of the proposed CVSP with its potential to affect the QCB would not represent a new impact, and the Mitigation Frameworks identified by the OMCPU EIR would continue to apply to the proposed Project and would reduce potential impacts to the QCB to less-than-significant levels. (Alden, 2017, pp. 3, 11)

- *Coastal California Gnatcatcher (CAGN):* Presence/absence of the coastal California gnatcatcher was determined as part of a USFWS protocol-level surveys in 2015. While none of the CAGN observations covered the central portion of the Project site, the CAGN was observed in Diegan coastal sage scrub just north of the CVSP area in the MHPA (outside the CVSP area). Since the habitat where the birds were observed is contiguous with that in the CVSP, all Diegan coastal sage scrub on the central portion of the Project site (which is also in the MHPA) was considered to be occupied by the CAGN. Similarly, a CAGN was observed in Diegan coastal sage scrub-disturbed in the northern portion of the eastern area of the site in the MHPA during the QCB survey in 2015 (Refer to Figure 9). It is assumed for purposes of this analysis that all of the Diegan coastal sage scrub in this area, within the MHPA, is occupied by the CAGN. Potential CAGN habitat (Diegan coastal sage scrub and maritime succulent scrub) also occurs in the southern portion of the CVSP area and on other portions of the southwestern portion of the SPA. Direct impacts to CAGN habitat outside of the MHPA would occur under the CVSP; however, none of the direct impacts would be inside the MHPA, although some direct impacts would occur adjacent to the MHPA, which was anticipated by the OMCPU EIR. Direct impacts resulting from the introduction of residential uses adjacent to the MHPA are discussed further below). (Alden, 2017, pp. 3, 11)

  Consistent with the conclusions reached by the OMCPU EIR, direct impacts to CAGN-occupied habitat outside of the MHPA and potential indirect impacts to the CAGN in the MHPA during construction within the SPA's adjacent development areas could occur. (Alden, 2017, pp. 3, 11)

The OMCPU EIR states that direct impacts to CAGN-occupied habitat in the MHPA could occur from implementing the Otay Mesa Community Plan Update land use plan. The OMCPU EIR also states that indirect impacts (temporary construction noise) may occur to this species if construction occurs during the breeding season. Therefore, adoption of the proposed CVSP with its potential to directly and indirectly affect the CAGN would not represent a new impact, and the Mitigation Frameworks identified by the EIR would continue to apply to the proposed Project. (Alden, 2017, pp. 3, 11)

- *Burrowing Owl (BUOW)*: Surveys for the BUOW were conducted by Alden on portions of the CVSP in 2014, 2015, and 2016. The BUOW was not found during the on-the-ground surveys in the central and eastern portions of the site during any of the surveys. According to the OMCPU EIR, the BUOW occupies open areas including native and non-native grassland, sparsely vegetated shrubland, agricultural land, and disturbed land. In addition to the central and eastern portions of the Project site, these open areas occur throughout most of the remainder of the CVSP area. The BUOW has moderate potential to occur in open areas of the SPA including non-native grassland, agricultural land, and disturbed land. Consistent with the conclusion reached by the OMCPU EIR, the CVSP proposes development in and adjacent to areas that could support BUOW, resulting in potential direct and indirect impacts to BUOW. The OMCPU EIR states that impacts to BUOW would include direct impacts to individuals, nests, and suitable nesting habitat, and indirect impacts from 'eradication of host burrowers; changes in vegetation management (i.e., grazing); use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in the harassment of owls at occupied burrows' (CDFW 2012 in City 2014). The same types of impacts could occur from implementation of the CVSP. Therefore, adoption of the proposed CVSP with its potential to affect the BUOW would not represent a new impact and the Mitigation Frameworks identified by the EIR would continue to apply to the proposed Project. (Alden, 2017, pp. 4, 11)

- *Sensitive Plant Species*: Five sensitive plant species were found on the eastern portion of the Project site during a sensitive plant survey in 2014. Subsequent sensitive plant surveys were conducted within the CVSP area in 2015, and 2016, and no sensitive plant species were observed. The OMCPU EIR concluded that implementation of the Otay Mesa Community Plan Update land use plan would have the potential to directly impact sensitive plants. The OMCPU EIR assumed potential impacts to 23 different sensitive plant species, of which mapping indicated the potential presence of San Diego barrel cactus and San Diego County sunflower in the CVSP area.

  As stated in the OMCPU EIR, however, "due to the fact that portions of the biological resource assessment [used for the OMCPU EIR] are based on secondary source information rather than site specific field surveys, the impacts [disclosed in the OMCPU EIR] would be refined for individual projects." As anticipated by this statement in the OMCPU EIR, and based on more recent field survey work, five sensitive plant species were found on the Project site during a sensitive plant survey conducted in 2014. An additional sensitive plant survey was conducted in the central portion of the site in 2016, and no sensitive plant species were identified. No sensitive plant species were found on the western portion of the property during the 2015 survey. No sensitive plant species surveys were conducted on other properties in the SPA. The following species were identified in the eastern portion of the site during the sensitive plant survey conducted in 2014 (Alden, 2017, p. 12):

  - Ashy spikemoss (*Selaginella cinerascens);*
  - San Diego barrel cactus (*Ferocactus viridescens)*;
  - San Diego County sunflower (*Bahiopsis [Viguiera] laciniata*);
  - Seaside cistanthe (*Cistanthe maritima*); and
  - Small-flowered morning glory (*Convolvulus simulans).*

Ashy spikemoss, seaside cistanthe, and small-flowered morning glory (found on the Project site in 2014) were not noted by the OMCPU EIR as known or considered to have potential to occur in the OMCPU area. However, ashy spikemoss, seaside cistanthe, and small-flowered morning glory have a California Rare Plant Rank of 4 in the Inventory of Rare and Endangered Plants (CNPS, 2016a), and the FEIR did disclose the potential presence of and

impacts to Rare Plant Rank 4 species in the OMCPU area. According to the OMCPU EIR, Rare Plant Rank 4 species are considered sensitive plant species because they are considered "noteworthy" species "by local conservation organizations." Further, the CNPS "strongly recommend[s] that California Rare Plant Rank 4 plants be evaluated for impact significance during preparation of environmental documents relating to CEQA" (Alden, 2017, p. 12; CNPS, 2016b)

Assuming that the five sensitive plant species found on the Project site in 2014 are present, adoption of the proposed CVSP would result in impacts to known locations of small-flowered morning glory on the Project site. No impacts would occur to ashy spikemoss and seaside cistanthe in their 2014 identified locations because planned development in the CVSP area would avoid those species' identified locations. Small-flowered morning glory, which would potentially be impacted in its 2014 identified locations in the eastern portion of the Project site, occurs in clay soils and serpentinite seeps in chaparral openings, coastal scrub, and valley and foothill grassland habitats (CNPS, 2016a). There is potential habitat for the species to also occur in the southwestern portion of the SPA (i.e., in non-native grassland and Diegan coastal sage scrub with gravelly clay loam soils. (Alden, 2017, p. 12)

Ashy spikemoss is a perennial rhizomatous herb that occurs in chaparral and coastal scrub habitat. This species was found in non-native grassland on the Project site in 2014. However, its more typical habitat, Diegan coastal sage scrub, occurs along the northern border and in the southwestern portion of the SPA within the SPA's impact footprint. (Alden, 2017, p. 12)

Seaside cistanthe is an annual herb that blooms from February to August and occurs in sandy soils in coastal bluff scrub, coastal scrub, and valley and foothill grassland habitats. While there are no sandy soils in the SPA, this species was found in Diegan coastal sage scrub on cobbly loam soil. Therefore, there is potential habitat for the species in the western and southwestern portions of the SPA within the SPA's impact footprint (i.e., non-native grassland and Diegan coastal sage scrub with cobbly loam soil. (Alden, 2017, p. 12)

Even though the OMCPU EIR did not specifically call out potential impacts to these three species, the OMCPU EIR did identify the loss of San Diego County sunflower (also a Rare Plant Rank 4 species) which was found in the SPA in 2014 on the Project site. Because the OMCPU EIR acknowledged that additional species beyond those reported in the OMCPU EIR could be found during site-specific field work, and mitigation for the loss of sensitive plant species regardless of the species type is provided by the OMCPU EIR to reduce impacts to less than significant levels, the potential loss of Rare Plant Rank 4 species in the CVSP area that were not specifically called out by their common or scientific names in the OMCPU EIR does not constitute a new impact. Consistent with the conclusion reached by the OMCPU EIR, adoption of the proposed CVSP would have a "substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status" (City of San Diego, 2014b). Adoption of the proposed CVSP with its potential to directly affect Rare Plant Rank 4 plant species would not represent a new impact. (Alden, 2017, p. 13)

Future implementing site-specific discretionary actions would be required for each implementing development to show compliance with OMCPU EIR Mitigation Frameworks BIO-1, BIO-2, and LU-2. Although the proposed CVSP would not allow for site-specific development to occur absent future discretionary actions on development applications, the BRRA states that the anticipated impacts associated with implementation of the CVSP are essentially the same as those disclosed by the OMCPU EIR, and mitigation for those impacts observes the Mitigation Framework outlined in the OMCPU EIR. Therefore, the proposed Project is in substantial conformance with the findings of the OMCPU EIR, and no new significant impacts or more severe impacts would occur as a result of the proposed Project. (Alden, 2017, p. 23)

Impacts to biological resources that would occur as a result of the proposed Project were disclosed in the OMCPU EIR, and mitigated to less than significant levels. Each implementing development project would be required per CEQA Significance Threshold requirements, and per OMCPU EIR Mitigation Framework BIO-1, to conduct a site specific biological resources survey for the area to be physically affected by the development to determine the potential site-specific impacts to sensitive plant and animal species. Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact to sensitive plant and animal species. Therefore, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project is located in an area that supports the movement of migratory wildlife. However, development on the Project site was anticipated by the OMCPU EIR; thus, the proposed Project is within the scope of the OMCPU EIR's analysis of impacts to migratory species. Future implementing projects within the CVSP area would be subject to the OMCPU EIR Mitigation Framework BIO-2, which requires the preparation of a site-specific biological resources survey in accordance with City of San Diego Biology Guidelines and the incorporation of measures to minimize direct impacts on wildlife movement in order to comply with the applicable federal and state regulations prior to the issuance of any permit. Accordingly, and consistent with the findings of the OMCPU EIR, compliance with Mitigation Framework BIO-2 would ensure the Project's impacts to migratory species would be less than significant.

Would the CVSP result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral?

OMCPU EIR

The OMCPU EIR found that the OMCPU would result in significant impacts to Tier I, II, IIIA, and IIIB habitats, which include maritime succulent scrub, native grassland, Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. As shown in Figure 8, the OMCPU EIR anticipated impacts to 211.6 acres of vegetation communities/land cover types within the Central Village The OMCPU EIR concluded that compliance with OMCPU policies and development regulations and standards and implementation of Mitigation Framework BIO-1, requiring site specific-biological resources studies to be conducted for implementing development projects in accordance with the City's Biology Guidelines and mitigation for impacts to sensitive upland habitats to be in accordance with the MSCP mitigation ratios specified within the City's Biology Guidelines, impacts would be reduced to below a level of significance. (Alden, 2017; City of San Diego, 2014b, pp. 5.4-64 and 5.4-65)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The OMCPU EIR reported six vegetation communities/land cover types are located in the Specific Plan Area (SPA) in the OMCPU EIR. The BRRA confirmed that each of these identified communities is still present in the Specific Plan Area, although the extent of their current coverage is different that was disclosed in the OMCPU EIR. In addition, the current coverage data collected by Alden indicates that one additional vegetation community is present (i.e., non-native vegetation). The difference in vegetation communities reported between the OMCPU EIR and the BRRA is the result of more refined mapping done for the BRRA and/or changes in the actual field conditions. Figure 8, *EIR Vegetation Communities and Land Cover Types/Impacts,* shows the vegetation mapping that was reported in the OMCPU EIR. Figure 9, *Central Village Vegetation Communities, Land Cover Types, and Sensitive Species/Impacts,* shows the results of the vegetation mapping included in the BRRA. The greatest change is in the reported amount of maritime succulent scrub; the OMCPU EIR reported a much greater extent of coverages for this vegetation community than is actually present

under existing conditions. A comparison of the acreages for each of these communities/land cover types as reported in the EIR and as they currently occur on the Project site is provided in Table 11, *Existing Vegetation Communities/Land Cover Types in the Central Village*. (Alden, 2017, pp. 2-3)

Consistent with finding of the OMCPU EIR, there is no riparian habitat located within the 229.2-acre Project site. The proposed Project would result in impacts to 212.6 acres of habitat, representing an increase in impacts by 1.0 acre as compared to the 215.6 acres of impact disclosed by the OMCPU EIR. The increase of 1.0-acre is due to the inclusion of a one-acre parcel within proposed Planning Area 1 that was previously identified for open space land uses (refer to Figure 9) but is proposed for development under the CVSP. Table 12, *Anticipated Impacts to Vegetation Communities/Land Cover Types*, shows the anticipated impacts to vegetation communities/land cover types as shown in the OMCPU EIR, and the proposed Project's impacted acreage. As shown in Table 12, the proposed Project would decrease impact to Tier I habitats by approximately ~~6.2~~ 19.1 acres as compared to what was disclosed for the Central Village area by the OMCPU EIR, while impacts to Tier II habitats would be reduced by ~~7.3~~ 5.6 acres.

Table 11 Existing Vegetation Communities/Land Cover Types in the Central Village

Vegetation Community/ Land Cover Type	Tier	FEIR Acreage	Current Acreage
Maritime succulent scrub	I	24.4	0.5
Diegan coastal sage scrub	II	24.3	31.4
Non-native grassland	IIIB	37.8	46.0
Non-native vegetation	IV	--	0.3
Agriculture	IV	115.6	111.5
Disturbed land	IV	18.9	11.5
Urban/Developed	NA	8.2	28.0
TOTAL	--	**229.2**	**229.2**

[1]Acreage rounded to the nearest tenth.

(Alden, 2017, Table 1)

Table 12 Anticipated Impacts to Vegetation Communities/Land Cover Types

Vegetation Community/ Land Cover Type	Tier	Acreage Impacted in the FEIR	Proposed Impacted Acreage
Maritime succulent scrub	I	19.6	0.5
Diegan coastal sage scrub	II	14.4	20.0
Non-native grassland	IIIB	37.8	44.4[2]
Non-native vegetation[3]	IV	--	0.3
Agriculture	IV	113.7	108.9
Disturbed land	IV	18.0	10.6[2]
Urban/Developed	NA	8.1	27.9
TOTAL	--	**211.6**	**212.6**

[1]Acreage rounded to the nearest tenth.
[2]Includes <0.1 acre of impact outside the SPA to facilitate a connection of Airway Road to the west.
[3]The FEIR did not identify non-native grassland in the SPA, but the FEIR did identify non-native grassland elsewhere in the Otay Mesa Community Plan Update area to be impacted.

(Alden, 2017, Table 3)

Because impacts to these vegetation communities/land cover types were already addressed in the OMCPU EIR, and because the Project would result in fewer acres of impact to high-sensitivity (i.e., Tier I and II) habitats overall (even with the proposed 1.0-acre of increased total impact), implementation of the proposed Project would not introduce a new impact to vegetation communities/land cover types beyond what was evaluated and disclosed by the OMCPU EIR. All future implementing projects within the CVSP area would be subject to the OMCPU EIR Mitigation Framework BIO-1, which requires the preparation of a site-specific biological resources study to be conducted in accordance with the City's Biology Guidelines prior to the issuance of any permit. Accordingly, and consistent with the findings of the OMCPU EIR, the proposed Project would have a less-than-significant impact due to a conflict with sensitive habitats. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Alden, 2017, p. 3)

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

Would the CVSP meet the objectives of the MSCP Subarea Plan's Land Use Adjacency Guidelines or conflict with the provisions of the MSCP Subarea Plan, or other approved local, regional, or state conservation plans?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project site is located adjacent to the MHPA boundary; however, the proposed CVSP does not propose an MHPA boundary adjustment. Portions of the Project site are located adjacent to the MHPA boundary and future site-specific discretionary actions would be required to comply with the MSCP in accordance with the OMCPU EIR's Mitigation Framework LU-2, requiring MHPA adjacency impacts to be addressed at the project-level. Therefore, an MSCP Subarea Plan and MHPA adjacency consistency analysis was conducted for the proposed Project. The consistency analysis focuses on potential MHPA adjacency impacts associated with the proposed Project and other MSCP Subarea Plan policies for which conditionally compatible uses and development proposals at the project level in the CVSP area must comply. A detailed analysis of the CVSP's compliance with the MSCP Subarea Plan is provided in BRRA Subsection 5.0, *MSCP Consistency*. The MSCP Subarea Plan consistency analysis as provided in BRRA Subsection 5.0 found that the proposed Project would be consistent with the impacts disclosed in the OMCPU EIR, and in addition, the consistency analysis found that the CVSP provides Design Standards and Policies that protect the MHPA and comply with the MHPA Land Use Adjacency Guidelines. Impacts to the MHPA caused by the Project were within the scope of the OMCPU EIR, and all impacts due to conflicts with the MSCP and MSCP Subarea Plan's Land Use Adjacency Guidelines will be mitigated to a level below significance by Mitigation Framework LU-2, and through implementation of the Project's Specific Plan Design Standards and Policies. The proposed CVSP includes policies and design standards to address the MHPA Land Use Adjacency Guidelines, and provides for adequate buffers between uses, implementation of erosion control measures, landscape plantings, and prohibits the use of invasive plant species within the Project area.

Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Alden, 2017, pp. 13-22).

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

Implementation of the proposed Project includes a "Village-Wide Plant Palette" and a mandatory Design Standard which prohibits the use of invasive plant species within the CVSP. CVSP Design Standard 2.5-3 states "Prohibited and invasive plant species shall not be knowingly used within Central Village. Prohibited plants are those which do not satisfy the minimum performance standards for the site area per the City's Municipal Code Chapter 14, Article 2, Division 4, *Landscape Regulations*." Furthermore, the impacts associated with the Project were within the scope of the OMCPU EIR, which were found to be less than significant with mitigation framework LU-2. Each jurisdictional development would be subject to compliance with the CVSP and all required Design Standards, as well as OMCPU EIR mitigation framework LU-2, which requires a project's landscape plan to contain a mix of native species to be located adjacent to the MHPA and prohibits the use of exotic plants and invasive species, and for the Project biologist for each project to identify mitigation measures needed to reduce impacts below a level of significance. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filling, hydrological interruption, or other means?

OMCPU EIR

The OMCPU EIR found that future development projects implemented in accordance with the OMCPU would result in significant impacts to federally protected wetlands, vernal pools, and other jurisdictional water resources, including riparian habitat; vernal pools and vernal pool species; and basins with fairy shrimp. The OMCPU EIR identified Mitigation Framework BIO-4 to reduce impacts, which requires compliance with federal wetland permitting requirements. Mitigation Framework BIO-4 also requires site-specific biological resources surveys to be conducted in association with implementing development projects in accordance with the City's Biology Guidelines, and mitigation for impacts to wetlands to be implemented in accordance with MSCP mitigation ratios specified in the City's Biology Guidelines. The OMCPU EIR concluded that even with adherence to Mitigation Framework BIO-4, it is not feasible to determine the level of compliance of future projects at the program-level. Therefore, the OMCPU EIR disclosed impacts to federally protected wetlands as significant and unavoidable and a statement of overriding considerations was adopted for this impact. (City of San Diego, 2014b, pp. 4.5-69 and 5.4-70)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project site does not contain any known wetland habitat (City of San Diego, 2014b, Figure 5.4-7; Alden, 2017). Therefore, at the program-level of analysis, implementation of the proposed Project would not result in any new significant impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Buildout of the proposed Project would result in temporary construction noise from the OMCPU and/or permanent noise generators (including roads) that could adversely impact sensitive species within the MHPA. On the program-level, the Project merely implements guidelines, and associated impacts were within the scope of the OMCPU EIR, and were found to be less than significant with implementation of mitigation frameworks BIO-1, BIO-2, and LU-2 on a project level. Each jurisdictional development would be required to comply with the OMCPU EIR mitigation frameworks, and CEQA Significance Thresholds requirements, as identified in the MMRP of this document, which would require site-specific biological surveys be conducted. Therefore, at the program-level of analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

HISTORICAL RESOURCES

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

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Although there are no known historical structures that occur within the Central Village area (City of San Diego, 2014b, Table 5.5-2), ground-disturbing activity associated with future implementing actions within the Central Village would have the potential to impact subsurface prehistoric and historical resources, if any such resources are unearthed. Therefore, buildout of the proposed Project would have the potential to result in significant aesthetic and physical impacts to prehistoric historic archeological resources. However, future implementing projects would be subject to the OMCPU EIR Mitigation Frameworks HIST-1 and

HIST-2, which require the preparation of a site-specific archeology study and a determination from the City as to whether any buildings proposed for demolition are historically significant per the Historical Resources Guidelines prior to the issuance of any permit. Compliance with Mitigation Frameworks HIST-1 and HIST-2 would ensure that future construction activities associated with the buildout of the proposed Project do not adversely affect prehistoric and historic archeological resources. Accordingly, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant aesthetic and physical impacts to prehistoric and historic archeological resources at the program-level. Therefore, at the program-level of analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Although there are no known religious or sacred resources that occur on-site (City of San Diego, 2014b, Table 5.5-2), ground-disturbing activities associated with the buildout of the proposed Project would have the potential to result in significant impacts to religious or sacred resources. However, future site-specific discretionary actions would be subject to OMCPU EIR mitigation framework HIST-1 if determined through site specific CEQA review. Compliance with mitigation framework HIST-1 would ensure that future construction activities associated with the buildout of the Project do not adversely impact religious or sacred uses within the Project site. Accordingly, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impacts to sacred and religious resources at the program-level. Therefore, at the program-level of analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. There are no known human remains on the 229.2-acre Project site, including those that may be interred outside of a formal cemetery (City of San Diego, 2014b, Table 5.5-2). Although unlikely, ground disturbing activities associated with future site-specific development projects could result in significant impacts to human remains, should any human remains exist beneath the site's surface. California State law addresses the treatment of human remains that may be discovered during a construction project. If human remains are encountered during future development of the site, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made by the Coroner. If the Coroner determines the remains to be Native American, the California Native American Heritage Commission (NAHC) must be contacted and the NAHC must then immediately notify the "most likely descendant(s)" of

receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Furthermore, future site-specific development projects would be subject to compliance with Mitigation Framework HIST-1. Consistent with the finding of the OMCPU EIR, compliance with applicable State regulations and Mitigation Framework HIST-1 would ensure that impacts associated with the discovery of human remains would be less than significant at the program level. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

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

OMCPU EIR

Wildfires

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

Airports

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

CENTRAL VILLAGE PROJECT

Wildfires

No Substantial Change from Previous Analysis. As discussed in the OMCPU EIR, the Project site is located adjacent to natural open space areas; thus, the Project site is subject to a significant risk of wildfire hazards. However, future site specific discretionary actions within the Central Village would be subject to OMCPU EIR Mitigation Framework HAZ 1, which requires future projects to incorporate sustainable development practices into site plans in accordance with the City's Brush Management Regulations and Landscape Standards pursuant to General Plan and OMPCU policies intended to reduce the risk of wildfires and be reviewed for compliance with applicable state and local regulations. Mitigation Framework HAZ-1 also requires that all future projects be reviewed by the City for compliance with the 2010 California Fire Code, Section 145.07 of the LDC, and Chapter 7 of the California Building Code. Furthermore, Subsection 2.5.3.5 of the CVSP requires that all future implementing development within the Central Village must comply with Land Development Code § 142.0412, *Brush Management*. Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with wildfire hazards would be less than significant.

