

APPENDIX B
ENVIRONMENTAL POLICY AND CONSISTENCY ANALYSIS

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<p style="text-align: center;">Table 1 Chula Vista General Plan Policy Consistency Analysis</p>		
Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Land Use and Transportation Element (2005)		
Objective – LUT 1	Provide a balance of residential and non-residential development throughout the City that achieves a vibrant development pattern, enhances the character of the City, and meets the present and future needs of all residents and businesses.	Under the No Annexation Scenario, the Nakano Project (project) would assist the City of Chula Vista in achieving residential development in proximity to non-residential uses such as healthcare and commercial uses. The project would meet the needs of the City by contributing recreational amenities and housing units to achieve the City’s recreation and housing goals.
Objective – LUT 5	Designate opportunities for mixed use areas with higher density housing that is near shopping, jobs, and transit in appropriate locations throughout the City.	The project includes residential uses in proximity to medical, commercial, open space, and other residential uses.
Objective – LUT 6	Ensure adjacent land uses are compatible with one another.	The project site is adjacent to residential developments within the City of San Diego’s Ocean View Hills community, which is comprised of a variety of residential and recreational uses. The design guidelines in the Nakano Specific Plan (Specific Plan) recognize and enhance the interface of the community by contributing additional recreational amenities and housing units that blend with its surrounding community.
Objective- LUT 7	Appropriate transitions should be provided between land uses.	The Specific Plan includes minimum setbacks and buffers from neighboring uses to ensure compatible land uses and edge transitions.
Objective – LUT 10	Create attractive street environments that complement private and public properties, create attractive public rights-of-way, and provide visual interest for residents and visitors.	The Specific Plan includes design guidelines intended to create attractive development that compliments surrounding developments and provides visual interest for residents and visitors. The design guidelines provide guidance on building massing, materials and colors, architectural styles, and product design.

**Table 1
Chula Vista General Plan Policy Consistency Analysis**

Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Objective – LUT 16	Integrate land use and transportation planning and related facilities.	The project’s internal roadways would provide connections to the residential developments of the project and provide access to and from the community.
Policy LUT 16.1	Promote the development of well-planned communities that will tend to be self-supportive and, thus, reduce the length of vehicular trips, reduce dependency on the automobile, and encourage the use of other modes of travel.	The project is located adjacent to Interstate 805 (I-805), other existing residential development, and medical offices. The project includes Project Design Features (PDFs) such as pedestrian network improvements would improve connectivity between the internal neighborhood to reduce reliance on automobiles (PDF-GHG-4). Additionally, the project would provide pedestrian amenities along the project frontage on Dennery Road which would assist in the pedestrian experience of walking to nearby bus stops. Bicycle network improvements include construction of internal buffered Class II bike lanes along Private Street ‘A’ and sharrows along the private streets leading east and west from the primary roadway, which would also provide an alternative to automobile use.
Policy LUT 16.2	Ensure that new development and community activity centers have adequate transportation and pedestrian facilities.	See analysis under Policy LUT 16.1.
Objective – LUT 17	Plan and coordinate development to be compatible and supportive of planned transit.	There are currently no planned transit improvements along Dennery Road or Palm Avenue. The project is obligated to pay its fair share towards community planned classification improvements.
Policy LUT 17.2	Direct higher intensity and mixed-use developments to areas within walking distance of transit, including San Diego Trolley stations along E, H, and Palomar streets, and new stations along future transit lines, including Bus Rapid Transit (BRT).	Metropolitan Transit System lists Bus Routes 933 and 934 within a half-mile walking distance from the project access. There are four bus stops within the half-mile walking distance of the project driveway; two are on Palm Avenue and two are on Dennery Road.