Airports

No Substantial Change from Previous Analysis. The Project site is located approximately 0.25 mile south of the Brown Field Municipal Airport (Google Earth, 2015). The Project site is located within the Airport Influence Area (AIA) for the Brown Field Municipal Airport and is subject to the Brown Field Municipal Airport Land Use Compatibility Plan (ALUCP), which was adopted in January 2010 (ALUC, 2010, Exhibit III-6). The Central Village area is identified by the ALUCP as being located in "Zone 6 – Traffic Pattern Zone" (ALUC, 2010, Exhibit III-2). Lands within Zone 6 are considered to have a "low" risk for impacts due to airport operations (ALUC, 2010, Appendix C, Table C-1). The CVSP was submitted to the San Diego County Regional Airport Authority (SDCRAA), which serves as the Airport Land Use Commission (ALUC) for Brown Field, for a consistency determination with the ALUCP. A consistency determination is required to ensure that the land uses and development standards proposed by the CVSP are consistent with the ALUCP. The CVSP was determined to be consistent with the Brown Field Municipal Airport ALUCP by the ALUC on February 24, 2017 (ALUC, 2017). The following design standard is incorporated into the proposed CVSP to address consistency with the ALUCP.

Design Standard 2.2-12 Developments within the Central Village shall be required to comply with the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code, which implements the policies and criteria in the Airport Land Use Compatibility Plan (ALUCP) applicable to Brown Field Municipal Airport. Compliance with the ALUCP is required because the Central Village is located within the Airport Influence Area for Brown Field Municipal Airport, and properties within the Central Village may be subject to some of the annoyances or inconveniences associated with proximity to an airport and aircraft operations (for example, noise, vibration, overflights or odors). The City of San Diego Airport Division may be contacted for information regarding hours of operation, master plans, and other relevant information regarding airport operations. The FAA shall have the sole and exclusive regulatory authority over the operation of aircraft.

In addition, future implementing development projects that require a formal amendment of the CVSP would be subject to review by the ALUC for consistency with the ALUCP. Furthermore, future discretionary actions associated with buildout of the proposed Project would be required to comply with OMCPU EIR Mitigation Framework HAZ-2, which requires future development projects to obtain a Federal Aviation Administration (FAA) determination of "No Hazard to Air Navigation." Accordingly, because the OMCPU is consistent with the ALUCP, and the proposed CVSP is consistent with the ~~OMCPU~~ Brown Field Municipal Airport ALUCP, consistent with the findings of the OMCPU EIR, impacts associated with aircraft hazards would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP create a future risk of an explosion or the release of hazardous substances (including, but not limited to, gas, oil, pesticides, chemicals, or radiation)?

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

OMCPU EIR

The OMCPU EIR found that the OMCPU would site residential uses near existing industrial development or existing properties of environmental concern, as well as industrial and commercial land use designations that would allow certain business and industrial operations to generate, transport, or temporarily store hazardous waste within the vicinity of residential uses. Additionally, the OMCPU EIR noted that trucks serving local businesses would expose residents to hazards associated with the release of hazardous materials (i.e., spillage; accidents, and explosions) that would be transported through the OMCPU area. However, the OMCPU EIR concluded that improved roadway and transportation modifications would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Additionally, the OMCPU EIR noted that implementation of the policies contained in the General Plan, OMCPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency (EPA), Resource Conservation and Recovery Act (RCRA), California Department of Health Services (DHS), County of San Diego Department of

Environmental Health (DEH), and Caltrans would reduce potential impacts to below a level of significance. As such, the OMCPU EIR concluded that impacts due to the exposure of people or the environment to a significant hazard through the release of hazardous substances or routine transport, use, or disposal of hazardous materials Impacts would be less than significant and no mitigation was required. (City of San Diego, 2014b, pp. 5.6-21 through 5.6-26)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Although the proposed Project provides more specificity about the location and intensity of land uses on the Project site than did the OMCPU, the allowance of residential land uses to be developed in close proximity to existing and planned industrial uses that may utilize hazardous substances is the same. Therefore, consistent with the conclusion reached by the OMCPU EIR, the Project would have the potential to expose people to hazards associated with hazardous materials. However, as discussed in the OMCPU EIR, future site-specific discretionary actions would be required to comply with the General Plan and OMCPU policies and design guidelines that minimize collocation issues, which require buffers and distance separation for residential uses located near industrial uses with hazardous or toxic substances (City of San Diego, 2014a, p. LU-19) to ensure that impacts would be less than significant. The proposed CVSP includes standards to ensure that future site-specific discretionary actions provide adequate buffers to separate uses from truck traffic and industrial uses located east of Cactus Road (see Specific Plan Policies 2.5-42 and 2.5-43). Additionally, trucks serving nearby industrial land uses would have the potential to expose residents in the CVSP area to hazards associated with the release of hazardous materials. However, as discussed in the OMPCU EIR, improved roadway and transportation modifications pursuant to the OMCPU Mobility Element and the proposed CVSP's Mobility Element would reduce the potential risk of exposure. Risks also would be reduced because Siempre Viva Road is identified by the OMCPU as a "Truck Activity Road," providing connections between industrial uses to the south of the Project site and "Truck Routes" located to the east; thus, the amount of truck traffic along Cactus Road adjacent to the Central Village would be reduced. Furthermore, future discretionary actions to implement the Project would be subject to OMCPU EIR Mitigation Framework HAZ-3, which would require the preparation of a Phase I Environmental Site Assessment to ensure that the Project site is not subject to hazardous conditions related to surrounding land uses or activities. Accordingly, and consistent with the findings of the OMPCU EIR, a less-than-significant impact would occur. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP uses be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. According to the hazardous materials study prepared for the OMCPU EIR, the Project site contains two hazardous sites, including the Martinez Ranch Compound located at 2160 Cactus Road and the Martinez Ranch Canyon Fill located approximately 0.25 mile southwest of the Martinez Ranch Compound (Geocon, 2012, Figure 3-3). The hazardous materials study identified both of these sites as

containing hazardous materials that would be potentially significant to the public or environment (Geocon, 2012, Table 1). As discussed in the OMCPU EIR, future implementing projects within the Central Village would be required to comply with Mitigation Framework HAZ-3 to reduce potentially significant impacts, which requires the preparation of a Phase I Site Assessment to ensure that all on-site contamination has been avoided or remediated in compliance with local, state, and federal regulations. As such, future development associated with buildout of the proposed Project also would be required to comply with Mitigation Framework HAZ-3 to reduce potential impacts to below a level of significance. Accordingly, and consistent with the findings of the OMCPU EIR, the Project would have a less-than-significant impact after mitigation. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

HYDROLOGY AND WATER QUALITY

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

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

OMCPU EIR

The OMCPU EIR found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, and would result in substantial alterations to on- and off-site drainage; therefore, the OMCPU EIR found that buildout of the OMCPU would result in potentially significant impacts associated with increased runoff which could exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. The OMCPU EIR identified Mitigation Framework HYD/WQ-1 which generally requires that the design and function of future projects do not impact downstream drainage patterns. Mitigation Framework HYD/WQ-2 also was identified, and requires that future projects be sited and designed to minimize impacts on receiving waters in order to reduce pollutants and mitigate impacts in accordance with the Stormwater Requirements. The OMCPU EIR found with implementation of Mitigation Frameworks HYD/WQ-1 and HYD/WQ-2, impacts due to the creation of runoff water which would exceed stormwater drainage system capacity or provide substantial additional sources of polluted runoff would be less than significant.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project generally conforms to the land use configurations and intensities identified in the OMCPU, although some changes are proposed. Specifically, and in comparison to the land uses evaluated in the OMCPU EIR, the Project would result in a reduction of ~~761~~ 283 multi-family dwelling units, an increase in community commercial space by 107,000 s.f., and a reduction[1] of ~~16.2~~ 2.06 acres of active park space. Additionally, the Project would result in a slight increase in areas subject to impact and development by 1.0 acre as compared to what was assumed by the OMCPU EIR. The 1.0 acre results from the proposed conversion of land designated by the OMCPU for open space to "Residential – Medium to Medium High." Although designated for open space in the OMCPU, City staff determined that the OMCPU's designation of 1.0 acre area in the west of the CVSP area was based on mapping associated with the OMCPU EIR which showed this area as native vegetation, whereas this area is actually fully disturbed and contains no natural vegetation.

Future development projects associated with buildout of the Specific Plan would increase impervious surfaces in the Project area, which would lead to increased runoff that could exceed the capacity of existing or planned stormwater drainage systems and/or provide additional sources of polluted runoff. However, future development projects would be required to design storm drain systems that comply with OMCPU policies pertaining to the development of adequate storm drain facilities, including Policies 6.3-1 through 6.3-5, which require future projects to use sustainable infrastructure design to capture and control runoff, improve drainage facilities in conjunction with development projects, implement the City's Master Storm Water System Maintenance Program to ensure storm conveyance facilities remain free of debris that can reduce their capacity, and coordinate with the City engineer to monitor and improve storm water systems in the Project area. (City of San Diego, 2014a, p. PF-5). Additionally, in accordance with the Municipal Storm Water Permit, future development projects would be required to implement BMPs during construction.

In addition to OMCPU Policies 6.3-1 through 6.3-5, the hydrology report prepared for the proposed Project (*Technical Appendix E*) recommends five BMP strategy options to be considered during future site planning efforts, which include 1) incorporating hydromodification and pollutant control requirements in a combined hydromodification/ biofiltration basin at the downstream end of each regional drainage area; 2) implementing hydromodification BMP(s) and downstream pollutant control BMP(s) separately at the downstream end of each regional drainage area; 3) implementing hydromodification controls on each lot with pollutant control BMP(s) at the downstream end of each regional drainage area; 4) implementing both hydromodification and pollutant control BMPs on each lot; and 5) implementing controls in any of the four strategies and participation in alternative compliance to minimize on-site impacts. (PDC, 2016, p. 7) The proposed CVSP also includes drainage standards that require future implementing projects to incorporate sustainable infrastructure design (e.g. bioswales) and implement BMPs identified in the proposed Project's hydrology study to reduce stormwater runoff and reduce the potential for polluted runoff (see Section 2.6.2 of the Specific Plan). The drainage-related design standards contained in the CVSP, which are summarized above, include measures to reduce the 50- and 100-year peak flows to pre-development conditions, and to incorporate other measures, including LID measures, to reduce potential impacts to existing and planned storm drainage facilities to less-than-significant levels.

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

Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with increased runoff which could exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

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

OMCPU EIR

The OMCPU EIR disclosed that buildout in accordance with the OMCPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties within the Otay and Tijuana River Valley drainage basins. Therefore, implementation of the OMCPU was determined to have the potential to result in significant direct and indirect impacts to the natural drainage system. (City of San Diego, 2014b, p. 5.7-25) The OMCPU EIR also found that buildout of the OMCPU would result in an increase in impervious surfaces and associated increased runoff, which could in turn result in increased risks of erosion hazards on- and off-site. (City of San Diego, 2014b, p. 5.7-26) The OMCPU EIR identified Mitigation Framework HYD/WQ-2, which among other measures requires a reduction in impervious surfaces; avoidance of areas particularly susceptible to erosion and sediment loss; and compliance with the RWQCB and NPDES requirements. Additionally, the OMCPU EIR noted that all future development within the OMCPU would be subject to the City's Storm Water Standards as well as applicable General Plan and OMCPU policies related to erosion hazards. Compliance with the required mitigation was found to reduce impacts to less-than-significant levels. (City of San Diego, 2014b, p. 5.7-30)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, and consistent with the conditions that existed at the time the OMCPU EIR was certified, the Project site's existing topography contains gently sloping

areas with portions of the southern and northern perimeters of the property containing steep canyon areas. As indicated in the Preliminary Hydrology Study prepared for the Project (*Technical Appendix E*), under existing conditions the majority of storm water flows drain southwest to Wruck Creek located west of the existing Cactus Road/Siempre Viva Road intersection. A large portion of the Project site located north of Airway Road drains to the northwest to the north tributary of Spring Canyon. The portion of the Project site located northeast of the Airway Road/Cactus Road intersection drains to the northwest into a storm drain facility located underneath Cactus Road, which eventually drains to the upstream point of North Canyon. (PDC, 2016, p. 3)

Under the proposed Project, and as required by Chapter 2.6 of the CVSP, runoff from the developed Project site would be directed toward a series of detention basins to be constructed within the Project site, which would then be directed via storm drain facilities to outfall locations in Spring Canyon as occurs under existing conditions, as shown in the Preliminary Hydrology Study's *Conceptual Drainage Plan* (see Exhibit B of *Technical Appendix E*). As noted in the Preliminary Hydrology Study, the final storm drain design would not occur until the time of site-specific implementing development projects.

Future implementing projects would be required to comply with OMCPU EIR Mitigation Framework HYD/WQ-2, which includes requirements to reduce potential sedimentation impacts. Future development within the Central Village also would be subject to the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), the stormwater regulations other appropriate agencies (e.g., RWQCB), and the City's Municipal Storm Water Permit (Order No. R9-2013-0001). (PDC, 2016, pp. 3-6) Additionally, Subsection 2.6.2 of the CVSP requires that all future implementing developments comply with the following requirements intended to reduce potential erosion and sedimentation impacts:

Design Standard 2.6-5	Detention basins shall be required to reduce the post-development peak flows to predevelopment levels for the 50-year and 100-year storm.
Design Standard 2.6-6	If the detention basins concentrate flows at the upper edge of canyons, care must be taken to ensure that erosion potential is not increased downstream.
Design Standard 2.6-7	While developments in the East watershed requires conformance with the Notice to "All Private Engineers", the West watershed is not subject to the same requirements, but it is subject to the 50-year and 100-year storm detention requirement, as outlined in Design Standard 2.6-5.
Design Standard 2.6-8	The drainage system is obligated to be consistent with the overall goals and design criteria of the Otay Mesa Community Plan Update (CPU) Drainage Study. In particular, the CPU Drainage Study requires detention of post-development peak flows so that runoff is less than or equal to pre-development peak flows for both the 50-year and the 100-year storm.
Design Standard 2.6-9	The drainage system shall conform with the conditions and standards set by the City's "Drainage Design Manual."
Design Standard 2.6-10	The drainage system shall satisfy the requirements of the City's Storm Water Standards Manual.
Design Standard 2.6-11	All projects proposing construction activities including: clearing, grading, or excavation that results in the disturbance of at least one acre total land area, or activity which is part of a larger common plan of development of one acre or greater, shall comply with the appropriate National Pollutant Discharge Elimination System (NPDES) construction permit and pay the appropriate fees. All development within the Specific Plan boundaries shall be subject to future requirements adopted by the City of San Diego to implement the NPDES program. Mitigation measures may include, but are not limited to: on-site retention; covered storage of all outside storage facilities; vegetated swales; monitoring programs; etc.

Design Standard 2.6-12	Incorporate Best Management Practices (BMP) strategies into all future developments as part of site-specific hydrology and water quality studies.

As a result of the above-described measures, and consistent with the findings reached in the OMCPU EIR, implementation of the proposed Project would not substantially alter the existing drainage pattern of the Project site in a manner that would result in substantial impacts on-site or substantial impacts to the Otay or Tijuana River Valley drainage basins off-site. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

The OMCPU EIR disclosed that there are only two areas in the OMCPU area subject to flooding conditions: the northwestern portion of the OMCPU area in the Otay River Valley; and the Otay Mesa Creek, which traverses the mesa in a north-south direction near La Media Road. The OMCPU EIR noted that future development along the floodplain would have the potential to increase flooding on- or off-site. All future projects located within the 100-year flood hazard area along Otay Creek, as identified in the OMCPU drainage study, were found to be subject to the OMCPU Community Plan Implementation Overlay Zone (CPIOZ), which would ensure discretionary review of all future development within these areas. Additionally, the OMCPU noted that Land Development Code § 143.0145 requires that any future development project must be studied to determine the effects to base flood elevations and ensure they would not result in flooding, erosion, or sedimentation impacts on or off-site. Also, the OMCPU EIR concluded all future projects (both ministerial and discretionary) developed in accordance with the OMCPU would be required to be designed satisfactory to the City Engineer to contain the 100-year flow and reduce or eliminate flooding impacts to adjacent properties. Nonetheless, because project-level detail was not proposed and unavailable at the program-level, the OMCPU EIR concluded that projects under the OMCPU would have the potential to alter the course or flow of flood waters. To address this impact, the EIR imposed Mitigation Framework HYD/WQ-1, which includes specific requirements to preclude flood hazards within the OMCPU or downstream areas. Compliance with Mitigation Framework HYD/WQ-1, the City's Storm Water Standards, and General Plan and OMCPU policies would reduce impacts to less-than-significant levels. (City of San Diego, 2014b, pp. 5.7-24 and 5.7-25)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. As noted in the OMCPU EIR and in accordance with the City's 2011 Significance Determination Thresholds, significant impacts associated with altered flow patterns would result if a project-related increase in stormwater flows would increase on- or off-site flooding hazards pursuant to mapped FEMA floodplains (City of San Diego, 2011a, p. 43). The Project site is not located within a mapped FEMA flood zone (City of San Diego, 2014b, Figure 5.7-1); thus, the proposed Project would not result in alterations to the course or flow of flood waters and impacts would be less than significant. Furthermore, future implementing developments would be required to comply with Mitigation Framework HYD/WQ-1 which generally requires that the design and function of future projects do not impact downstream drainage patterns. Moreover, future development within the Central Village would be required to comply with Land Development Code § 143.0145; be designed satisfactory to the City Engineer to contain the 100-year flow and reduce or eliminate flooding impacts to adjacent properties; comply with the City's Storm Water Standards; and demonstrate consistency with applicable General Plan and OMCPU policies related to flood hazards. Additionally, CVSP Design Standard 2.6-4 requires that all implementing developments incorporate detention basins that reduce the post-development peak flows to predevelopment levels for the 50-year and 100-year storm. Based on these considerations, and consistent with the conclusion reached in the OMCPU EIR, the Project would not alter the course or flow of flood waters. Impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would the CVSP create discharges into surface or ground water, or any alteration of surface or ground water quality, including but not limited to temperature, dissolved oxygen, or turbidity?

Would there be increases in pollutant discharges including downstream sedimentation?

OMCPU EIR

The 2014 OMCPU EIR found that future development within the OMCPU area could result in impacts to surface and ground water-quality, and could result in increases in pollutant discharges including downstream sedimentation. However, the OMCPU EIR noted that water quality impacts would be reduced through the required implementation of Low Impact Development (LID) design, the implementation of storm water BMPs, and adherence to all other applicable federal, state, and local regulations. Because specific development proposals were not proposed or evaluated in the OMCPU EIR, the EIR determined that it could not be guaranteed that all future program-level impacts would be avoided or mitigated to below a level of significance. Therefore, the OMCPU EIR identified Mitigation Framework HYD/WQ-2 to reduce surface and ground water quality, and pollutant discharge impacts, which requires future projects be sited and designed to minimize impacts on receiving waters and mitigate impacts in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). All future implementing projects would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. The OMCPU EIR found with implementation of Mitigation Framework HYD/WQ-2, impacts due to discharges into surface or ground water, any alteration of water quality, and increases in pollutant discharge including downstream sedimentation would be less than significant.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project generally conforms to the land use configurations and intensities identified in the OMCPU, although some changes are proposed. Specifically, and in comparison to the land uses evaluated in the OMCPU EIR, the Project would result in a reduction of ~~761~~ 283 multi-family dwelling units, an increase in community commercial space by 107,000 s.f., and a reduction[1] of ~~16.2~~ 2.06 acres of active park space. Additionally, the Project would result in a slight increase in areas subject to impact and development by 1.0 acre as compared to what was assumed by the OMCPU EIR. The 1.0 acre results from the proposed conversion of l land designated by the OMCPU for open space to "Residential – Medium to Medium High"; however, it was determined by City staff that because this area is fully disturbed and contains no natural vegetation, the inclusion of this area in the OMCPU open space category represents a mapping error.

Future development projects associated with buildout of the Specific Plan would result in development that could have the potential to create pollutant discharges that could impact surface and ground water quality, and have the potential to result in increased pollutant discharges including downstream sedimentation. However, OMCPU EIR Mitigation Framework HYD/WQ-2 would apply to all future development within the Central Village, and would ensure compliance with the water quality standards of the City's Storm Water Runoff and Drainage Regulations and the regulations of other agencies (e.g., RWQCB). Despite the slight increase in areas proposed for development under the Project (approximately 1.0 acre), mandatory compliance with State and local regulations and OMCPU EIR Mitigation Framework HYD/WQ-2 would ensure that impacts to water quality and pollutant discharge would be reduced to below a level of significance. Accordingly, and consistent with the findings of the OMCPU EIR, impacts due to discharges into surface or ground water, any alteration of water quality, and increases in pollutants, including downstream sedimentation would be less-than-significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

GEOLOGY AND SOILS

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

OMCPU EIR

The OMCPU EIR found that the OMCPU area contains geologic conditions that could expose people or property to geologic hazards at the project-level; therefore, future development associated with implementation of the OMCPU would result in potentially significant impacts related to geologic hazards. The OMCPU EIR noted that although no Alquist-Priolo Earthquake Fault Zones occur within the OMCPU area, the OMCPU area is subject to moderate to high geologic risk area due to the presence of the La Nación Fault Zone, which is located 2.3 miles west of the CVSP site. Faults in this zone are considered to be potentially active and would subject the OMCPU area to moderate to severe ground shaking. The OMCPU EIR also concluded that the potential for liquefaction and seismically induced settlement on mesa top areas such as the Project site is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. (City of San Diego, 2014b, p. 5.8-6) The OMCPU EIR also disclosed that a complex of deep-seated landslides known as the San Ysidro Landslide is present in the western and southern edges of the OMCPU area. Apparent landslide debris was found to at least 100 feet below the ground surface, placing the bottom of the landslides below present sea level and indicating an ancient and complex history of movement. The OMCPU EIR concluded that assuming compliance with applicable General Plan and OMCPU policies and implementation of Mitigation Framework GEO-1, potential impacts related to geologic hazards would be reduced to below a level of significance. (City of San Diego, 2014b, p. 5.8-15)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. A series of site-specific Geotechnical Report Update Analysis Letters were prepared for the proposed Project by Geocon, Inc. The report is attached as *Technical Appendix C* to this Addendum. The Geotechnical Letters note that the Project site is located east of the Quaternary La Nación fault zone, and west of the unnamed north and northwest trending Quaternary faults identified in the San Diego Seismic Safety Study. However, no faults are mapped that traverse or are trending toward the Project site. The risk associated with ground rupture due to faulting is low and impacts as a result of faulting would be less than significant. The nearest known active fault is the Rose Canyon/Newport-Inglewood Fault Zone located approximately eight miles west of the Project site. Major earthquakes occurring on the Rose Canyon/Newport-Inglewood Fault Zone, or other regional active faults located in southern California area, could subject the site to moderate to severe ground shaking, which is the same conclusion reached by the OMCPU EIR. (Geocon, 2017, June 2016 Letter, p. 2)

The Geotechnical Letters note the potential for liquefaction during a strong earthquake is limited due to relatively clean sandy soils in a loose unconsolidated condition located below the water table. Due to the lack of a permanent, near-surface groundwater table and the dense nature of the underlying Very Old Paralic Deposits, San Diego Formation, and Otay Formation that underlies the site, the risk associated with ground movement hazard in the Central Village area due to liquefaction and seismically-induced settlement is low. (Geocon, 2017, June 2016 Letter, p. 2)

The Geotechnical Letters also note that there are two landslides mapped, one of which is located within the Project boundary. Both landslides are located within the canyon drainage area on the north side of the Project site. The head of one of the landslides is mapped within the open space area within Planning Area 20. This suspected landslide does not pose a risk to the Project as it is adjacent to land designated for open space. The risk associated with ground movement hazard due to landsliding is low. A second landslide is mapped in the canyon hillside northeast of the Project site. This suspected landslide is not located in an area that could impact the Project site, and does not pose a risk to the Project site. Out of an abundance of caution, additional site reconnaissance and review of the suspected landslides was conducted by Geocon, in order to assure that the proposed alignment of the future Airway Road extension would not require slope stabilization due to proximity of the suspected landslides. Geocon determined "that there is not convincing evidence to confirm the presence of the conjectured landslide. . .[and] if the conjectured feature is present, its closest horizontal proximity to the proposed roadway is at least 150 feet and the likelihood of the slide impacting the proposed roadway in this area is low." (Geocon, 2017, January 2017 Letter, pp.

1-2). The additional analysis also noted that slope stabilization of the slopes supporting the extension of Airway Road would not be necessary (Geocon, 2017, January 2017 Letter, p. 2). Geocon did not recommend any mitigation measures for the Project and noted that there are no significant geologic hazards present within the subject area that cannot be either avoided or mitigated, which is consistent with the conclusion of the OMCPU EIR. (Geocon, 2017, June 2016 Letter, pp. 1-3)

In accordance with the OMCPU EIR, future site-specific discretionary actions associated with buildout of the proposed Project would be required to comply with OMCPU EIR Mitigation Framework GEO-1, which requires future implementing projects to adhere to the City's Seismic Safety Study and prepare a site-specific geotechnical report to reduce potential geologic impacts. In addition, GEO-1 requires future projects to implement typical remediation measures, to account for expansive soil. Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with geologic hazards including earthquake faults, ground shaking, liquefaction, and landslides would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Under existing conditions, and consistent with the conditions that existed at the time the OMCPU EIR was certified, the Project site is partially developed with scattered structures associated with agricultural operations, with the majority of the Central Village comprising relatively level land used for dryland crop production (oats). Future land use and circulation modifications associated with development of the Central Village have the potential to result in erosion impacts during near-term construction activities and long-term operation. Each is discussed below.

Construction-Related Activities

Grading activities that would be required to implement future development on the Project site would expose underlying soils, which would increase erosion susceptibility during grading and construction activities. Exposed soils could be subject to erosion during rainfall events or high winds due to the removal of stabilizing vegetation and exposure of these erodible materials to wind and water. Erosion by water would be greatest during the first rainy season after grading (before landscaping becomes established). Erosion by wind would be highest during periods of high wind speeds. With the exception of two canyon landforms associated with the Spring Canyon system located in the southern portion of the site, the property is generally flat and erosion potential is not substantial.

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

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

During grading and other construction activities involving soil exposure or the transport of earth materials, § 142.0101 et seq. of the City of San Diego Municipal Code, which establishes grading regulations, also would apply to implementing development projects (City of San Diego, 2017a, § 142.0101 et seq.). Furthermore, and consistent with the findings of the OMCPU EIR, future implementing projects would be required to prepare a site-specific geotechnical investigation and hydrology study to identify measures needed in the long term reduce erosion at the project level. Compliance with NPDES permit requirements and Municipal Code § 142.0101 et seq. and the preparation of a site-specific geotechnical investigations and hydrology studies would be assured through mandatory compliance with OMCPU EIR Mitigation Framework GEO-2 as part of all future implementing developments within the CVSP area. Consistent with the findings of the OMCPU EIR, mandatory compliance to these regulatory requirements and policies would ensure that water and wind erosion impacts during construction would be less than significant.

Long-Term Operational Activities

Following construction of implementing development projects, wind and water erosion on the Project site would be minimized, as the Project proposes urban land uses and the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Furthermore, future implementing projects would be subject to compliance with the drainage and hydromodification requirements contained in the preliminary hydrologic analysis prepared for the Project (included as *Technical Appendix E* to this Addendum) as well as future site-specific analyses required with future implementing development applications. The hydrologic analysis requires future implementing projects to incorporate Structural Storm Water Best Management Practices (BMPs) to reduce pollutants in stormwater runoff and hydromodification requirements to control runoff volumes and flow durations in accordance with the City's MS4 Permit. In addition, the Specific Plan contains drainage standards that require future implementing projects to incorporate one of the five BMP strategy options contained in the hydrologic study (see Section 2.6.2 of the Specific Plan). Therefore, implementation of the land use and circulation modifications associated with the proposed Project would not significantly increase the risk of erosion on- or off-site in the long term, and impacts would be less than significant.

Conclusion

As indicated in the above analysis of near- and long-term conditions, the land use and circulation modifications associated with the proposed Project would not result in substantial soil erosion or the loss of topsoil during construction or long-term operation of implementing development projects. Accordingly, and consistent with the findings of the OMCPU EIR, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

ENERGY CONSERVATION

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

OMCPU EIR

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

measures, the OMCPU EIR found that long-term operation impacts associated with energy use would be less than significant.

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Although the proposed Project does not involve site-specific development projects, it is reasonable to anticipate that the construction and long-term operation of future development projects associated with buildout of the CVSP would result in impacts to energy supply.

Construction-Related Activities

Grading and construction activities would consume energy through the use of heavy equipment, trucks, and worker traffic. As noted in the OMCPU EIR, it is speculative to quantify constructed-related energy consumption of future development projects. However, future development projects would be subject to the City's Construction and Demolition Debris Deposit Ordinance, which requires future development to prepare waste management plans that target at least 75% waste reduction. In addition, energy use resulting from construction-related activities would be temporary and would involve standard construction equipment and practices; therefore, construction-related activities would not increase fuel-energy consumption above typical rates. As such, the proposed Project would not result in the use of excessive amounts of fuel or other forms of energy and construction-related impacts would be less than significant.

Long-Term Operational Activities

As previously noted, the proposed Project is the adoption of a plan and does not involve a site-specific development project; therefore, and consistent with the analysis conducted in the OMCPU EIR, impacts to energy resources is based on planned growth within the Project area.

Future implementing projects would be required to meet mandatory energy standards in accordance with Title 24 Building Energy Standards of the California Public Resources Code. In addition, future projects would be required to comply with CVSP Design Standard 2.6-12 and Policies 2.5-4, 2.5-14, 2.5-57 and 2.5-170 which encourage the use of energy efficient lighting, incorporate shade structures to reduce solar heat gain, and incorporate building designs to maximize natural ventilation to take advantage of natural daylight and prevailing breezes, and integrate storm water LIDs and BMPs. Additionally, future projects would result in transportation fuel consumption to transport the Project area's residents, workers, and visitors. According to the Transportation Facilities Trigger Analysis prepared for the Project (see *Appendix G*), the total estimated daily vehicle trips at Project buildout would be 36,354 external daily trips. However, future development projects would be required to comply with Specific Plan policies that are intended to improve walkability (Specific Plan Policies 2.5-6, 2.5-15, 2.5-17, 2.5-20, and 2.5-22), expand public transit facilities and encourage transit use in the Project area (Specific Plan Section 2.3.2.1), and encourage bicycle use in the Project area (Specific Plan Design Standard 2.3-18, and Policy 2.5-20). Adherence to the Specific Plan policies associated with enhancing walkability throughout the Project area would likely reduce the estimated daily vehicle trips, thereby reducing transportation fuel consumption.

Conclusion

As indicated in the above analysis of near- and long-term conditions, the proposed Project would not result in the use of excessive amounts of fuel or other forms of energy during construction or long-term operation of the Project. Accordingly, and consistent with the findings of the OMCPU EIR, impacts would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. In addition, future projects would be required.

NOISE

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

OMCPU EIR

The OMCPU EIR noted that the OMCPU area has the potential to expose noise-sensitive uses to noise levels in excess of standards established in the City's General Plan or Noise Abatement and Control Ordinance ("Noise Ordinance"; Section 59.5.0101 et seq. of the City's Municipal Code) (City of San Diego, 2017a). The EIR noted that mandatory compliance with federal, state, and local regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Abatement and Control Ordinance. The EIR also imposed Mitigation Framework NOI-1 and NOI-2, which requires regulatory compliance would ensure that impacts related to exterior and interior noise are reduced; however, even with strict adherence to the Mitigation Framework, the OMCPU EIR concluded that these impacts cannot be reduced to below a level of significance and therefore concluded that the impacts would remain significant and unavoidable. (City of San Diego, 2014b, pp. 5.10-12 through 5.10-20)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Adoption of the proposed CVSP would alter the land use mix and lower the traffic volumes that were assumed for the Central Village by the OMCPU. Also, due to the land use changes and knowledge of the CVSP's proposed street pattern inside the Central Village (which was not known at the time of OMCPU approval), the directional distribution of traffic generated by development in the Central Village would slightly change from that reported in the OMCPU FEIR. According to the CVSP's Transportation Facilities Trigger Analysis (Chen Ryan, 2017), the CVSP would generate up to 36,345 average daily vehicular trips, which is less traffic than was assumed for the Central Village by the OMCPU EIR, at ~~45,429~~ 41,109 daily trips. Even though traffic volumes would be less with approval of the CVSP, an analysis was conducted by Ldn Consulting, Inc. (Ldn) (*Technical Appendix F)* to determine if approval of the CVSP would result in the exposure of noise-sensitive receptors to transportation noise levels that would exceed City standards. To quantify future noise levels with adoption of the CVSP compared to future noise levels that were reported in the OMCUP EIR, Ldn Consulting calculated the comparative noise levels. For a more detailed description regarding the definition utilized within this analysis to quantify a significant increase in ambient noise, please refer to Noise Study *(Technical Appendix F)* Section 6.1, *Traffic Noise*. (Ldn, 2017c, pp. 22-23)

The future transportation noise contours for the proposed CVSP are shown graphically in Figure 10, *Future (OMCPU as Amended by the CVSP) Transportation Noise Contours*. The changes in traffic noise levels between the adopted OMCPU and the proposed Project (OMCPU as amended to account for the CVSP) traffic volumes are shown in Table 13, *Change in Adopted (OMCPU) and Future (OMCPU as amended by the CVSP) Modeled Noise Levels (dBA at 100 feet)*. As shown in Table 13, changes in future noise levels along studied roadways would range between -2 dB(A) and +10 dB(A). Based on the results shown in Table 13, the CVSP would cause traffic noise levels to decrease along 17 road segments, stay the same along 19 road segments, and increase by +1 dB(A) or + dB(A) along nine roadways segments compared to the noise levels reported in the OMCPU EIR. Decreases in noise levels, no changes in noise levels, and increases in noise levels of less than +3 dB(A) are considered to be less than significant differences. Along the segment of Beyer Boulevard between Old Otay Mesa Road and Caliente Avenue, the CVSP would cause future projected noise levels to increase by +10dB(A) and along Cactus north of Siempre Viva Road, the CVSP would cause future projected noise levels to increase by + 3 dB(A), which are potentially significant noise level increases if these increases affect sensitive noise receivers. (Ldn, 2017c, p. 29)

For the segment of Beyer Boulevard between Old Otay Mesa Road and Caliente Avenue, the noise impact analysis prepared for the OMCPU EIR determined that with buildout of the OMCPU (including the Central Village as originally envisioned by the OMCPU), planned residential uses along this portion of Beyer Boulevard would be exposed to noise levels exceeding 60 dBA. Similarly, for the segment of Cactus Road north of Siempre Viva Road, the noise impact analysis prepared for the OMCPU EIR determined that with buildout of the OMCPU (including the Central Village as originally envisioned by the OMCPU), planned residential and park uses along this portion of Cactus Road would be exposed to noise levels exceeding 60 dBA. Consistent with the conclusion drawn by the OMCPU EIR, implementation of the proposed CVSP Project would contribute to significant impacts to the above

Table 13 Change in Adopted (OMCPU) and Future (OMCPU as amended by the CVSP) Modeled Noise Levels (dBA at 100 feet)

Roadway	Segment	Existing CNEL	Future CNEL	Change
Airway Road	Old Otay Mesa Rd to Caliente Ave	68	66	-2
	Caliente Ave to Heritage Rd	73	71	-2
	Heritage Rd to Cactus Rd	71	73	+2
	Cactus Rd to Britannia Blvd	72	72	0
	Britannia Blvd to La Media Rd	71	71	0
	La Media Rd to Harvest Rd	73	71	-2
	Harvest Rd to Sanyo Ave	72	70	-2
Beyer Boulevard	Alaquinas Dr to Old Otay Mesa Rd	68	69	+1
	Old Otay Mesa Rd to Caliente Ave	61	71	**+10**
Britannia Boulevard	Otay Mesa Rd to SR-905	68	68	0
	SR-905 to Airway Rd	78	79	+1
	Airway Rd to Siempre Viva Rd	76	78	+2
	Siempre Viva Rd to South End	76	75	-1
Cactus Road	Otay Mesa Rd to Airway Rd	72	73	+1
	Airway Rd to Siempre Viva Rd	70	73	**+3**
Caliente Avenue	Otay Mesa Rd to SR-905	69	69	0
	SR-905 to Airway Rd	71	70	-1
	Airway Rd to Beyer Blvd	72	72	0
	Beyer Blvd to Siempre Viva Rd	72	71	-1
Camino Maquiladora	Pacific Rim Ct to Cactus Rd	61	62	+1
	Cactus Rd to Continental St	61	61	0
Heritage Road	Avenida De Las Vistas to Datsun St.	75	75	0
	Datsun St to Otay Mesa Rd	73	73	0
	Otay Mesa Rd to SR-905	69	70	+1
	SR-905 to Airway Rd	74	72	-2
La Media Road	Aviator Rd to Otay Mesa Rd	80	75	-5
	Otay Mesa Rd to SR-905	79	78	-1
	SR-905 to Airway Rd	80	79	-1
	Airway Rd to Siempre Viva Rd	76	76	0
Ocean View Hills Pkwy	Dennery Rd to Del Sol Blvd	71	70	-1
	Del Sol Blvd to Street "A"	72	71	-1
	Street "A" to Otay Mesa Rd	69	69	0
Otay Mesa Road	Caliente Ave to Corporate Center Dr	75	75	0
	Corporate Center Dr to Innovative Dr	72	74	+2
	Innovative Dr to Heritage Rd	73	73	0
	Heritage Rd to Cactus Rd	76	76	0
	Cactus Rd to Britannia Blvd	74	74	0
	Britannia Blvd to Ailsa Ct	75	74	-1
	Ailsa Ct to La Media Rd	74	74	0
	La Media Rd to Piper Ranch Rd	73	74	+1
Siempre Viva Rd	Cactus Rd to Britannia Blvd	72	71	-1
	Britannia Blvd to La Media Rd	73	72	-1
	La Media Rd to Harvest Rd	71	71	0
	Harvest Rd to Otay Center Dr	71	71	0
	Otay Center Dr to SR-905	73	73	0
St Andrews Avenue	Otay Mesa Center Rd to La Media Rd	82	82	0
Street A	Ocean View Hills Pkwy to Otay Mesa Rd	85	84	-1

(Ldn, 2017c, Table 8)

above-referenced segments of Beyer ~~Avenue~~ Boulevard and Cactus ~~Avenue~~ Road. The OMCPU EIR concluded that noise impacts to residential and/or park uses along these and other road segments would be significant and potentially unavoidable. Thus, implementation of the proposed Project would result in a similar significant and unavoidable impact, and would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017c, p. 29)

In regards to on-site land uses, the proposed CVSP designates development areas for residential uses where traffic-related noise levels would exceed the City's noise level compatibility standards (i.e., proposed residential uses adjacent to Airway Road, Cactus Road, and SR-905, as reported in the OMCPU EIR and substantiated in ~~this report~~ *Technical Appendix F*). Typical residential construction in California, conducted in compliance with the California Building Standards Code, provides approximately 10 to 15 dBA of noise reduction from exterior noise sources with windows partially open, and approximately 20 to 25 dBA of noise reduction with windows closed. Thus, as a rule of thumb, where exterior noise levels are below 65-dBA CNEL, interior noise levels for new construction would typically meet the interior 45-dBA CNEL standard for residential uses established in the California Code of Regulations, Title 24. (Ldn, 2017c, p. 29)

Additionally, where exterior noise levels are 65 to 70 dBA CNEL, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. As stated in the OMCPU EIR, where exterior noise levels exceed 70 dBA CNEL, residential units would not normally be able to meet the 45-dBA CNEL interior standard through typical construction methods. Thus, the OMCPU EIR stated that noise-sensitive uses located within the 70 dBA CNEL will require acoustical study at the project-level, and may require enhanced design features, such as windows and doors with higher Sound Transition Class (STC) ratings to meet the 45-dBA CNEL criteria. All development projects that would implement the CVSP (including those with uses that would occur within the 65-dBA CNEL contour (refer to Figure 10)) would be subject to a discretionary review process and evaluated under CEQA, including a requirement for additional site-specific acoustical analysis. Applicable provisions of OMCPU EIR Mitigation Measures NOI-1 and NOI-2 would apply to the proposed Project, which require acoustical study at the implementing project level. Commercial uses developed under the CVSP in mixed-use planning areas would be a compatible use for the future noise levels calculated for these areas. The interior noise level criterion for commercial sales and offices is 50 dBA CNEL. The majority of planned commercial land uses in the CVSP area are located along Airway Road. Noise levels along this roadway would be above 70 dBA CNEL at 100 feet. As noted in the OMCPU EIR, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. Thus, no additional noise reduction measures are needed for the proposed commercial areas on-site beyond those presented in the OMCPU EIR. (Ldn, 2017c, pp. 29-30)

The cumulative study area for traffic-related noise was determined to include those roadway segments throughout the CVSP area and the immediate community that would have an increase in traffic as a result of the CVSP and, thus, a potential increase in noise. However, the proposed CVSP Project would result in fewer daily trips than assumed for the Central Village by the OMCPU EIR; thus, implementation of the CVSP as proposed would have overall reduced cumulatively considerable impacts associated with transportation-related noise as compared to what was disclosed by the OMCPU EIR. Nonetheless, and consistent with the findings of the OMCPU EIR, implementation of the proposed CVSP Project, in conjunction with other cumulative traffic expected upon buildout of the OMCPU and ambient growth, would expose sensitive receptors to significant noise impacts particularly where residential and/or park uses exist or are planned to be located along roadways impacted by noise levels above 65 dB(A). Although mitigation measures, consistent with OMCPU Mitigation Measures NOI-1 and NOI-2, would apply to the proposed Project, transportation-related noise impacts would nonetheless remain cumulatively considerable and unavoidable. This conclusion is consistent with the conclusion reached by the OMCPU EIR. (Ldn, 2017c, p. 30)

Cumulative traffic noise levels (i.e., existing plus future with Proposed Project), were calculated using future traffic volumes from the CVSP/s Transportation Facilities Trigger Analysis (Chen Ryan Associates, 2017) and was presented in Table 13, above. As shown in Table 13, the CVSP would cause traffic noise to increase by 3 dBA or more along two study area road segments: Beyer Boulevard between Old Otay Mesa Road and Caliente Avenue; and Cactus Road north of Siempre Viva Road. Cumulative traffic-related noise levels along Beyer Boulevard would expose future residential uses in the Southwest Village portion of the OMCPU to noise levels exceeding City

thresholds of significance. Cumulative traffic-related noise levels along Cactus Road north of Siempre Viva Road would expose off- site recreational uses (i.e., Grand Park) to unacceptable noise levels, and also would expose proposed on-site residential uses abutting Cactus Road to noise levels exceeding the City's land use compatibility guidelines. Thus, and consistent with the conclusions of the OMCPU EIR, even with the incorporation of mitigation measures, impacts to sensitive receptors abutting the Beyer Boulevard or Cactus ~~Avenue~~ Road roadway segments would be cumulatively considerable and unavoidable. (Ldn, 2017c, p. 31)