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Policy LUT 17.4	Require developers to consult and coordinate with San Diego Association of Governments (SANDAG) and the City to ensure that development is compatible with and supports the planned implementation of public transit.	The project would be consistent with SANDAG’s Regional Plan, which aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking. The project location is technically within a half-mile (as the crow flies) of Transit Priority Area that is located within the City of Chula Vista. However, there is no formal access and no Americans with Disability Act-compliant access to the bus stops on Main Street due to undeveloped land and Otay River, which are is located between the project site and access to Main Street; therefore, the project is not considered to have reasonable access to a Transit Priority Area. Therefore, no further consultation or coordination is necessary.
Objective LUT 18	Reduce traffic demand through Transportation Demand Management (TDM) strategies, increased use of transit, bicycles, walking, and other trip reduction measures.	Potential TDM measures to be implemented in the form of project design features would result in incremental reductions in Vehicle Miles Traveled per capita. Additionally, the project would provide pedestrian amenities along the project frontage on Dennery Road which would assist in the pedestrian experience of walking to nearby bus stops. Bicycle network improvements include construction of internal buffered Class II bike lanes along Private Street A and sharrows along the private streets leading east and west from the primary roadway, which would also provide an alternative to automobile use. Furthermore, the project would be required to implement GHG related mitigation measures including GHG-CV-1/GHG-SD-1, GHG-CV-2/GHG-SD-2, and GHG-CV-3/GHG-SD-3, which would require subsidized transit passes, implementation of a commuter trip reduction program, and providing bicycles to residents, respectively.

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Chula Vista General Plan Policy Consistency Analysis**

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Policy LUT 18.1	Support and encourage the use of public transit.	See analysis under Policy LUT 18.
Policy LUT 18.3	Provide and enhance all feasible alternatives to the automobile, such as bicycling and walking, and encourage public transit ridership on existing and future transit routes.	See analysis under Policy LUT 18.
Objective LUT 21	Continue efforts to develop and maintain a safe and efficient transportation system with adequate roadway capacity to serve future residents, while preserving the unique character and integrity of recognized communities within the City.	The project would include the construction of new street connections, sidewalks, paseos, trail connections, and bicycle facilities that would serve residents and visitors. These mobility improvements would tie into the existing local and regional mobility network. Additionally, as a residential project that would not change the existing roadway network, the project would not result in a hazardous roadway design or unsafe roadway configuration.
Objective – LUT 23 and Objective – LUT 73	<p>Promote the use of non-polluting and renewable alternatives for mobility through a system of bicycle and pedestrian paths and trails that are safe, attractive and convenient forms of transportation.</p> <p>Promote alternative modes of transportation, which are intended to encourage a healthy lifestyle and reduce reliance on the automobile, and support the viability of transit through land use distribution and design.</p>	The project includes mobility improvements such as sidewalks, paseos, trail access points, and bicycle facilities to encourage alternatives to the automobile. The project includes a number of project design features including pedestrian network improvements and bicycle improvements. Additionally, proposed mitigation measures for greenhouse gas (detailed in Section 4.5.4.1.d) would ensure all residents are provided with transit pass subsidies, and every resident is provided up to \$400 for purchase of a bicycle to encourage transit use. A commute trip reduction program is also proposed that would ensure each resident is provided with a one-page flyer every year that provides information regarding available transit, designated bicycle routes, local bicycle groups and programs, local walking routes and programs, and rideshare programs.
Policy LUT-23.1	Encourage the use of bicycles and walking as alternatives to driving.	See analysis under Policy LUT 18.

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Policy LUT-23.2	Foster the development of a system of inter-connecting bicycle routes throughout the City and region.	The project would provide a publicly accessible connection along its western boundary, offering a connection to the south to the existing bicycle network that connects to a freeway shoulder bike facility along I-805 between Palm Avenue in the City of San Diego and Main Street in the City of Chula Vista. The project would also provide trail improvements along the Otay River, supporting completion of a regional trail network that provides access to the City of Chula Vista.
Policy LUT-23.5	Provide linkages between bicycle facilities that utilize circulation element alignments and open space corridors.	The proposed internal streets would have sidewalks and landscaped paseos that would provide connections to the proposed pocket parks, as well as trail access to the Otay Valley Regional Park (OVRP).
Policy LUT-23.8	Provide and maintain a safe and efficient system of sidewalks, trails, and pedestrian crossings.	Neighborhoods within the project site would be linked via sidewalks, paseos, bicycle amenities, and a continuous street network that would accommodate a variety of living styles and mobility options. Internal mobility and pedestrian access to Dennery Road would ensure accessible pedestrian access to bus stops located along Palm Avenue and Dennery Road.
Policy LUT-23.14	Require new development projects to provide internal bikeway systems with connections to the citywide bicycle networks.	Bicycle network improvements include construction of internal buffered Class II bike lanes along Private Street A and sharrows along the private streets leading east and west from the primary roadway (see PDF-GHG-5 Bicycle Network Improvements). See analysis under Policy LUT-23.2 regarding connectivity.