Could the proposed collocation of residential and commercial or industrial land uses result in the exposure of people to noise levels which exceed the City's Noise Abatement and Control Ordinance?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The Project's Noise Study (*Technical Appendix F*) noted that the generation of noise from certain types of land uses in the CVSP area would cause potential land use incompatibility. A project which would generate noise levels at the property line which exceed Section 59.5.0401 of the City's Municipal Code is considered potentially significant. Section 59.5.0401 of the City's Noise Ordinance sets the operational exterior noise limit for commercial uses at 65 dBA Leq for daytime hours of 7 a.m. to 7 p.m. and 60 dBA Leq during the noise sensitive nighttime hours of 7 p.m. to 7 a.m. Although commercial uses permitted in the CVSP's mixed-use planning areas are expected to only operate during the daytime hours, there is still a potential that businesses may operate during nighttime or early morning hours and therefore the most restrictive and conservative approach is to apply the 60 dBA Leq nighttime standard at the property lines. Development projects that would be implemented pursuant to the CVSP would result in the collocation of residential and recreational land uses with commercial uses (i.e., within and adjacent to the mixed-use portions of the CVSP area). The noise levels that have the potential to be generated by commercial uses within the mixed-use land use designations within the CVSP could expose nearby noise-sensitive land uses (e.g., residential units and parks) to noise levels that may exceed the noise level limits specified in the City's Noise Ordinance. Additionally, the Project also would introduce residential and recreational land uses in the northern and southern portions of the site in close proximity to existing or planned off-site light and/or heavy industrial land uses. The noise levels that have the potential to be generated by off-site industrial uses could expose noise-sensitive land uses within the CVSP (e.g., residential units) to noise levels that may exceed noise level limits specified in the City's Noise Ordinance. (Ldn, 2017c, pp. 31-32)

The juxtaposition of future land uses within the CVSP could result in significant noise impacts to sensitive receptors on-site. This potential was acknowledged by the OMCPU EIR. While the City's applicable regulations and policies would reduce direct and indirect impacts associated with the generation of noise levels in excess of standards established in the General Plan or Noise Ordinance, no project level site plans are proposed as part of the CVSP. Without detailed operational data and site plans for the land uses within each CVSP planning area, it cannot be verified if future projects would be capable of reducing noise levels to comply with City standards. As the degree of success cannot be adequately known for specific projects at a program level of analysis, consistent with the conclusion drawn by the OMCPU EIR, mitigation would be required to provide verification that City standards have been met for operational noise. As a result, and consistent with the findings of the OMCPU EIR, this impact is potentially significant. Noise attenuation measures, consistent with OMCPU EIR Mitigation Measure NOI- 3, which requires a site-specific acoustical/noise analysis to be prepared, and if required, identify site specific mitigation measures would be implemented; however, and consistent with the conclusions reached by the OMCPU EIR, even with strict adherence to the required mitigation, impacts associated with collocation of residential, commercial, and light/heavy industrial land uses has the potential to remain significant and unavoidable. There is no

aspect of the CVSP that would worsen the level of impact compared to the potential impacts disclosed in the OMCPU EIR. Accordingly, and consistent with the conclusion reached in the OMCPU EIR, impacts due to collocation residential and commercial/land uses resulting in noise exposure that would exceed the City's Noise Ordinance would be significant and unavoidable. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017c, p. 32)

Would the CVSP result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. As stated in the Project's Noise Study (*Technical Appendix F*), the Project site is located outside of the 60-65 dB CNEL contour area, which is the noise level standard established in the land use compatibility guidelines, for both Brown Field and the General Abelardo L. Rodriguez International Airport, indicating that the Project site is not exposed to airport-related noise levels exceeding 60 dB CNEL (Ldn, 2017c, pp. 16, 31). Thus, the CVSP would not result in the exposure of people to current or future noise levels which exceed standards established in the land use compatibility guidelines in the Brown Field Municipal Airport Land Use Plan Compatibility Plan. Accordingly, and consistent with the conclusion reached in the OMCPU EIR, impacts due to airport-related noise would be less than significant. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project generally conforms to the development area identified in the OMCPU for the CVSP, although some changes to the land uses are proposed as part of the CVSP Project, as compared to the land uses identified in the OMCPU for the CVSP. Specifically, and in comparison to the land uses evaluated in the OMCPU EIR, the Project would result in a reduction of ~~761~~ 283 multi-family dwelling units, an increase in community commercial space by 107,000 s.f., and a reduction[1] of ~~16.2~~ 2.06 acres of active park space. As such, it can be reasonably assumed that construction of the proposed Project would result in the same or slightly reduced noise levels as compared to what was disclosed by the OMCPU EIR for the Central Village. (Ldn, 2017c, p. 4)

Although construction noise would be localized to discrete locations during construction, businesses, residences, recreational facilities, and noise-sensitive wildlife species using open space areas in and around the CVSP area could be intermittently exposed to temporary elevated levels of noise throughout the construction period. Specifically, the OMCPU EIR indicated that ~~coastal California gnatcatcher (~~CAGN~~)~~ occupying habitat in the ~~Multiple Species Habitat Area (~~MHPA~~)~~ could be adversely impacted by temporary construction noise if construction occurs during the breeding season. Therefore, adoption of the proposed CVSP with its potential to directly and indirectly affect the CAGN by construction noise does not represent a new impact. Consistent with the findings of the OMCPU EIR, this is a potentially significant impact to humans and potentially to wildlife (CAGN in particular) due to the potential for high short-term and instantons noise levels during peak construction activity. Due to the potential for high short-term and instantaneous noise levels during peak construction activity at nearby residential properties, future implementing development within the Central Village would be required to comply with OMCPU EIR Mitigation Framework NOI-4, which requires the preparation of a Construction Noise Mitigation Plan to reduce noise levels associated with construction and OMCPU Mitigation Framework LU-2, which requires all development projects adjacent to MHPA areas comply with the Land Use Adjacency Guidelines of the MSCP in terms of noise. However, and consistent with the findings of the OMCPU EIR, even with the application of Mitigation Frameworks NOI-4 and LU-2, construction noise impacts cannot be reduced to below a level of significance. Implementation of the Project would not exacerbate construction-related impacts beyond what was evaluated and disclosed in the OMCPU EIR; therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017c, pp. 33-36)

PALEONTOLOGICAL RESOURCES

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

OMCPU EIR

The OMCPU EIR found that the OMCPU area contains geologic structures with moderate and high sensitivity potential for paleontological resources; therefore, implementation of the OMCPU was determined to result in a potentially significant impact to paleontological resources. The OMCPU EIR identified Mitigation Framework PALEO-1 to reduce potential impacts, which generally requires future development projects to monitor for paleontological resources during construction activities and to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. The OMCPU EIR found that with implementation of Mitigation Framework PALEO-1, program-level impacts related to paleontological resources would be reduced to below a level of significance. (City of San Diego, 2014b, pp. 5.11-5 through 5.11-9)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. According to the OMCPU EIR, the Project site primarily contains geology with moderate sensitivity potential for paleontological resources, although the drainages surrounding the Central Village are identified with a high sensitivity potential (City of San Diego, 2014a, Figure 5.11-2). Therefore, ground-disturbing construction activities associated with future implementing development projects would have the potential to result in significant impacts to paleontological resources. However, and as

disclosed in the OMCPU EIR, future development projects within the Central Village would be subject to Mitigation Framework PALEO-1, which requires future development projects to monitor for paleontological resources during construction activities and to be designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Compliance with Mitigation Framework PALEO-1 would ensure that future construction activities associated with the site-specific buildout of the proposed Project do not adversely affect paleontological resources. Accordingly, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impacts to paleontological resources at the program-level. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

TRANSPORTATION/CIRCULATION

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis: In order to evaluate the proposed Project's potential to impact the surrounding circulation network in ways not previously disclosed in the OMCPU EIR, a program-level Transportation Facility Trigger Analysis (TFTA) was prepared for the proposed Project, the results of which are presented in *Technical Appendix G*. Refer to *Technical Appendix G* for a discussion of the methodology used to evaluate the Project's potential traffic impacts.

Implementation of the proposed Project would generate fewer daily and peak hour traffic trips compared to the number of trips that would have been generated under the buildout assumed for the Central Village area by the OMCPU EIR. The OMCPU EIR assumed the following land uses within Otay Mesa Central Village Specific Plan Area: (Chen Ryan, 2017, p. 27)

- ~~5,246~~ 4,768 multi-family dwelling units (<20 ac/du)
- 32.7 ksf of community commercial
- ~~32.3~~ 18.16 acres of active park space
- 1 elementary school

In comparison, the Project is proposing to change the land use designations within the Otay Mesa Central Village Specific Plan Area to the following: (Chen Ryan, 2017, p. 27)

- 425 multi-family dwelling units (<20 du/ac)

- 4,060 multi-family dwelling units (>20 du/ac)
- 139.7 ksf of community commercial
- 16.1 acres of active park space
- 1 elementary school (K-8)

In summary, and in comparison to the land uses assumed for the site by the OMCPU EIR, implementation of the proposed Project would result in:

- A reduction of ~~761~~ 283 multi-family dwelling units;
- An increase of 107,000 s.f. of community commercial space; and
- A reduction[1] of ~~16.2~~ 2.06 acres of active park space.

Table 14, *Central Village Trip Generation – OMCPU Land Uses*, shows the calculated trip generation for the Central Village as evaluated in the OMCPU EIR. As shown, the Central Village was calculated to generate a total of ~~45,429~~ 41,109 external daily trips, including ~~3,876~~ 3,558 (~~1,038~~ 967 in / ~~2,838~~ 2,591-out) AM peak hour trips and ~~4,287~~ 3,905 (~~2,831~~ 2,574-in / ~~1,456~~ 1,331-out) PM peak hour trips. Table 15, *Central Village Trip Generation – Proposed Project Land Uses*, shows that implementation of the proposed CVSP would result in the generation of 36,354 external daily trips, including 2,808 (876-in / 1,931-out) AM peak hour trips and 3,545 (2,201-in / 1,345-out) PM peak hour trips. Accordingly, traffic generated by the proposed CVSP would be reduced by approximately ~~20%~~ 7% as compared to the number of trips disclosed in the OMCPU EIR. It can thus reasonably be concluded that although the proposed Project would make a cumulatively considerable contribution to significant and unavoidable impacts to the same four roadway segments, 39 intersections, five SR-905 freeway segments, and five metered freeway on-ramp locations as identified in the OMCPU EIR, the Project's contribution of traffic to these facilities would be reduced as compared to what was evaluated and disclosed in the OMCPU EIR. Additionally, Mitigation Framework TRF-1 would apply to all future development within the Central Village, and requires improvements to intersections throughout the OMCPU area in accordance with OMCPU EIR Figure 5.12-4. Additionally, and in accordance with Subsection 3.10, *Phasing*, of the CVSP, all future implementing development projects within the Central Village would be required to prepare a project-level traffic study to identify the transportation and circulation improvements needed to ensure that impacted transportation facilities operate at acceptable levels of service, and to determine whether each implementing development would result in significant and unavoidable traffic impacts not identified by the OMCPU EIR due to site-specific conditions or actual phasing of development. The recommended improvements that would be identified in the project-level traffic study also would be included as site-specific conditions of approval and/or mitigation measures imposed on each implementing development project.

Accordingly, because implementation of the Project would result in approximately ~~20%~~ 7% less traffic than what was assumed by the OMCPU EIR, Project impacts to traffic may be reduced in comparison to what was disclosed in the OMCPU EIR. Further, all implementing development projects within the CVSP area are required to be analyzed by site-specific traffic studies, would be required by City conditions of approval to implement site-specific traffic improvements, and would be subject to CEQA compliance, and site-specific mitigation measures for traffic impacts. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

The OMCPU EIR found that roadway improvements associated with the buildout of the OMCPU would be constructed in accordance with City design standards and applicable OMCPU policies. Therefore, the OMCPU EIR concluded that impacts associated with traffic hazards for motor vehicles, bicyclists, and pedestrians would be less than significant. (City of San Diego, 2014b, pp. 5.12-48 and 5.12-49)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. Roadway improvements proposed by the Project are consistent with the City's Street Design Manual and applicable OMCPU policies, and all roadways to be improved as part of

Table 14 Central Village Trip Generation – OMCPU Land Uses

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Multi-Family (Under 20 DU/acre)	~~5,246~~ 4,768 DU	8	~~41,968~~ 38,144	8%	~~3,357~~ 3,052	2:8	~~671~~ 610	~~2,686~~ 2,442	9%	~~3,777~~ 3,433	7:3	~~2,644~~ 2,403	~~1,133~~ 1,030
Community Commercial [a]	32.7 KSF	70	2,289	4%	92	6:4	55	37	11%	252	5:5	126	126
Park (Developed)	~~32.3~~ 18.16 Acres	50	~~1,615~~ 908	4%	~~65~~ 36	5:5	~~32~~ 18	~~33~~ 18	8%	~~129~~ 73	5:5	~~65~~ 36	~~64~~ 36
Elementary School	13.1 Acres	136	1,782	31%	552	6:4	331	221	19%	339	4:6	135	204
Total			~~47,654~~ 43,123		~~4,066~~ 3,732		~~1,089~~ 1,014	~~2,977~~ 2,718		~~4,497~~ 4,096		~~2,970~~ 2,700	~~1,527~~ 1,396
Internal Trips Capture (4.67%)[b]			~~2,225~~ 2,014		~~190~~ 174		~~51~~ 47	~~139~~ 127		~~210~~ 191		~~139~~ 126	~~71~~ 65
External Trips			~~45,429~~ 41,109		~~3,876~~ 3,558		~~1,038~~ 967	~~2,838~~ 2,591		~~4,287~~ 3,905		~~2,831~~ 2,574	~~1,456~~ 1,331

Source: City of San Diego Land Use Code – Trip Generation Manual, May 2003

Notes:
a – consistent with Otay Mesa CPU land use assumption.
b - Internal Capture derived from SANDAG Select Zone A output, included in Appendix B.

(Chen Ryan, 2017, Table 4.1)

Table 15 Central Village Trip Generation – Proposed Project Land Uses

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Multi-Family (Under 20 DU/acre)	425 DU	8	3,400	8%	272	2:8	54	218	10%	340	7:3	238	102
Multi-Family (Over 20 DU/acre)	4,060 DU	6	24,360	8%	1,949	2:8	390	1,559	9%	2,192	7:3	1,535	657
Community Commercial	139.7 KSF	70[a]	9,779	3%	293	6:4	176	117	10%	978	5:5	489	489
Park (Developed)	16.1 Acres	50	805	4%	32	5:5	16	16	8%	64	5:5	32	32
Elementary School	13.1 Acres	136	1,782	31%	552	6:4	331	221	19%	339	4:6	135	204
Total			**40,126**	-	**3,099**	-	**967**	**2,132**	-	**3,913**	-	**2,429**	**1,484**
Internal Trips Capture (9.4%)[b]			**3,772**	-	**291**	-	**91**	**200**	-	**368**	-	**228**	**140**
External Trips			**36,354**	-	**2,808**	-	**876**	**1,931**	-	**3,545**	-	**2,201**	**1,345**

Source: Colrich, October 2015; City of San Diego Land Development Code – Trip Generation Manual, May 2003

Notes:
a – Trip generation rate used is consistent with the Otay Mesa CPU.
b - Internal Capture derived from SANDAG Select Zone B output.

(Chen Ryan, 2017, Table 3.2)

the Project within the Central Village would be improved to be consistent with the roadway classifications presented in the OMCPU. Additionally, the Project's future development permits would be reviewed by the City of San Diego for conformance with the Street Design Manual, which would ensure traffic hazards would be less-than-significant. Furthermore, the future site-specific discretionary actions associated with the buildout of the proposed Project would be conditioned to comply with the design standards and policies in the Specific Plan's Mobility Element (Section 2.3) which would ensure traffic hazards for motor vehicles, bicyclists, and pedestrians would be less-than-significant. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated with increasing traffic hazards for motor vehicles, bicyclists, and pedestrians. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project would not make alterations to present circulation movements in the area, and no existing emergency access points are located in the Project area. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have a less-than-significant impact associated with altering circulation and emergency access on the Project site. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The proposed Project would implement the goals and policies of the OMCPU with respect to alternative modes of transportation. Additionally, the Project's future development permits and subdivision map applications would be reviewed by the City for conformance with applicable goals and policies of the General Plan, OMCPU, and all applicable ordinances, policies, and plans related to alternative transportation modes. Furthermore, the future site-specific discretionary actions associated with buildout of the proposed Project also would be conditioned to comply with all applicable plans supporting alternative transportation. Finally, the future site-specific discretionary actions associated with the buildout of the proposed Project would be conditioned to comply with the design standards and policies in the Specific Plan's Mobility Element (Section 2.3), which support alternative transportation modes, and are in conformance with the adopted plans, policies, and programs supporting alternative transportation modes. Thus, the Project would comply with adopted policies, plans, and programs supporting alternative transportation modes, and a less-than-significant impact would occur. Accordingly, and consistent with the finding of the OMCPU EIR, the proposed Project would have no impact associated with a conflict with an applicable plan, policy, or program supporting alternative transportation modes nor would the Project otherwise decrease the performance or safety of such facilities. Therefore,

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

PUBLIC SERVICES

In order to maintain acceptable service ratios, response times, or other performance objectives, would the CVSP promote growth patterns resulting in the need for the provisions of new or altered public facilities, the construction of which could cause significant physical impacts?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. As previously indicated, the Project proposes a refined land use plan for the Central Village. In comparison to the land uses evaluated in the OMCPU EIR, the Project would result in the following changes:

- A reduction of ~~761~~ 283 multi-family dwelling units;
- An increase of 107,000 s.f. of community commercial space; and
- A reduction[1] of ~~16.2~~ 2.06 acres of active park space.

As noted in the OMCPU EIR, buildout of the OMCPU, including the Central Village, would increase demand for all public facilities. The proposed Project's impacts on public services, including fire protection, police protection, schools, parks, and other public facilities are discussed below:

Fire Protection

Buildout of the proposed Project would increase demand for fire protection and would contribute to the need for new or altered facilities. The OMCPU EIR disclosed that under existing conditions, fire services in the Project area currently re provided by Fire Station No. 29, located approximately 2.7 miles to the west of the Project site. As noted in the OMCPU EIR, one new firefighter is needed for every 1,000 persons. Buildout of the Central Village as proposed by the CVSP would result in a future population of 15,473 residents, which would result in the need for up to 15 new firefighters. (City of San Diego, 2014b, p. 5.13-21)

The OMCPU EIR also notes that there are two new fire stations planned to serve the OMCPU area. A new fire station (No. 49) is planned at the northwest corner of Otay Mesa Road and Ocean View Hills Parkway, while another approximately 10,000 square foot combined fire and police rescue facility is planned approximately 0.5 mile east of the Project site at the intersection of Siempre Viva Road and Britannia Boulevard. (City of San Diego, 2014b, p. 5.13-2) As noted in the OMCPU EIR, all future development within the Central Village would be subject to payment of Public Facilities Financing Plan (PFFP) fees, portions of which will be used by the City to construct the fire station as the need arises. Although the proposed Project would increase the demand for fire protection services, and consistent with the findings of the OMCPU EIR, the construction and operation of new public facilities would be subject to separate environmental review and payment of applicable fees. Therefore, at the program-level of analysis, impacts associated with the need for new or expanded fire protection facilities would be less than significant. (City of San Diego, 2014b, p. 5.13-21)

Police Protection

Buildout of the proposed Project would increase demand for police protection and would contribute to the need for new or altered facilities. The city-wide staffing ratio for police officers to population is 1.45 officers per 1,000 residents. Implementation of the CVSP would result in a future population of approximately 15,473 residents, which would generate a demand for up to 23 new police officers. (City of San Diego, 2014b, p. 5.13-22)

According to the OMCPU EIR, the construction of a 10,000 square foot combined fire and police rescue facility located approximately 0.5 miles east of the Project site is planned to meet acceptable service levels in the Project area. As noted in the OMCPU EIR, all future development within the Central Village would be subject to payment of Public Facilities Financing Plan (PFFP) fees, portions of which will be used by the City to construct the combined police and fire rescue facility as the need arises. Although the proposed Project would increase the demand for police protection services, and consistent with the findings of the OMCPU EIR, the construction and operation of new public facilities would be subject to separate environmental review and payment of applicable fees. Therefore, at the program-level of analysis, impacts associated with the need for new or expanded police protection facilities would be less than significant. (City of San Diego, 2014b, p. 5.13-22)

Schools

Buildout of the proposed Project would result in additional demands on school services and would contribute to the need for new facilities. The proposed Project accommodates the development of a 13.1-acre elementary school site. Although the Project would increase the demand for elementary school facilities, development of the school site would meet the Project's future demand for school services. Construction of the school site is inherent to the proposed Project and has been evaluated herein and in the OMCPU EIR for impacts that could result from construction and operation of the school. Applicable Mitigation Frameworks mitigation from the OMCPU EIR and this Addendum would apply to all future development within the Central Village, and additional mitigation measures may be identified as part of the environmental review process for future implementing development within the Central Village. These measures would reduce, to the maximum feasible extent, the adverse environmental effects associated with construction of the school. Furthermore, future development within the CVSP area would be required to contribute fees in accordance with Senate Bill 50 (SB 50), which would be used to fund the construction of needed facilities. Pursuant to the Leroy F. Greene School Facilities Act of 1998 (SB 50), payment of school impact fees constitutes complete mitigation for ~~Project~~ future implementing development-related impacts to school services. Therefore, at the program level impacts associated with school facilities would be less than significant. (City of San Diego, 2014b, pp. 5.13-22 through 5.13-24)

Parks

Buildout of the proposed Project would result in the demand for new park facilities due to the increased population in the Project area. The proposed Project designates 16.1 acres of land for population-based parks consistent with the OMCPU and 15.9 acres for open space uses. The construction of the park facilities has been evaluated throughout this Addendum and also would be subject to separate environmental review for future implementing development within the Central Village. Moreover, and consistent with the OMCPU, a portion (approximately 27.9 acres) of the Project's parkland demand is intended to be accommodated by the Grand Park, which is located off site and adjacent to the CVSP area at the southeastern corner of Cactus Road and Airway Road. Impacts associated with future buildout of the Grand Park were evaluated in the OMCPU EIR and also will be subject to separate environmental review at the time implementing plans for the Grand Park are proposed. Therefore, at the program-level of analysis, impacts associated with the construction of new park and recreation facilities would be less than significant.

Other Public Facilities

As noted in the OMCPU EIR, the existing Otay Mesa-Nestor Library serves the needs for both the Otay Mesa-Nestor and the Otay Mesa communities. In addition, the San Ysidro Library, located outside the OMCPU area, also is available for the residents of the Otay Mesa community. The OMCPU states that as the community further develops, a library facility would be provided within the OMCPU area. Although the specific location for this facility has not yet been determined, the OMCPU identifies a "Future Library Placeholder" located approximately

2.5 miles northwest of the Project site (City of San Diego, 2014a, PF-8 and Figure 6-1). Although the Project also would increase the demand for library facilities, the proposed library facility has been planned to meet the needs of the projected OMCPU residents and is funded as part of the PFFP. As noted in the OMCPU EIR, all future development within the Central Village would be subject to payment of PFFP fees, portions of which will be used by the City to construct the library facility as the need arises. Thus, ~~the Project~~ future implementing developments within the Central Village would contribute fees towards the cost of constructing the new library facility. Additionally, and consistent with the conclusion reached in the OMCPU EIR, the construction of this facility would be subject to separate environmental review at the time implementing development permits are available and a final site location is identified. Therefore, at the program-level of analysis, impacts associated with the construction of the new library facility would be less than significant.

Summary

As demonstrated above, and consistent with the findings of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impacts associated with the construction of new or expanded public facilities at the program-level. Therefore, at the program-level of analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

UTILITIES AND SERVICE SYSTEMS

Would the CVSP result in a need for new systems, or require substantial alternations to existing utilities, the construction of which would create physical impacts? These systems include water, wastewater, reclaimed water, solid waste disposal, storm water infrastructure, and communication systems.

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

Water

No Substantial Change from Previous Analysis. Under existing conditions, the Project site is located within the City's Public Utilities Department (PUD) and Otay Water District (OWD) service areas; however, as specified in the Water and Sewer Analysis prepared for the Project (see *Technical Appendix H*), the Project proposes to only connect to OWD water facilities. The OWD's water system model was updated in 2010 as part of the 2010 Water Resources Master Plan (WRMP) Update, which included potable water demands anticipated with implementation of the OMPCU. As discussed in the OMCPU EIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-13). The portion of the Project site located east of Heritage Road would receive water service via three direct directions to an existing 10-inch OWD water main underneath Cactus Road and parallel 14-inch and 16-inch mains underneath Airway Road. The portion of the Project site located west of Heritage Road would be served via extensions from the OWD water system located within the existing alignments of Cactus Road and Airway Road. According to the Water and Sewer Analysis

prepared for the Project (*Technical Appendix H*), buildout of the Project is calculated to demand an average of 1.45 million gallons per day (mgd), which would not exceed the capacity of the existing mains within Airway and Cactus Road (Atkins, 2016, p. 4). Additionally, future implementing projects would be required to prepare a Sub Area Water Master Plan (SAMP) specific to the proposed implementing development's project design to ensure proposed water facilities are sited and designed to avoid conflict with existing public utilities.

Additionally, and as noted previously, in comparison to the land uses assumed by the OMCPU EIR, the Project would result in a reduction of ~~761~~ 283 multi-family dwelling units and an increase of 107,000 s.f. of community commercial space. The OWD's Water Resources Master Plan Update indicates that residential uses exceeding eight dwelling units per acre (du/ac) generate a demand for approximately 255 gallons per day (gpd) per dwelling unit, while commercial uses generate a demand for 1,607 gpd/acre. If the commercial retail proposed by the Project were to be developed at a floor area ratio (FAR) of 0.35, which is a reasonable assumption given the high-density nature planned for the Central Village, total land area devoted to commercial uses would be 7.0 acres. Accordingly, the proposed Project would result in a net reduction of 182,806 gpd of water demand as compared to what was assumed for the site by the OMCPU EIR ([-~~761~~ 283 units x 255 gpd/unit] + [7.0 acres x 1,607 gpd per acre] = ~~-182,806~~ 83,414 gpd). (OWD, 2013b, Table 4-27)

Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with water system improvements would be less than significant at the program-level. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Wastewater

No Substantial Change from Previous Analysis. The City of San Diego would provide sanitary sewer service for the entire Project via development of a new on-site sewer collection system and connections to the Otay Mesa Trunk Sewer system. As discussed in the OMCPU EIR, additional wastewater system improvements beyond what have been identified in master planning documents would be required. However, the need for these improvements would not result in significant impacts, because the 2004 OMTS Sewer Master Plan and 2009 Refinement Report previously identified these improvements as required in future phases to accommodate buildout wastewater generation in the area. Additionally, the OMCPU EIR notes that the additional improvements would occur within existing utility line easements and the facilities would not result in significant impacts to the environment. Wastewater from the Project site would flow by gravity to Cactus Road, which flows to Pump Station 23T located near Cactus and Siempre Viva Roads. Pump Station 23T conveys flow to an 18-inch gravity sewer in Otay Mesa Road that currently connects to the City's Otay Valley Trunk Sewer. According to the Water and Sewer Analysis (*Technical Appendix H*) prepared for the Project, the Project is anticipated to require sewer flows of 0.87 mgd (Atkins, 2016, p. 4). Based on these projected flows, the connection to the gravity main in Cactus Road with some minor upgrades, and conveying through Pump Station 23T would provide the necessary sewage capacity for the project until planned upgrades are completed on the City's Otay Mesa Trunk Sewer system (Atkins, 2016, p. 4).

Additionally, and as noted previously, in comparison to the land uses assumed by the OMCPU EIR, the Project would result in a reduction of ~~761~~ 283 multi-family dwelling units and an increase of 107,000 s.f. of community commercial space. As indicated under the above discussion of changes in water demand, the changes proposed as part of the Project as compared to what was evaluated as part of the OMCPU EIR would result in a net reduction of 182,806 gpd. The amount of water demand is proportional to the amount of sewer service demand because potable water comprises the vast majority of wastewater. Therefore, it can reasonably be concluded that the Project would result in a net reduction in demand for sewer services as compared to what was evaluated and disclosed in the OMCPU EIR.

Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with wastewater system improvements would be less than significant at the program-level. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Reclaimed Water

No Substantial Change from Previous Analysis. Under existing conditions, the Project site is located within the City's PUD and OWD service areas; however, the Project proposes to only receive recycled water from OWD water facilities (City of San Diego, 2014b, p. 5.14-18). The OWD currently operates a 1.2-mgd reclamation plant and has an agreement to purchase up to 6 mgd of recycled water from the City. The OWD's 2008 WRMP included recycled water projections under the adopted community plan, and the 2010 WRMP incorporated projections under the OMCPU. The OMCPU area is within the OWD's 860 pressure zone, which will ultimately be supplied from a new 860-1 reservoir through planned 30-inch diameter transmission mains (City of San Diego, 2014b, p. 5.14-18). As discussed in the OMCPU EIR, the 2010 WRMP did not identify storage or pumping deficiencies under buildout of the OMPCU; thus, the 2010 WRMP did not identify any infrastructure improvements associated with implementation of the OMCPU (City of San Diego, 2014b, p. 5.14-18). Improvements to the recycled water systems have been previously identified, and would be required whether or not the OMCPU, including the CVSP, is implemented. There are no changes proposed as part of the Project that would result in new or more severe impacts due to reclaimed water beyond what was evaluated in the OMCPU EIR. Accordingly, and consistent with the finding of the OMCPU EIR, impacts associated with recycled water system improvements would be less than significant at the program-level.

Based on the foregoing analysis, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Solid Waste

No Substantial Change from Previous Analysis. As previously indicated, in comparison to the land uses assumed for the site by the OMCPU EIR implementation of the proposed Project would result in a reduction of ~~761~~ 283 multi-family dwelling units and an increase of 107,000 s.f. of community commercial space. Based on the solid waste generation rates presented in OMCPU EIR Table 5.14-2, the changes proposed by the Project would result in a net decrease in the amount of solid waste generated within the Central Village by ~~4,544.8~~ 3,598.6 pounds per day ([~~-761~~ 283 units x 7.8 pounds/unit/day] + [107,000 s.f. x 13 pounds/1,000 s.f./day] = ~~-4,544.8~~ 3,598.6 pounds per day). As such, the Project would have a reduced potential for solid waste disposal impacts as compared to what was disclosed by the OMCPU EIR. Although the proposed Project would reduce solid waste impacts as compared to what was disclosed for the CVSP area by the OMCPU EIR, the proposed Project is still a program-level document, and implementation of the Project can't guarantee that all future implementing developments would attain the 75 percent state-mandated diversion rate. Each implementing development project would be required to show compliance with OMCPU Mitigation Framework UTIL-1, which requires that future development projects that generate 60 tons or more of solid waste prepare a Waste Management Plan (WMP). Consistent with the OMPCU EIR findings, even with implementation of Mitigation Framework UTIL-1 and compliance with the Storage, Recycling, and C&D ordinances, impacts related to solid waste to meet the diversion requirement cannot be assured at the program-level. Therefore, and consistent with the findings of the OMCPU EIR, further evaluation would be required at the implementing development level to identify additional mitigation measures to reduce significant impacts. Accordingly, the proposed Project would result in a significant and unavoidable impact due to landfill capacity at the program-level, consistent with the findings of the OMCPU EIR. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Storm Water Drainage Facilities

No Substantial Change from Previous Analysis. Under existing conditions, there are minimal drainage improvements within the Project site boundary. Two of the finger canyons drain to sump areas that are collected and drained to the west and discharged downstream within the canyon via an existing RCP storm drain. A large portion of the Project area drains to the northwest to a canyon (North tributary of Spring Canyon) on the north side of the proposed Airway Road. The portion of the Project area located to the northeast of the Airway Road/Cactus Road intersection drains to the northwest and into a culvert underneath Cactus Road. After crossing Cactus Road, the runoff commingles with other runoff draining from upstream areas and then drains to the upstream point of North Canyon (PDC, 2016, p. 3).

Development on the Project site as called for under the OMCPU and the proposed CVSP would increase impervious surfaces, resulting in the potential for greater surface runoff and increased demands on existing storm water systems within the OMCPU area as compared to the existing condition. The OMCPU noted that no storm drains, or other community-wide drainage facilities are proposed for construction in conjunction with adoption of the OMCPU. Similarly, no drainage facilities are proposed to be constructed in conjunction with the proposed CVSP. Storm water facilities and drainage facilities would be proposed with site-specific development proposals. Consistent with the findings of the OMCPU EIR, each future development would be required to conduct a drainage study, and design and build a storm drain system as necessary to serve the development, and would be required to reduce or mitigate impacts prior to implementation. All future implementing projects would also be required to meet the standards outlined in the City of San Diego Drainage Design Manual and would be required to fully meet the City of San Diego Storm Water Standards in effect at the time of approval. Additionally, future development projects would be required to comply with OMCPU Policies and Specific Plan Policies (See CVSP Section 2.6.2) to ensure that impacts due to installation of storm water infrastructure would be reduced to below a level of significance. Accordingly, and consistent with the findings of the OMCPU EIR, impacts associated with storm water facilities would be less than significant at the program-level. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Communication Systems

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

WATER SUPPLY

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

OMCPU EIR

The OMCPU EIR found that based on the Water Supply Assessments (WSA) of the City's water suppliers providing service to the OMCPU area, including the PUD and OWD, there would be sufficient water supply to serve existing demands and projected demands of the OMCPU. As such, the OMPCU EIR concluded that impacts related to water supply would be less than significant. (City of San Diego, 2014b, pp. 5.14-9 through 5.14-27)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The majority of the Project site is located within the OWD service area and a small portion of the Project site (west of Heritage Road) is located in the City PUD service area. According to the City PUD Water Supply Assessment (WSA) and the OWD WSA prepared for the OMCPU EIR, estimated water supply would meet the projected water demands of the City PUD and OWD service areas during a normal, single dry year, and multiple dry years over a 20-year period. A WSA Update Letter was prepared for the proposed Project by C2HM in order to evaluate the proposed Project's water supply requirements. OWD staff concurred with the WSA Update Letter (email dated August 8, 2016).

The WSA Update Letter noted that the area within the City PUD service area would generate an average annual water demand of approximately 173 acre feet per year (afy) (CH2M, 2016, p. 2). Upon review of the City's approved OMCPU WSA (City of San Diego, 2011b), the proposed Project land use and water demand for the

approximate 15 acres is consistent with the WSA and has therefore been included as part of the water supply documentation for the City (CH2M, 2016, p. 3).

The only notable change in water supply from the OMCPU assumptions is that the OWD has implemented a moratorium on the use of recycled water in the Otay Mesa area due to the high capital cost to extend recycled water service to the area, in a District Board action dated July 2, 2014. As a result, OWD will not require the construction of any recycled water facilities as part of the proposed Project and all future irrigation will be via the potable water system. (CH2M, 2016, pp. 3-4)

The WSA Update Letter notes that the area within the OWD service area would generate an average annual water demand of approximately 1,465 afy. The proposed Project is expected to only slightly increase the potable water demand for the Project site by ~~20~~ 156 afy from the May 2013 WSA and Verification Report prepared for the OMCPU and approved by the District Board. This increase is expected because the ~~western portions of the Central Village are within the City's PUD service area, but likely would be served instead by OWD~~ OMCPU EIR proposed recycled water demands are now planned by the proposed Project to be served by the potable water system. Thus, the currently proposed Project would exceed the potable water demand due to the proposed recycled water demands now planned by the OWD to be served by the potable water system due to the moratorium on the use of recycled water in the Otay Mesa area, as discussed above. The previously estimated ~~1,445~~ 1,309 afy demand (May 2013 WSA&V Report) was accounted for in the OWD 2015 Urban Water Management Plan (UWMP) and the Water Authority's 2015 UWMP (OWD, 2013a; Water Authority, 2016; OWD, 2016a). Therefore, based on the findings from the OWD 2015 UWMP and the Water Authority's 2015 UWMP, the proposed Project would result in minor unanticipated demands that could be supplied by the Water Authority's Accelerated Forecasted Growth supply (OWD, 2016a; Water Authority, 2016).

Based the foregoing analysis, and on the information contained in the WSAs prepared for the OMCPU EIR and the Project's WSA Update Letter, there is adequate water to serve the proposed Project within the City's PUD and OWD water service areas based on the CVSP's proposed land uses and approved OMCPU WSAs. These findings serve as sufficient water supply documentation for the proposed Project. Furthermore, the OWD would review future implementing site-specific discretionary actions within the Project area to determine if any additional water supply documentation is required at that time, or if the OMCPU WSA remains adequate. If required, a revised, new, or updated WSA would be prepared by the OWD at the City's request, for approval by their Board as part of future implementing developments. (CH2M, 2016, p. 5)

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

POPULATION AND HOUSING

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

OMCPU EIR

The OMCPU EIR found that buildout of the OMPCU would result in substantial population growth. However, the OMCPU EIR found that population growth would implement policies contained in SANDAG's Regional Comprehensive Plan (RCP) (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and the City of San Diego's General Plan by providing a mix of housing types near public transportation, increase the regional and local supply of housing needed in accordance with SANDAG's regional growth forecast, and focus housing supply within compact villages that would be linked together by public transportation. As such, the OMCPU EIR found that impacts associated with population growth would be less than significant without mitigation. (City of San Diego, 2014b, pp. 5.16-5 through 5.16-8)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. As noted in the OMPCU EIR, the OMCPU would result in both direct and indirect substantial population growth; however, impacts due to direct and indirect substantial population growth were previously concluded to be less than significant in the OMCPU EIR due to the OMCPU containing policies that would implement the SANDAG's RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and City's General Plan and Housing Element by focusing population growth and housing supply within compact villages. The Project site is located within one of the OMCPU's planned villages. The proposed Project involves a Community Plan Amendment and Specific Plan that would allow for the future development of up to 4,485 residential dwelling units. The Project's 4,485 dwelling units would generate a future population increase of approximately 15,473 persons, utilizing a person per household ratio of 3.45 (City of San Diego, 2014a, p. LU-17; Table 2-5). It should be noted that the OMCPU EIR assumed a total of ~~5,246~~ 4,768 dwelling units for the Central Village, which would result in a future population of 19,095. Thus, the site's future population would be slightly reduced. However, the CVSP also would increase the amount of commercial area from 32,700 s.f. to 139,700 s.f., thereby better accommodating future population growth as compared to what was evaluated in the OMCPU EIR by providing more local jobs in close proximity to residential uses. (City of San Diego, 2014b, p. 5.16-6; Chen Ryan, 2017, Table 4.1)

Although the proposed Project would result in direct and indirect population growth, the Project would focus growth and provide housing in a compact village conducive to supporting transit in accordance with the RCP (updated and renamed to: San Diego Forward: The Regional Plan, approved October, 2015) and General Plan goals and policies. Accordingly, and consistent with the finding of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impact due to direct and indirect substantial population growth. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis: As noted in the OMCPU EIR, impacts associated with compliance with the City's Inclusionary Affordable Housing Ordinance were previously evaluated as less than significant due to the OMCPU providing multi-family units and implementing policies that would provide affordable housing within the OMPCU area. The proposed Project would allow for the future development of 4,485 multi-family residential units, with densities ranging from 10-44 du/ac. Furthermore, the proposed Project would permit the development of a variety of housing types at different density ranges to provide housing that is more affordable, consistent with OMCPU Policies 2.2-5 and 2.2-6. Furthermore, all future implementing developments within the CVSP would be required to comply with all applicable goals and policies OMCPU, including the OMCPU Policies that ensure compliance with the City's Inclusionary Affordable Housing Ordinance. Accordingly, and consistent with the finding of the OMCPU EIR, implementation of the proposed Project would result in a less-than-significant impact due to compliance with the City's Inclusionary Affordable Housing Ordinance. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

AGRICULTURAL AND MINERAL RESOURCES

Would the land use modifications associated with the CVSP result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Would the CVSP result in changes to the existing environment, which due to their location or nature, could result in the conversion of farmland to non-agricultural use?

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. According to mapping available from the California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP), the Central Village is identified as containing Farmland of Statewide Importance (80.3 acres), Farmland of Local Importance (69.3 acres) Unique Farmland (26.5 acres), Grazing (20.8 acres), Urban and Built-Up Land (1.0 acre), and Other Lands (15.4 acres). Buildout of the CVSP would convert on-site lands, including areas identified as Unique Farmland and Farmland of Statewide Importance (Farmland), to non-agricultural use. (CDC, 2015) However, as noted in the OMCPU EIR, Farmland within the OMCPU area is intended as an interim use. Conversion to urban development is expected upon buildout of the area in accordance with the OMCPU. Additionally, the Project proposes to change the zoning designation of the 229.2-acre Central Village to accommodate the land uses proposed as part of the CVSP (see Figure 5), as anticipated by the OMCPU. Consistent with the findings of the OMCPU EIR, rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts are anticipated to reduce the viability of agricultural activities on site over time. The Project's impacts to Farmland are consistent with the impacts disclosed in the OMCPU EIR. Consistent with the findings of the OMCPU EIR, the Project's anticipated conversion of Farmland to non-agricultural uses represent less-than-significant impacts of the proposed Project. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

Would implementation of the CVSP result in the loss of availability or prevention of future extraction of sand or gravel, and/or mineral resources as identified in the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey?

OMCPU EIR

The OMCPU EIR found that portions of the OMCPU area are located within Mineral Resource Zone (MRZ)-2 and MRZ-3. MRZ-3 zones are not considered sensitive because they comprise areas that may or may not have mineral resources. However, MRZ-2 lands represent areas containing regionally significant mineral deposits. The OMCPU EIR found that the majority of acreage designated MRZ-2, which occurs in the northernmost portion of the OMCPU area, contains existing residential uses that would be incompatible with the establishment of any new mineral resources operations. In addition, the OMCPU EIR found that the OMCPU area does not include any existing or

proposed mining operations, and development associated with buildout of the OMCPU would not result in indirect impacts to any existing extraction operations in the vicinity of the OMCPU. As such, the OMCPU EIR concluded that the ability to extract mineral resources would not be impacted with implementation of the OMCPU. The General Plan and OMCPU also do not identify any portion of the OMCPU as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would occur. (City of San Diego, 2014b, pp. 5.17-13 through 5.17-15)

CENTRAL VILLAGE PROJECT

No Substantial Change from Previous Analysis. The General Plan, OMCPU, and proposed CVSP do not identify any portion of the Central Village as a locally important mineral resources recovery site, and no impact due to the loss of such locally-important sites would not occur as a result of Project implementation. According to OMCPU EIR Figure 5.17-3, the Project site is located within the MRZ-3 mineral resources zone, which "are areas containing mineral deposits, the significance of which cannot be evaluated from available data" (City of San Diego, 2014b, p. 5.17-10 and Figure 5.17-3). Accordingly, and consistent with the finding of the OMCPU EIR, future development on-site that would be a reasonably foreseeable consequence of the Project would result in a less-than-significant impact associated with the loss of availability of a known mineral resource as identified in the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR.

GREENHOUSE GAS EMISSIONS

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

Construction Emissions

Because the development area (229.2 acres) assumed by the OMCPU EIR and the development area (229.2 acres) proposed by the CVSP are the same, it is assumed that construction activities associated with buildout of the Central Village would largely remain the same as assumed by the OMCPU EIR in the Central Village area. The OMCPU EIR's consideration of construction-related GHG emissions assumed that sources of construction-related emissions would include: a) fugitive dust from grading activities; b) construction equipment exhaust; c) construction-related trips by workers, delivery trucks, and material-hauling trucks; and d) construction-related power consumption. Based on industry-standard construction practices, these are reasonable assumptions for sources of construction activity air emissions in the proposed Project. As such, there would be no change in construction-related GHG emissions quantities associated with the CVSP. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017b, p. 40)

Operational Emissions

GHG emissions generated from Area, Energy, Mobile, Solid Waste, and Water uses is calculated within CalEEMod. The program is largely based on default settings though were modified to match the inputs used for the GHG study under the OMCPU EIR's analysis. Statewide averages for utility emissions were utilized for the calculations throughout the model. The calculated operational emissions are identified in Section 4.0 of the Project's Greenhouse Gas Assessment (*Technical Appendix D)*. The CalEEMod 2013.2.2 air quality model was used to quantify GHG emissions from operation of land uses in the Central Village. CalEEMod defaults were adjusted where necessary to account for compatibility of input data from the OMCPU EIR for the Central Village, and traffic trip generation data from the CVSP's Transportation Facilities Trigger Analysis (Chen Ryan & Associates, 2017). At full buildout of the Central Village, the OMCPU EIR assumed the generation of ~~45,429~~ 41,109 external daily trips. In comparison, 36,345 external daily trips would be generated by land uses in the Central Village under the proposed Project. The CalEEMod 2013.2.2 air quality model was run on both scenarios to remain consistent. (The OMCPU EIR used CalEEMod 2011). As a result of the land use changes proposed by the CVSP (namely, more commercial square footage and a repositioning of commercial space to the Airway Road corridor, fewer residential units, and less park space), the CVSP Project would generate fewer vehicle trips and less vehicle miles traveled (VMT) than it would have under the planning assumptions utilized by the OMCPU EIR. The reduction in VMTs under the proposed CVSP project is largely due to the fact that the CVSP orients higher density residential and commercial land uses along Airway Road which will have better public transit access, better access from areas outside of the CVSP to allow pass-by usage, an increased job to housing ratio and better internal connectivity to parks, the school site, and open space/trails. Given this, VMTs under the CVSP project would be reduced by approximately ~~7,897,311~~ 22,182,198 as compared to the assumptions for the CVSP in the OMCPU EIR. (Ldn, 2017b, pp. 40-41)

The expected daily pollutant generation can be calculated utilizing the product of the average daily miles traveled and the expected emissions inventory calculated by CALEEMOD utilizing emissions from EMFAC2011. Table 5.1 compares the GHG emissions disclosed by the OMCPU EIR for the Central Village and emissions calculated to occur upon buildout of the proposed CVSP Project, and shows the differences between the land use development plans. Based on these findings, operational GHG emissions will be reduced roughly ~~5,144.44~~ 8,749.83 metric tons (MT) per year under the proposed CVSP Project as compared to what was evaluated and disclosed by the OMCPU EIR for the Central Village. Depending on the category of emissions, a ~~6.8~~ 5% to ~~14~~ 16% reduction can be expected from implementation of the proposed CVSP Project. Given this, no new or more severe GHG impacts would result from implementation of the proposed CVSP Project beyond the emissions that were already evaluated and disclosed by the OMCPU EIR for the Central Village. (Ldn, 2017b, p. 41)

It should be noted that the proposed Project is a program level analysis, and specific project-level development plans and their associated design features are not available to analyze within this GHG analysis; rather, the purpose of this GHG analysis is to determine whether buildout of the proposed CVSP Project would result in new or more severe environmental impacts related to GHG emissions as compared to what was evaluated and disclosed for the Central Village by the OMCPU EIR. The OMCPU EIR concluded that GHG emissions would be generated from development in the OMCPU area, either directly or indirectly, that may have a significant impact on the environment. Although impacts associated with the contribution of GHG emissions to cumulative statewide emissions were found to be significant and unavoidable for the Central Village by the OMCPU EIR, the City's updated significance threshold enacted pursuant to the CAP (as described in Subsection 5.1 of the Project's GHG Assessment, and in the threshold below) would apply to the currently proposed CVSP. The significance threshold for GHG emissions based on CAP compliance provides an updated, localized, and comprehensive approach for the assessment of the significance of GHG emissions. As demonstrated in the analysis throughout the Project's Greenhouse Gas Assessment as well as in the Greenhouse Gas Emissions Section of this Addendum, the CVSP Project is compliant with the CAP and does not conflict with the CAP. The CAP provides a localized evaluation of GHG emissions, and reduction targets and strategies to reduce impacts to cumulative state emissions. Therefore, impacts associated with CVSP's contribution of GHG emissions to cumulative statewide emissions would be less than significant, because the proposed CVSP is consistent with the CAP which reduces the cumulative contribution to statewide GHG emissions to less-than-significant levels. Thus, the CVSP would result in a reduced impact as compared to the OMCPU EIR, pursuant to the use of the updated and localized CAP threshold in addition to reducing the quantity of GHG emissions as calculated in the Project's Greenhouse Gas Assessment. The proposed CVSP would be consistent with the findings and conclusion of the OMCPU EIR because the proposed CVSP

reduces a significant and unavoidable impact under the OMCPU EIR to less than significant levels. No new impact would occur in comparison to the GHG analysis presented in the OMCPU EIR, and the proposed Project would reduce the OMCPU EIR's significant and unavoidable impact to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017b, pp. 42-43)

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

OMCPU EIR

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

CENTRAL VILLAGE PROJECT

In the time following the certification of the OMCPU EIR (2014), the City of San Diego adopted a CAP (December 2015) and an amendment to the CAP to add a Consistency Checklist. For purposes of analysis herein, the significance threshold related to "conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs" is based on the City's approved CAP, which is the methodology now used by the City in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts. Thus, the threshold utilized in the OMCPU EIR has been replaced with a threshold that specifically references the City's CAP as the applicable plan for reducing GHG emissions in the City of San Diego. Determining significance under this threshold for the proposed CVSP, a planning document, entailed the preparation of ~~"Step 3" of~~ a Climate Action Plan ~~Consistency Checklist~~ Conformance Evaluation for Community Plan Updates. ~~Step 3 of the CAP Consistency Checklist for the proposed Project~~ This is included under Subsection 5.2 of the Project's Greenhouse Gas Assessment prepared by Ldn Consulting, Inc. (Ldn). ~~(City of San Diego, 2016a, Step 3; Ldn, 2017b, p. 24)~~ (Ldn, 2017b, p. 24; City of San Diego, 2017b)

The City of San Diego adopted a ~~Climate Action Plan (~~CAP~~)~~ in December 2015 that outlines the actions that the City will undertake to achieve its proportional share of State GHG emission reductions. In accordance with the recommendations from the State of California and the California Air Resources Board, the City's CAP includes a target to achieve a 15 percent reduction from 2010 GHG baseline levels by the year 2020. The CAP also includes the City's 2050 GHG emissions reduction target at 80 percent below the 2010 baseline. The CAP identifies five strategies to reduce GHG emissions to achieve the 2020 and 2050 reduction targets. The five strategies include: energy and water efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste (gas and waste management); and climate resiliency. In order to ensure that future developments comply with the CAP, the City adopted a CAP Consistency Checklist. The Checklist is part of the CAP and contains measures that are to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development projects are consistent with the CAP's assumptions and relevant CAP strategies to assist the City in achieving its identified GHG reduction targets. Projects that are consistent to conclude that the Project would have less than significant cumulatively considerable GHG emissions impacts under CEQA. (Ldn, 2017b, p. 25)

Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, compliance with the CAP constitutes a project's consistency with applicable plans, policies, and regulations for the purposes of reducing GHG emissions. ~~As noted above, the method for determining significance under this threshold entails the preparation of "Step 3" of the CAP~~

~~Consistency Checklist.~~ Provided in the Project's Greenhouse Gas Assessment is an analysis of the CVSP Project's compliance with the CAP using ~~the CAP's conformance questions from Step 3 of the CAP Consistency Checklist as they relate to implementation actions~~ questions from the Climate Action Plan Conformance Evaluation for Community Plan Updates. These questions serve as a tool to help guide the CAP-related compliance discussion as it relates to the proposed CVSP. (Ldn, 2017b, p. 25)

The Project's CAP Consistency Checklist analysis determined that the Project is compliant with the City's CAP. Through the implementation of the CVSP's Design Standards and Policies, the CVSP will help to implement the City's strategies to reduce GHG emissions to achieve the 2020 and 2050 reduction targets. Please refer to Subsection 5.2 of the Project's Greenhouse Gas Assessment (*Technical Appendix D*) for the ~~Project's full CAP Consistency Checklist~~ completed Climate Action Plan Conformance Evaluation for Community Plan Updates. Because the City's CAP was prepared in compliance with CEQA Section 15183.5 and is intended to achieve the City of San Diego's share of Statewide GHG reduction targets, the CVSP's demonstrated compliance with the CAP indicates that a less than significant GHG impact would occur related to compliance with planning policies and regulations. No new impact would occur in comparison to the GHG analysis presented in the OMCPU EIR, and the proposed Project would reduce the OMCPU EIR's significant and unavoidable impact to less-than-significant levels. Therefore, implementation of the proposed Project would not result in any new impacts or increase the severity of a previously identified significant impact as previously analyzed in the OMCPU EIR. (Ldn, 2017b, pp. 39-40)

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

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

Mitigation Measure AQ-1: For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

a. Minimizing simultaneous operation of multiple pieces of construction equipment;

b. Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment;

c. Use of alternative fueled construction equipment;

d. Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; and

e. Minimizing idling time by construction vehicles.

Mitigation Measure AQ-2: Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

Mitigation Measure AQ-3: Prior to the issuance of building permits for any new facility that would have the potential to emit toxic air contaminants, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. If adverse health impacts exceeding public notification levels (cancer risk equal to or greater than 10 in 1,000,000; see Section 5.3.5.1 [b & c]) are identified, the facility shall provide public notice to residents located within the public notification area and submit a risk reduction audit and plan to the APCD that demonstrates how the facility would reduce health risks to less than significant levels within five years of the date of the plan.

Mitigation Measure AQ-4: Prior to the issuance of building permits for any project containing a facility identified in Table 9, *California Air Resources Board Land Use Siting Constraints*, or locating air quality sensitive receptors closer than the recommended buffer distances, future projects implemented in accordance with the CPU shall be required to prepare a health risk assessment (HRA) with a Tier I analysis in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (APCD, 2015; OEHHA, 2015). All HRAs shall include:

1. the estimated maximum 70-year lifetime cancer risk,

2. the estimated maximum non-cancer chronic health hazard index (HHI), and

3. the estimated maximum non-cancer acute health hazard index (HHI).

Risk estimates shall each be made for the off-site point of maximum health impact (PMI), the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The location of each of these receptors shall be specified. The lifetime cancer risk, non-cancer chronic and acute health hazard indexes for nearby sensitive receptors shall also be reported. Cancer and non-cancer chronic risk estimates shall be based on inhalation risks. HRAs shall include estimates of population exposure, including cancer burden, as well as cancer and non-cancer chronic and acute risk isopleths (contours). The HRA shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.

Mitigation Measure BIO-1: To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the Community Plan Update (CPU; [CVSP]) area, all subsequent projects implemented in accordance with the CPU (CVSP) shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City Biology Guidelines (City of San Diego, 2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within CPU (CVSP) area, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act, California Endangered Species Act, MSCP Subarea Plan, and Environmentally Sensitive Lands (ESL) Regulations.

In addition to the requirements detailed above, specific measures shall be implemented when the biological survey results in the identification of BUOW on the project site. Future projects shall be required to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should BUOW habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed in accordance with the protocol established in the Staff Report on Burrowing Owl Mitigation (CDFW, 2012). Measures to avoid and minimize impacts to BUOW shall be included in a Conceptual Burrowing Owl Mitigation Plan which includes take avoidance (preconstruction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts.

Mitigation for Impacts to Sensitive Upland Habitats

Future projects implemented in accordance with the CPU (CVSP) resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the Biology Guidelines and MSCP Subarea Plan (City of San Diego, 1997, Table 5.47; City of San Diego, 2012). Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, oak woodlands, coastal sage scrub, and consistent with Federal, State, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the Biology Guidelines

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego, 2012). These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). If final engineering requirements for Airway Road impact existing conserved lands, an additional 1:1 ratio shall be added to the City required mitigation ratio in order to replace the lands that were previously preserved as open space.

Mitigation lands purchased to compensate for impacts to areas within conserved lands shall be located in the Otay Mesa area if feasible.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction.
Specific measures necessary for reducing potential construction-related noise impacts to the CAGN, least Bell's vireo, BUOW, and the cactus wren are further detailed in BIO-2 and LU-2.

Mitigation Measure BIO-2: Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the CPU (CVSP) area, shall be identified in site-specific biological resources surveys prepared in accordance with the Biology Guidelines as further detailed in BIO-1 during the discretionary review process. The biological resources report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting or foraging activities shall be addressed in the biological resources report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species specific mitigation plans (such as a Burrowing Owl Mitigation Plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Fish and Game Code, and/or the ESL Regulations.

Mitigation Measure GEO-1: Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code. More specifically, compressible soils impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Future development shall also be required to clean up deleterious material and properly moisture, condition, and compact the soil in order to provide suitable foundation support. Regarding impacts related to expansive soils, future development shall be required to implement typical remediation measures, which shall include placing a minimum 5-foot cap of low expansive (Expansion Index [EI] of 50 or less) over the clays; or design of foundations and surface improvements to account for expansive soil movement.

Mitigation Measure GEO-2: As part of the future development permitting process, the City shall require individual projects to adhere to the Grading Regulation and NPDES permit requirements. All subsequent projects developed in accordance with the CPU shall also adhere to the California Building Code to avoid or reduce geologic hazards to the satisfaction of the City Engineer.

Submittal, review, and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level grading and site plans shall be incorporated into all future projects implemented in accordance with the CPU to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the following measures to control erosion during and after grading or construction:

- Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;

- Short-term measures, such as sandbag placement and temporary detention basins;

- Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and

- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to mandated City grading requirements shall ensure that future grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved SWPPP that shall consider the full range of erosion control BMPs such as, but not limited to, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

Prior to obtaining grading permits for future actions a site-specific geotechnical investigation shall be completed as necessary in accordance with the City of San Diego Guidelines for Preparing Geotechnical Reports. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer. Measures designed to reduce erosion at the project-level shall include the following:

- Control erosion by minimizing the area of slope disturbance and coordinate the timing of grading, resurfacing, and landscaping where disturbance does occur.
- On sites for industrial activities require reclamation plans that control erosion, where feasible, in accordance with the LDC.
- Control erosion caused by storm runoff and other water sources.
- Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, insure public safety, provide aesthetic enjoyment, and protect biological resources.
- Replant with native, drought-resistant plants to restore natural appearance and prevent erosion.
- Practice erosion control techniques when grading or preparing building sites.
- Utilize ground cover vegetation when landscaping a development in a drainage area to help control runoff.
- Incorporate sedimentation ponds as part of any flood control or runoff control facility.
- During construction, take measures to control runoff from construction sites. Filter fabric fences, heavy plastic earth covers, gravel berms, or lines of straw bales are a few of the techniques to consider.
- Phase grading so that prompt revegetation or construction can control erosion. Only disturb those areas that will later be resurfaced, landscaped, or built on. Resurface parking lots and roadways as soon as possible, without waiting until completion of construction.
- Promptly revegetate graded slopes with groundcover or a combination of groundcover, shrubs, and trees. Hydroseeding may substitute for container plantings. Groundcovers shall have moderate to high erosion control qualities.
- Where necessary, design drainage facilities to ensure adequate protection for the community while minimizing erosion and other adverse effects of storm runoff to the natural topography and open space areas.

- Ensure that the timing and method of slope preparation protects natural areas from disturbance due to erosion or trampling. The final surface shall be compacted and spillovers into natural areas shall be avoided.

- Plant and maintain natural groundcover on all created slopes.

When required, the geologic technical report shall consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes field work and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official. In addition, the Building Official shall require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site. Section 145.1802 of the San Diego Municipal Code discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS (City of San Diego, 2016).

Mitigation Measure GHG-1[2]: Future projects implemented in accordance with the [CVSP] CPU shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Mobility, Urban Design, and Conservation elements of the [CVSP] CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate sensitive community design. Future projects implemented in accordance with the [CVSP] CPU shall be required to prepare a project-level CAP Consistency Checklist to demonstrate consistency.

Mitigation Measure HAZ-1: Future projects implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to GP and CPU policies intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.07 of the LDC, and Chapter 7 of the California Building Code.

Mitigation Measure HAZ-2: To prevent the development of structures that may pose a hazard to air navigation, the City shall inform project applicants for future development concerning the existence of the Part 77 imaginary surfaces and Terminal Instrument Procedures and FAA requirements. The City shall also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City shall not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. Also, the City shall not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

Mitigation Measure HAZ-3:

a. A Phase I Site Assessment shall be completed in accordance with federal, state, and local regulations for any property identified on a list compiled pursuant to Government Code Section 65962.5. The report shall include an existing condition survey, detailed project description, and specific measures proposed to preclude upset conditions (accidents) from occurring. If hazardous materials are identified, a Phase II risk assessment and remediation effort shall be conducted in conformance with federal, state, and local regulations.

[2] This mitigation measure has been updated from the OMCPU EIR in order to comply with updated significance threshold identified by the City of San Diego's CAP. Mitigation Measure GHG-1, tiered from PEIR No. 416603/SCH No. 2015021053 prepared for the CAP and the Addendum to the CAP EIR No. 416603 prepared for the CAP Consistency Checklist and other CAP Implementing Actions is applicable to the CVSP:

b. The applicant shall retain a qualified environmental engineer to develop a soil and groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The groundwater management and monitoring plans shall be approved by the City prior to development of the site.

c. The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by the local regulatory agencies (RWQCB/DTSC/DEH) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.

d. The applicant shall obtain written authorization from the regulatory agency (RWQCB/DTSC/DEH) confirming the completion of remediation. A copy of the authorization shall be submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEH shall be notified of the proposed land use.

e. All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with applicable regulatory agencies such as but not limited to San Diego Municipal Code Section 42.0801, Division 9 and Section 54.0701.

Mitigation Measure HIST-1: Prior to issuance of any permit for a future development project implemented in accordance with the CPU area that could directly affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities. Determination of the significance of potential impacts shall occur as set forth in OMCPU EIR Subsection 5.5.3.3.a.

INITIAL DETERMINATION
The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

STEP 1:
Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archeological testing, and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeology Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous

archeological research in similar areas, models that predict site distribution, and archeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist.

STEP 2:
Once a historical resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

STEP 3:
Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. These provisions are outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment

of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

STEP 4:
Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required (City of San Diego, 2001). Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports (City of San Diego, 2001). Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries (City of San Diego, 2001).

STEP 5:
For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection) (SHRC, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the Guidelines.

Mitigation Measure HIST-2: Prior to issuance of any permit for a future development project implemented in accordance with the CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

a. Preparing a historic resource management plan;

b. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);

c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;

d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource;

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

f. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the HRG, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

Mitigation Measure HYD/WQ-1: Prior to approval of development projects implemented under the CPU, the applicant shall demonstrate to the satisfaction of the City Engineer, based on the project application, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate feasible mitigation measures outlined below in accordance with the RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed hydraulic analysis.

a. San Diego RWQCB

- Comply with all NPDES permit(s) requirements, including the development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.

- If a future project includes in-water work, it shall require acquiring and adhering to a 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW).

- Comply with the San Diego RWQCB water quality objectives and bacteria TMDL.

b. City of San Diego

To prevent flooding, future projects shall be designed to incorporate any applicable measures from the City of San Diego LDC. Flood control measures that shall be incorporated into future projects within a SFHA, or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following

requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC.

- In all floodways, any encroachment, including fill, new construction, significant modifications, and other development, is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c)

- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the Special Flood Hazard Area, the developer shall obtain a Conditional Letter of Map Revision from FEMA.

- Fill placed in the Special Flood Hazard Area for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials (ASTM) Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.

- The applicant shall denote on the improvement plans “Subject to Inundation” all areas lower than the base elevation plus two feet.

- If the structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, the applicant must obtain a Letter of Map Revision based on Fill (LOMR-F) prior to occupancy of the building. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.

- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:

    - Stream scour is minimized.
    - Erosion protection is provided.
    - Water flow velocities are maintained as specified by the City Engineer.
    - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.
    - Wildlife habitat and corridors are maintained.
    - Groundwater recharge capability is maintained or improved.

- Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:

    - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
    - The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.
    - Grading and filling are limited to the minim amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained.

- The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.
- There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.

Mitigation Measure HYD/WQ-2: Future projects shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall ensure that any impacts on receiving waters shall be precluded and, if necessary, mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual.

Storm water improvements and water quality protection measures that shall be required of future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent feasible, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego Regional Water Quality Control Board and Municipal Code Compliance

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Stormwater Regulations.
- In accordance with the City of San Diego Stormwater Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

Mitigation Measure LU-2: All subsequent development projects that are implemented in accordance with the CPU (CVSP) which is adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA, and berms or walls adjacent to commercial or industrial areas and any other use that may introduce construction noise or noise from future development that could impact or interfere with

wildlife utilization of the MHPA. The project biologist for each proposed project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP. Prior to approval of any subsequent development project in an area adjacent to a designated MHPA, the City shall identify specific conditions of approval in order to avoid or to reduce potential impacts to adjacent the MHPA.

Specific requirements shall include:

- Prior to the issuance of occupancy permits, development areas shall be permanently fenced where development is adjacent to the MHPA to deter the intrusion of people and/or pets into the MHPA open space areas. Signage may be installed as an additional deterrent to human intrusion as required by the City.

- The use of structural and nonstructural best management practices (BMPs), including sediment catchment devices, shall be required to reduce the potential indirect impacts associated with construction to drainage and water quality. Drainage shall be directed away from the MHPA or, if not possible, must not drain directly into the MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and reviewed satisfactory to the City Engineer.

- All outdoor lighting adjacent to open space areas shall be shielded to prevent light overspill off-site. Shielding shall consist of the installation of fixtures that physically direct light away from the outer edges of the road or landscaping, berms, or other barriers at the edge of development that prevent light over-spill.

- The landscape plan for the project shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA.

- All manufactured slopes must be included within the development footprint and outside the MHPA.

- All brush management areas shall be shown on the site plan and reviewed and approved by the Environmental Designee. Zone 1 brush management areas shall be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new Development, regardless of the ownership, the brush management in the Zone 2 area shall be the responsibility of a homeowners association or other private party.

- Access to the MHPA, if any, shall be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the Environmental Designee.

- Land uses, such as recreation and agriculture, that use chemicals or generate byproducts such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement shall be incorporated into leases on publicly owned property as leases come up for renewal.

Mitigation Measure NOI-1: Prior to the issuance of building permits, site-specific exterior noise analyses that demonstrate that the project would not place residential receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility standards of the City's General Plan shall be required as part of the review of future residential development proposals. Noise reduction measures, including but not limited to building noise barriers, increased building setbacks, speed reductions on surrounding roadways, alternative pavement surfaces, or other relevant noise attenuation measures, may be used to achieve the noise compatibility

standards. Exact noise mitigation measures and their effectiveness shall be determined by the site-specific exterior noise analyses.

Mitigation Measure NOI-2: When building plans are available and prior to the issuance of building permits, site specific interior noise analyses demonstrating compliance with the interior noise compatibility standards of the City's General Plan and other applicable regulations shall be prepared for noise sensitive land uses located in areas where the exterior noise levels exceed the noise compatibility standards of the City's General Plan. Noise control measures, including but not limited to increasing roof, wall, window, and door sound attenuation ratings, placing HVAC in noise reducing enclosures, or designing buildings so that no windows face freeways or major roadways may be used to achieve the noise compatibility standards. Exact noise mitigation measures and their effectiveness shall be determined by the site specific exterior noise analyses.

Mitigation Measure NOI-3: Prior to the issuance of a building permit, a site-specific acoustical/noise analysis of any on-site generated noise sources, including generators, mechanical equipment, and trucks, shall be prepared which identifies all noise-generating equipment, predicts noise levels at property lines from all identified equipment, and recommends mitigation to be implemented (e.g., enclosures, barriers, site orientation), to ensure compliance with the City's Noise Abatement and Control Ordinance. Noise reduction measures shall include building noise-attenuating walls, reducing noise at the source by requiring quieter machinery or limiting the hours of operation, or other attenuation measures. Additionally, future projects shall be required to buffer sensitive receptors from noise sources through the use of open space and other separation techniques as recommended after thorough analysis by a qualified acoustical engineer. Exact noise mitigation measures and their effectiveness shall be determined by the site specific noise analyses.

Mitigation Measure NOI-4: For projects that exceed daily construction noise thresholds established by the City of San Diego, best construction management practices shall be used to reduce construction noise levels to comply with standards established by the Municipal Code in Chapter 5, Article 9.5, Noise Abatement and Control. Project applicant shall prepare and implement a Construction Noise Management Plan. Appropriate management practices shall be determined on a project-by-project basis, and are specific to the location. Control measures shall include:

a. Minimizing simultaneous operation of multiple construction equipment units;

b. Locating stationary equipment as far as reasonable from sensitive receptors;

c. Requiring all internal combustion-engine-driven equipment to be equipped with mufflers that are in good operating condition and appropriate for the equipment; and

d. Construction of temporary noise barriers around construction sites that block the line-of-sight to surrounding receptors.

Mitigation Measure PALEO-1: Prior to the approval of development projects implemented in accordance with the CPU, the City shall determine, based on review of the project application submitted under CPIOZ TYPE B and recommendations of a project-level analysis of potential impacts on paleontological resources completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project-level and shall provide mitigation for the loss of important fossil remains with future discretionary projects that are subject to environmental review.

I. Prior to Project Approval

A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.

- Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.

- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

- Monitoring is always required when grading on a fossil recovery site or a known fossil location.

- Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).

- Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/ rock units are present at the surface.

- Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological MMRP shall be implemented during construction grading activities.

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

Mitigation Measure UTIL-1: Pursuant to the City's Significance Determination Thresholds, discretionary projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the ESD, and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).

b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).

c. Type of waste to be generated (demolition, construction, and occupancy).

d. Describe how the project will reduce the generation of C&D debris.

e. Describe how the C&D materials will be reused on-site.

f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.

g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.

h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.

i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.

j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.

k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.

l. Describe any International Standards of Operation 1, or other certification, if any.

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

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AB	Assembly Bill
ADT	Average Daily Trips
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AQIA	Air Quality Impact Assessment
AQMP	Air Quality Management Plan
AR-1-1	Agricultural – Residential (Zoning Designation)
ASTM	American Society of Testing and Materials
BACT	Best Available Control Technology
BAU	Business as Usual
BMP	Best Management Practice
BRRA	Biological Resources Report Addendum
BUOW	Burrowing Owl
C2HM	Cornell, Howland, Hayes & Merryfield (Technical Consultant)
CAPCOA	California Air Pollution Control Officers Association
CAGN	Coastal California Gnatcatcher
CC-3-6	Community Commercial (Zoning Designation)
CDC	California Department of Conservation
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
Ch.	Chapter
CIP	Capital Improvements Projects
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
Cont'd	Continued
CPA	Community Plan Amendment
CPIOZ	Community Plan Implementation Overlay Zone
CPU	Community Plan Update
CVSP	Central Village Specific Plan
CWA	Clean Water Act
DEH	County of San Diego Department of Environmental Health
DHS	California Department of Health Services
DPM	Diesel Particulate Matter
DPR	Department of Parks and Recreation
E+C	Existing plus Cumulative Projects
E+CP	Existing plus Cumulative Projects plus Project
E+P	Existing plus Project
EI	Expansion Index
EIR	Environmental Impact Report
EMFAC	EMission FACtor model
EPA	Environmental Protection Agency
ESL	Environmentally Sensitive Lands

Acronym	**Definition**
FAA	Federal Aviation Administration
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse Gas
HHI	Health Hazard Index
HRA	Health Risk Assessment
HRSL	Health Risk Screening Letter
I-5	Interstate 5
I-805	Interstate 805
LD	Low Density
LDC	Land Development Code
LID	Low Impact Design
LOMR-F	Letter of Map Revision based on Fill
LOS	Level of Service
MD	Medium Density
MEIR	Maximally Exposed Individual Resident
MEIW	Maximally Exposed Individual Worker
MERV	Maximum Efficiency Reporting Value
MH	Moderate to High Density
MHMP	Multi-Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MMRP	Mitigation Monitoring and Reporting Program
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MT	Million Tons
NAHC	Native American Heritage Commission
NO_x	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
O_3	Ozone
OC-1-1	Open Space – Conservation (Zoning Designation)
OEHHA	Office of Environmental Health Hazard Assessment
OMCP	Otay Mesa Community Plan
OMCPU	Otay Mesa Community Plan Update
~~OMDD~~	~~Otay Mesa Development District~~
OP-1-1	Open Space – Park (Zoning Designation)
OR-1-2	Open Space – Residential (Zoning Designation)
OWD	Otay Water District
PFFP	Public Facilities Financing Plan
PMI	Point of Maximum Impact
PUD	Public Utilities Department
QCB	Quino Checkerspot Butterfly
RAQS	Regional Air Quality Strategy

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RM-3-7	Residential – Multiple Unit
RWQCB	Regional Water Quality Control Board
SAMP	Sub Area Water Master Plan
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDMC	San Diego Municipal Code
SDRQCB	San Diego Regional Quality Control Board
SIP	State Implementation Plan
SP	Specific Plan
SPA	Specific Plan Area
SR-905	State Route 905
STC	Sound Transition Class
STM	City of Chula Vista Capital Improvement Program Identification Number
SWPPP	Storm Water Pollution Prevention Plan
SYSD	San Ysidro School District
TAC	Toxic Air Contaminant
TDIF	Transportation Development Impact Fee
TDM	Transportation Demand Management
TFTA	Transportation Facilities Trigger Analysis
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WMP	Waste Management Plan
WRMP	Water Resources Master Plan
WSA	Water Supply Assessment

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VIII. SIGNIFICANT UNMITIGATED IMPACTS

There are no new significant impacts identified for the current project. The proposed CVSP project does not change the original determination associated with the Final EIR for the OMCPU.

A majority of the significant impacts identified in the OMCPU Final EIR would be mitigated to below a level of significance through mitigation measures outlined in Table S-1 of the OMCPU EIR (and/or as modified herein). Consistent with the findings of the OMCPU EIR, impacts associated with air quality, biological resources, noise, transportation/traffic, and utilities/service systems (solid waste) would remain significant and unmitigated.

Because there were significant unmitigated impacts associated with the original OMCPU project approval, the decision-makers were required to make specific and substantiated CEQA Findings which stated that: a) specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR, and b) these impacts have been found acceptable because of specific overriding considerations. No new CEQA Findings are required with this project.

Anna L. McPherson

March 14, 2017

Anna L. McPherson AICP
Senior Planner
Development Services Department

Date of Final Report

Analyst: **McPherson**

Copies of the Addendum, the Final OMCPU EIR, the Mitigation Monitoring and Reporting Program, and supporting technical appendices may be reviewed in the office of the Development Services Department, located at 1222 First Avenue., San Diego, CA 92101-4101, or purchased from the Development Services Department for the cost of reproduction.

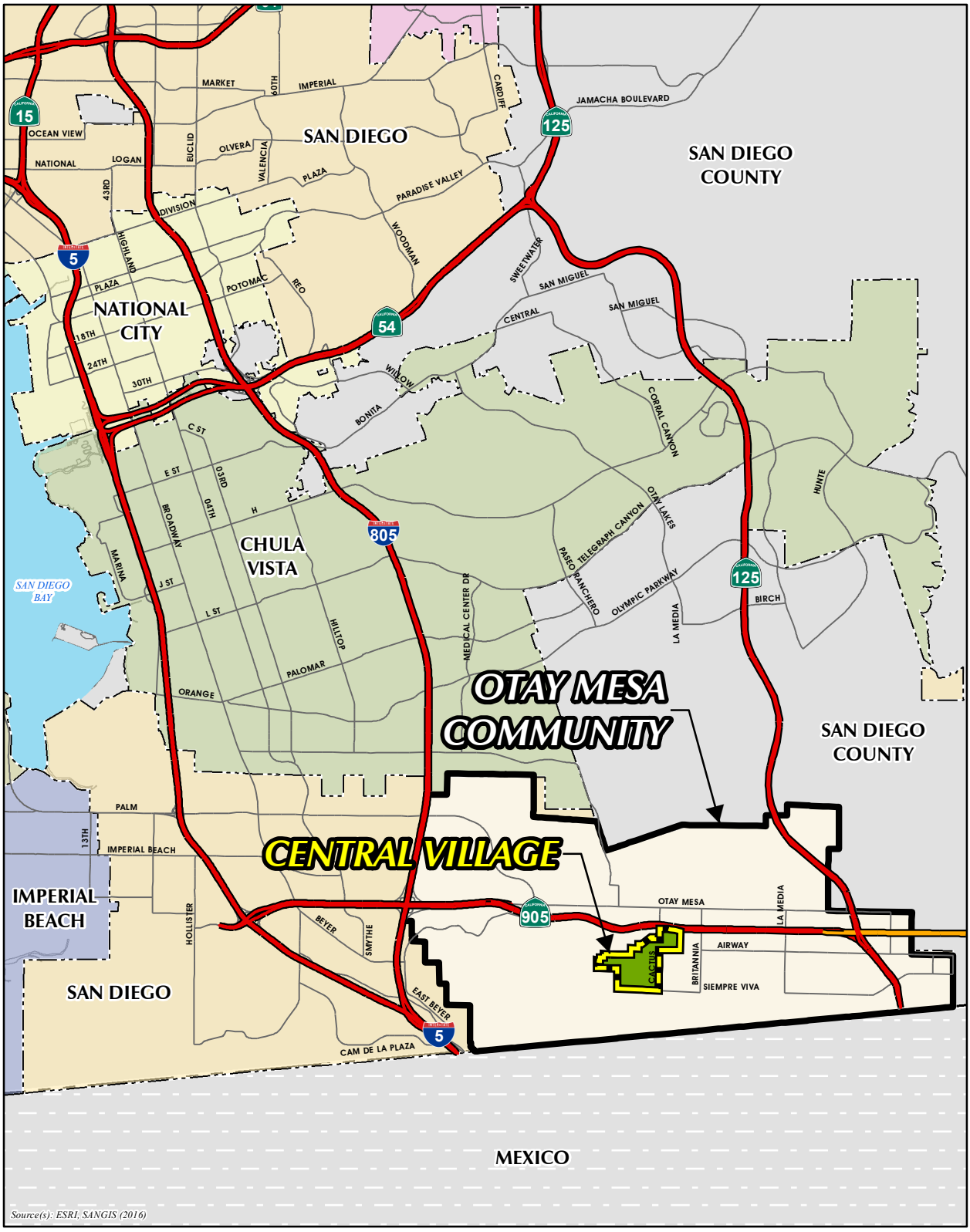
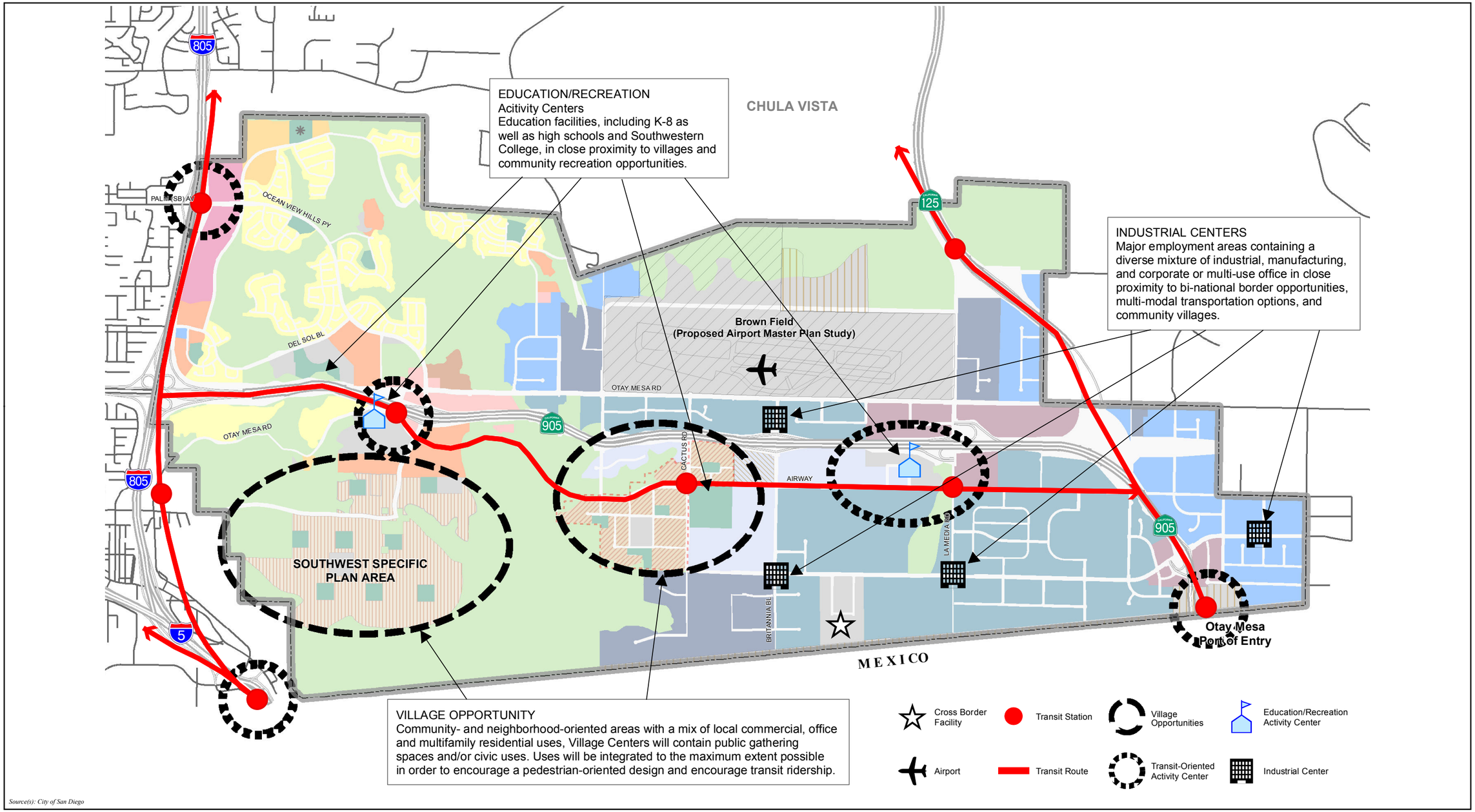


Figure 1

REGIONAL MAP



Source(s): City of San Diego

Figure 2

NOT TO SCALE

OTAY MESA COMMUNITY PLAN UPDATE VISION MAP

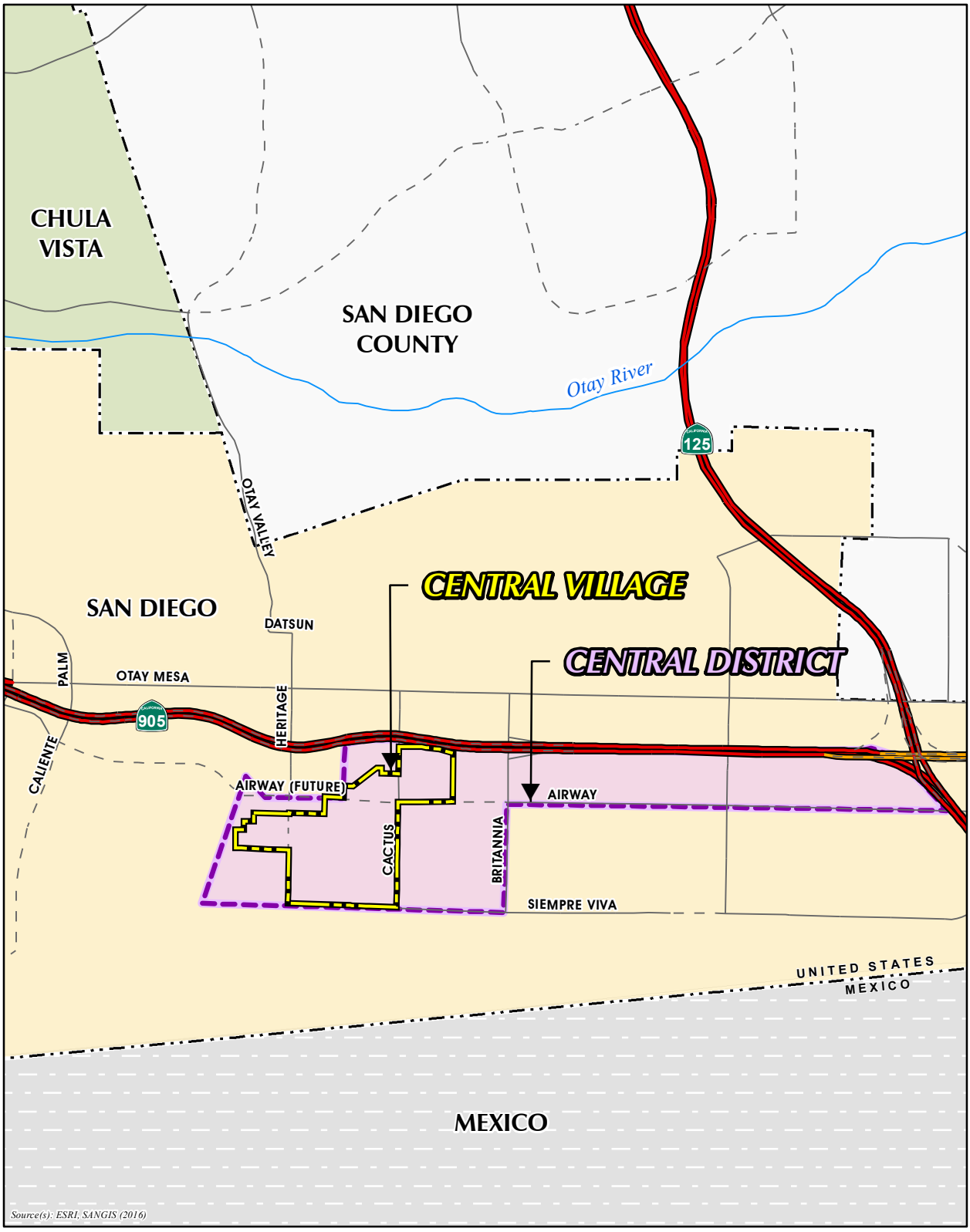


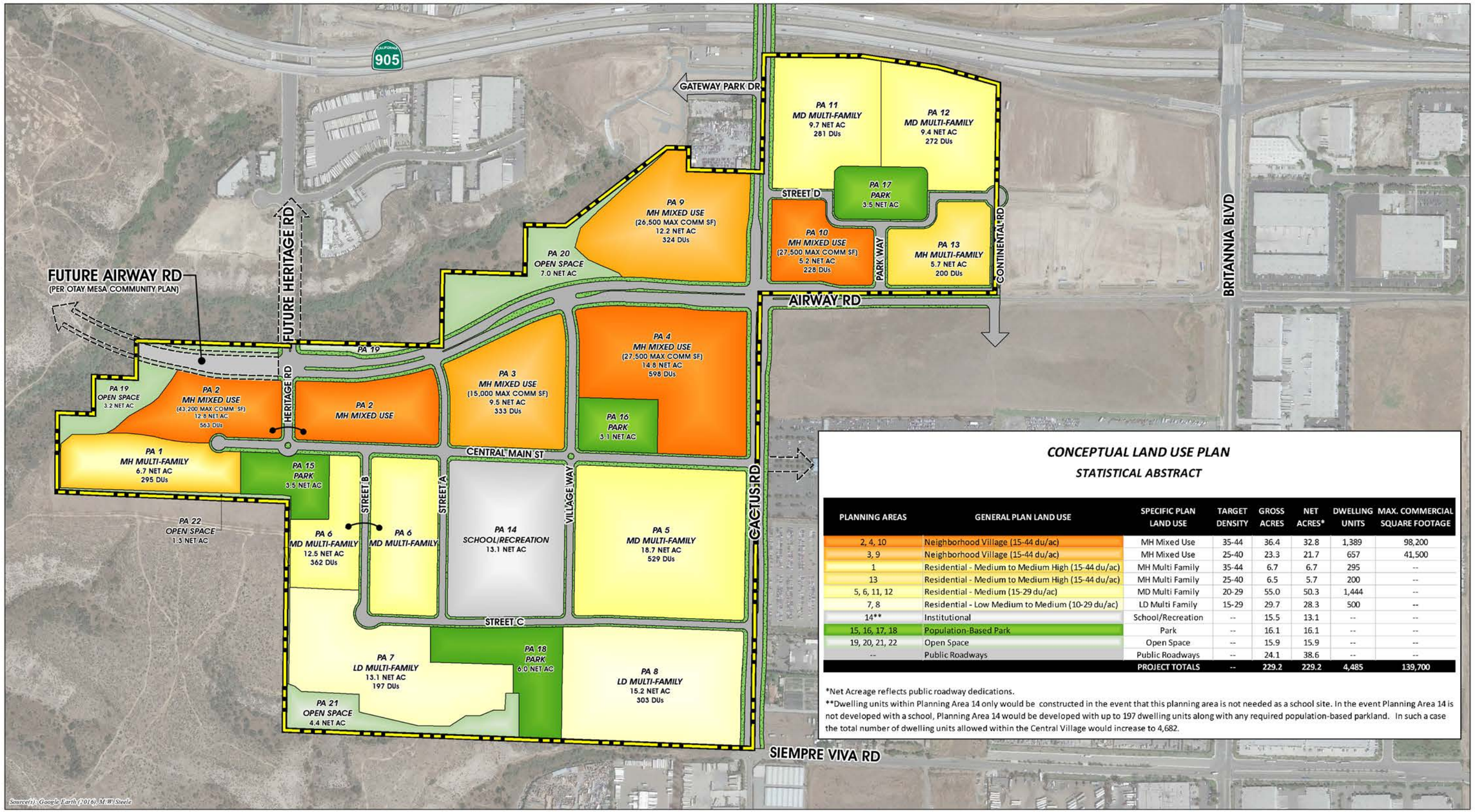
Figure 3

0 900 1,800 3,600 Feet

VICINITY MAP

Figure 4

AERIAL PHOTOGRAPH



CONCEPTUAL LAND USE PLAN
STATISTICAL ABSTRACT

PLANNING AREAS	GENERAL PLAN LAND USE	SPECIFIC PLAN LAND USE	TARGET DENSITY	GROSS ACRES	NET ACRES*	DWELLING UNITS	MAX. COMMERCIAL SQUARE FOOTAGE
2, 4, 10	Neighborhood Village (15-44 du/ac)	MH Mixed Use	35-44	36.4	32.8	1,389	98,200
3, 9	Neighborhood Village (15-44 du/ac)	MH Mixed Use	25-40	23.3	21.7	657	41,500
1	Residential - Medium to Medium High (15-44 du/ac)	MH Multi Family	35-44	6.7	6.7	295	--
13	Residential - Medium to Medium High (15-44 du/ac)	MH Multi Family	25-40	6.5	5.7	200	--
5, 6, 11, 12	Residential - Medium (15-29 du/ac)	MD Multi Family	20-29	55.0	50.3	1,444	--
7, 8	Residential - Low Medium to Medium (10-29 du/ac)	LD Multi Family	15-29	29.7	28.3	500	--
14**	Institutional	School/Recreation	--	15.5	13.1	--	--
15, 16, 17, 18	Population-Based Park	Park	--	16.1	16.1	--	--
19, 20, 21, 22	Open Space	Open Space	--	15.9	15.9	--	--
--	Public Roadways	Public Roadways	--	24.1	38.6	--	--
		PROJECT TOTALS	--	229.2	229.2	4,485	139,700

*Net Acreage reflects public roadway dedications.
**Dwelling units within Planning Area 14 only would be constructed in the event that this planning area is not needed as a school site. In the event Planning Area 14 is not developed with a school, Planning Area 14 would be developed with up to 197 dwelling units along with any required population-based parkland. In such a case the total number of dwelling units allowed within the Central Village would increase to 4,682.

0 137.5 275 550 Feet

Figure 5

CENTRAL VILLAGE SPECIFIC PLAN LAND USE PLAN

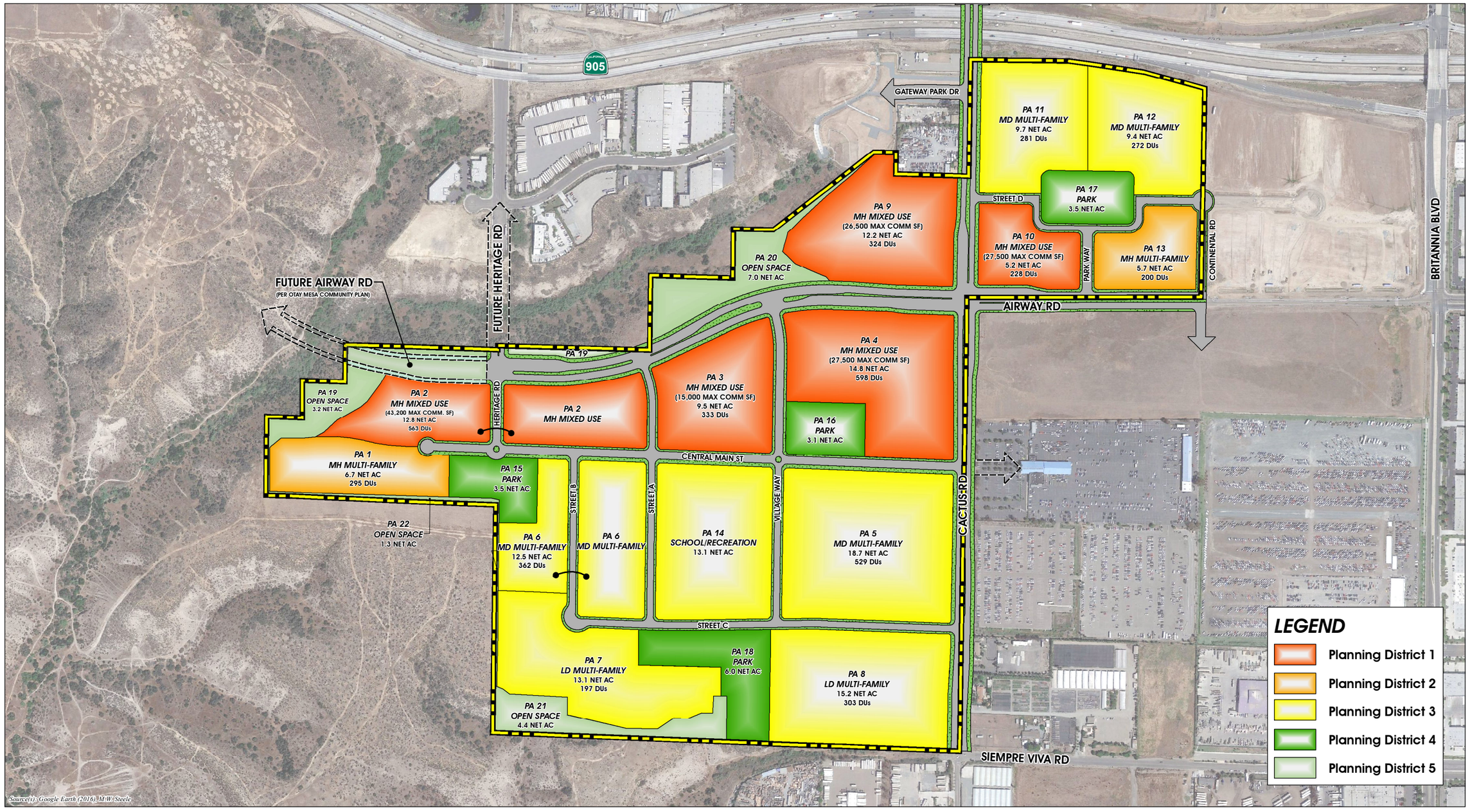
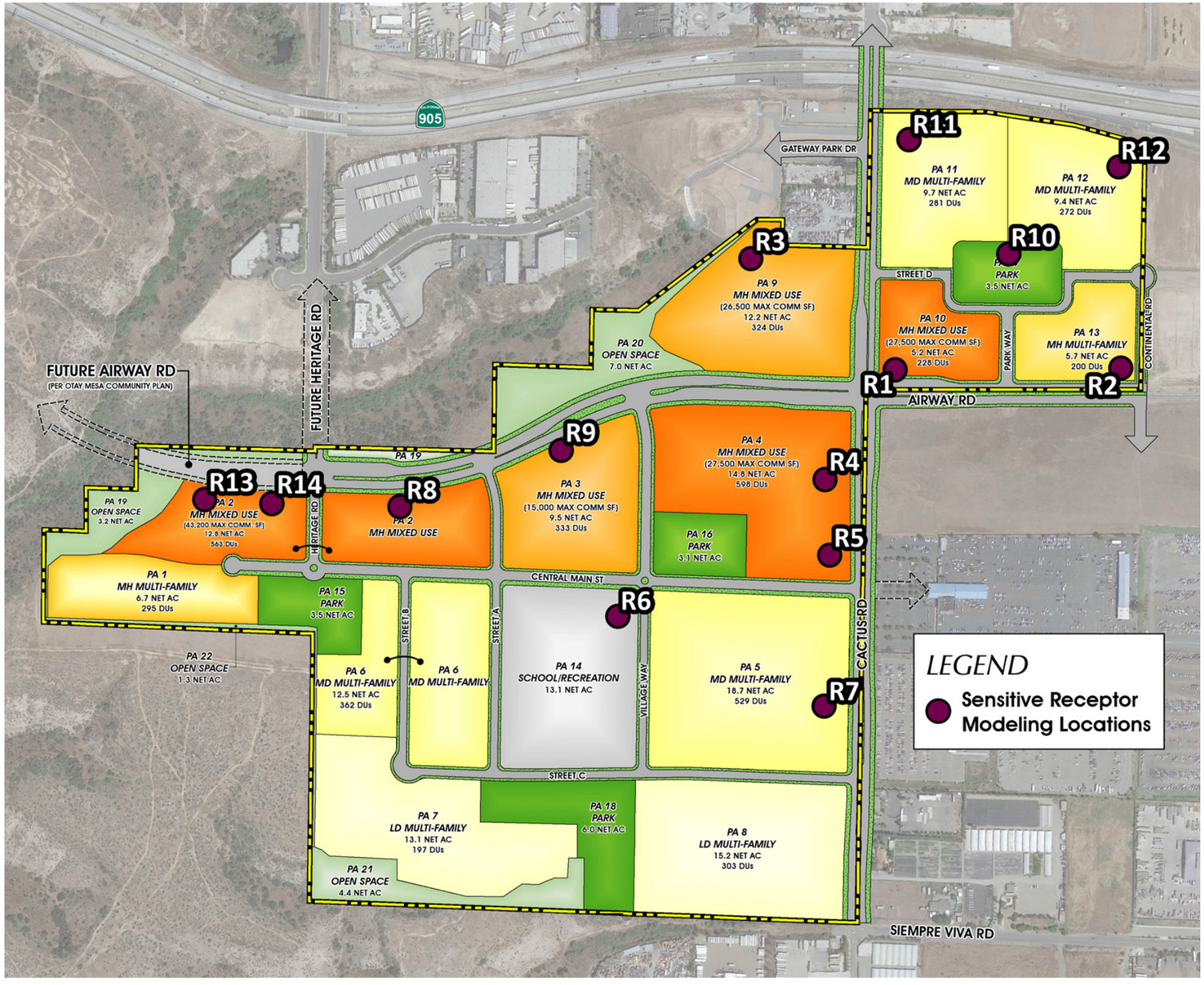


Figure 6

PLANNING DISTRICTS MAP



Source(s): Ldn Consulting (January 19, 2017)

Figure 7

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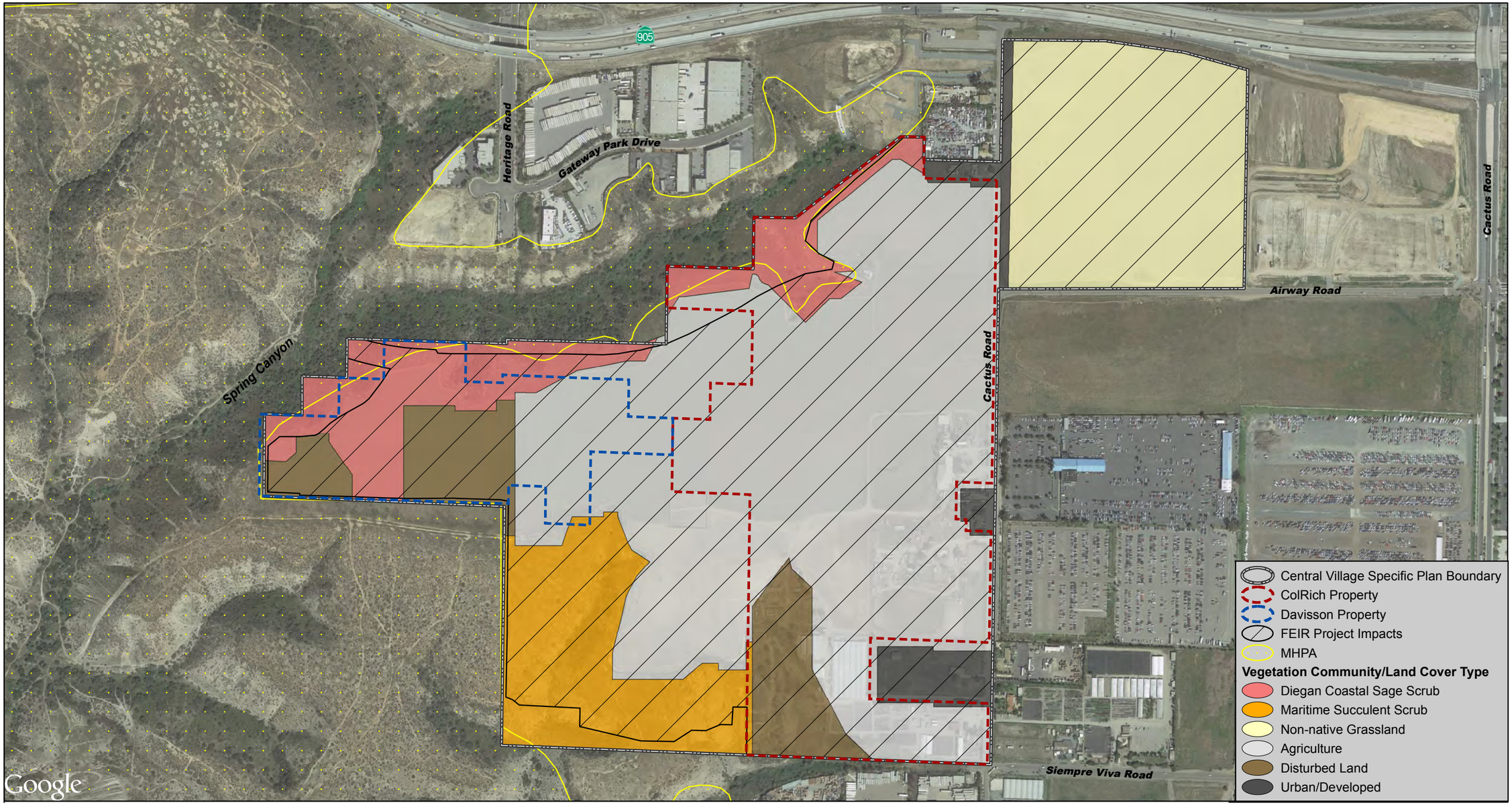
CENTRAL VILLAGE SENSITIVE RECEPTOR MODELING LOCATIONS



Source(s): Alden Environmental, Inc. (October 2016)

Figure 8

PLANNING

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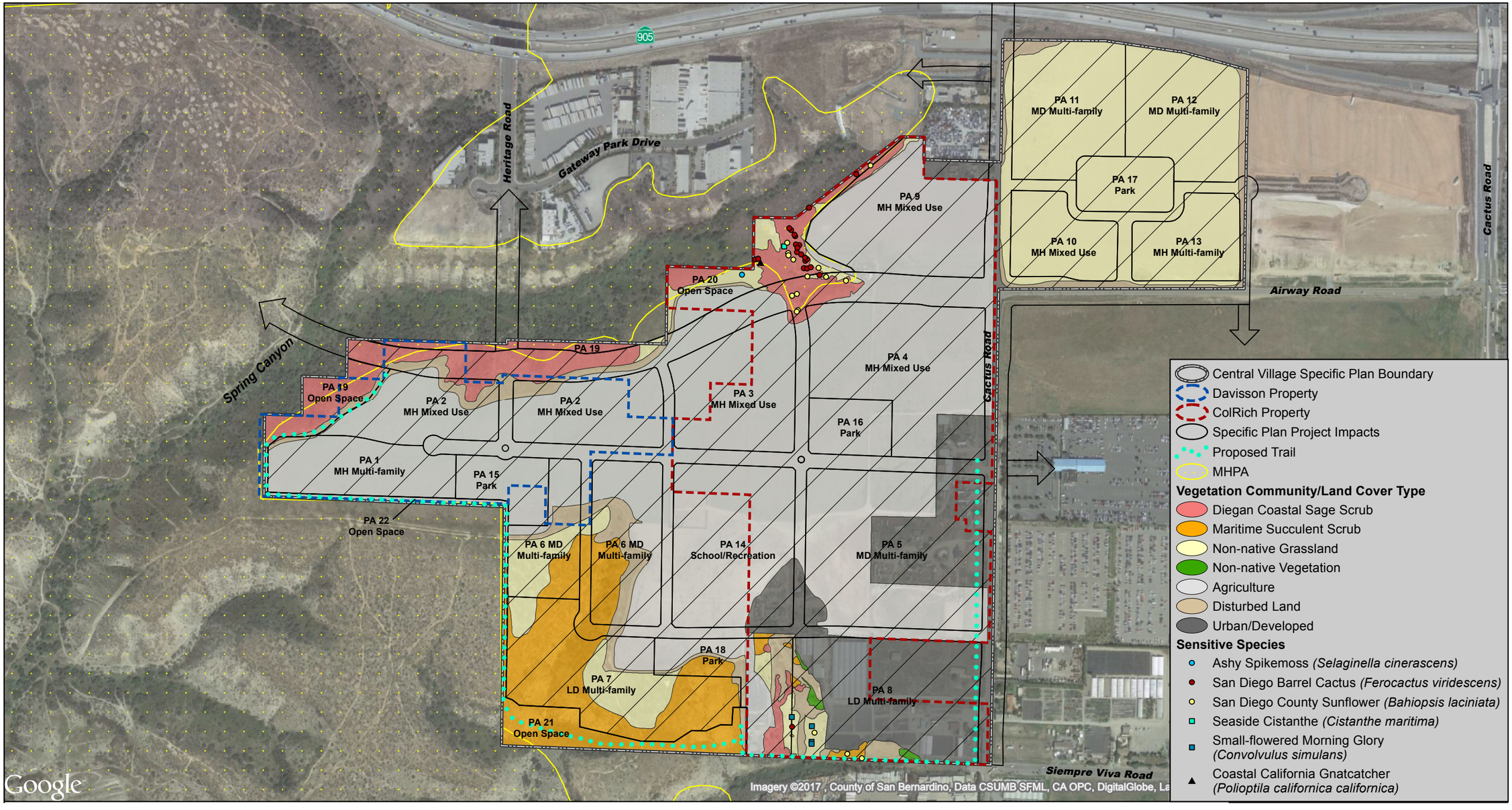
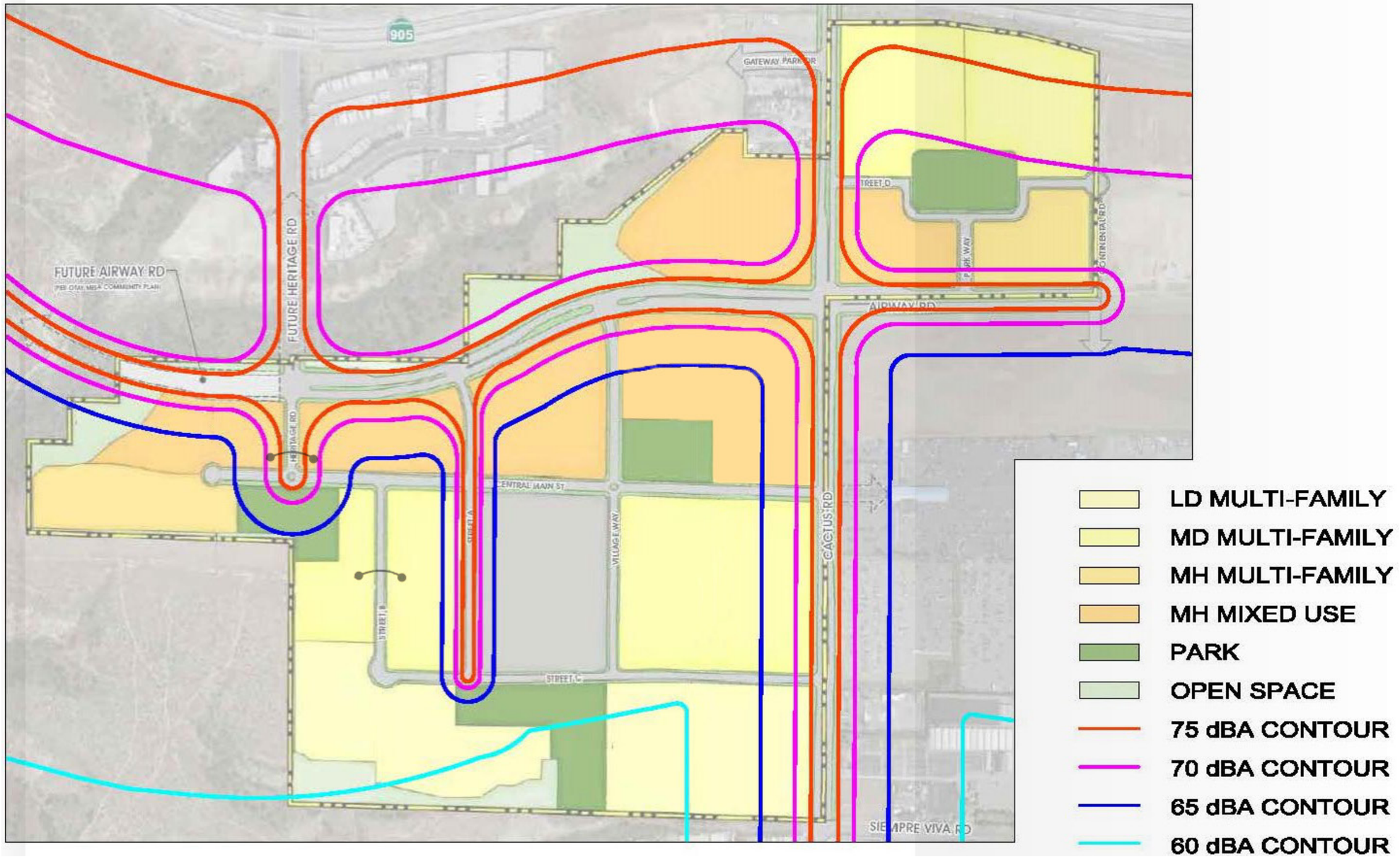
EIR VEGETATION COMMUNITIES AND LAND COVER TYPES/IMPACTS



Source(s): Alden Environmental, Inc. (March 2017)

Figure 9

CENTRAL VILLAGE VEGETATION COMMUNITIES, LAND COVER TYPES, AND SENSITIVE SPECIES/IMPACTS



Source(s): Ldn Consulting (January 19, 2017)

Figure 10

NOT TO SCALE

FUTURE (OMCPU AS AMENDED BY THE CVSP) TRANSPORTATION NOISE CONTOURS