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Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Environmental Element (2005)		
Objective – E 1 and Objective – E 1.1	Conserve Chula Vista’s sensitive biological resources. Implement the Chula Vista MSCP Subarea Plan.	The project minimizes impacts to sensitive resources to the maximum extent practical. The project incorporates an avoidance buffer from on-site jurisdictional areas to ensure protection of the on-site drainage. Biological resource avoidance and mitigation measures are detailed in the EIR Section 4.3.3.1.d and 4.3.4.1.d.
Objective E 2	Protect and improve water quality within surface water bodies and groundwater resources within and downstream of Chula Vista.	<p>The project would implement project-specific site design, source control, treatment control best management practices (BMPs) consistent with federal, regional, and local water quality standards including the National Pollutant Discharge Elimination System (NPDES) permit, Construction General Permit (CGP), and City of Chula Vista General Plan policies, plans, and threshold standards to protect surface water body water quality.</p> <p>The project would not impact ground water sources during construction or operations of the project. Based on the lack of shallow groundwater, it is not anticipated that groundwater would be encountered during construction activities within the project site. Additionally, because stormwater BMPs would be designed to prevent infiltration on-site, the project would not impact groundwater.</p>
Policy E 2.3	Educate residents, business owners and City departments about feasible methods to minimize the discharge of pollutants into natural drainages and the municipal storm drainage system.	The proposed water quality BMPs would require ongoing maintenance by the Homeowners’ Association to ensure long-term operations would continue to provide water quality control. Management would include education to residents to control trash and ensure no illicit discharges to the storm drain system.

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Policy E 2.4	Ensure compliance with current federal and state water quality regulations, including the implementation of applicable NPDES requirements and the City's Pollution Prevention Policy.	The project would implement project-specific site design, source control, treatment control BMPs consistent with federal, regional, and local water quality standards including the NPDES permit, CGP, and City of Chula Vista General Plan policies, plans, and threshold standards to protect surface water body water quality.
Policy E 2.5	Encourage and facilitate construction and land development techniques that minimize water quality impacts from urban development.	Run-off during construction activities would be minimized through implementation of BMPs recommended in the project Storm Water Pollution Prevention Plan (SWPPP), as requirement of the NPDES permit. As detailed above, construction BMPs would typically include street sweeping, waste disposal, vehicle and equipment maintenance, designated concrete washout area, designated materials storage areas with runoff protection, minimization of hazardous materials, and proper handling and storage of hazardous materials. The hydromodification management plan includes permanent BMPs (two lined biofiltration basins and a detention vault upstream of a modular wetland unit) would temporarily store the increased runoff, allowing saturation, before release.
Objective – E 3.2 and Objective – E 3.3	<p>Promote the use of low water demand landscaping and drought tolerant plant materials in both existing and new development.</p> <p>Where safe and feasible, promote and facilitate the continued use of recycled water in new developments, and explore opportunities for the use of recycled water in redevelopment projects.</p>	The project would utilize drought-tolerant native vegetation, planted in an informal pattern. All permanent irrigation systems within the project shall be below ground, automatically controlled, and in full compliance with building code requirements. Reclaimed water is not available to the project site; however, water conserving systems such as drip irrigation, moisture sensors, low gallonage heads, and matched precipitation rate heads will be used.

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Objective – E 6	Improve local air quality and reduce greenhouse gas emissions by minimizing the release of air pollutants and toxic air contaminants and limiting the exposure of people to such pollutants.	Diesel equipment used during construction would be subject to the California Air Resources Board’s Airborne Toxic Control Measures (ATCM) for in-use off-road diesel fleets, which would minimize diesel particulate matter emissions and exposure.
Policy E 6A	Explore opportunities for improving indoor air quality.	MERV 13 filters are required for residential construction in accordance with the 2022 Title 24 California Building Code (CBC). All residences would be equipped with MERV 13 filters to improve indoor air quality.
Policy E 6B	Prioritize greening efforts to keep air, water, and land clean.	Implementation of such PDFs as PDF-AQ-2 No Fireplaces, PDF-BIO-1 Wetland Buffer, PDF-GHG-3 Electric Appliances, PDF-GHG-9 Electric Vehicle Charging Capacity, PDF-UTIL-1 Waste Management Plan (WMP), etc. reflects the project’s greening efforts in keeping air, water, and land clean.
Policy E 6.1	Encourage compact development featuring a mix of uses that locate residential areas within reasonable walking distance to jobs, services, and transit.	Surrounding land uses include the Otay River to the north, residential development to the east, I-805 to the west, and a Kaiser Permanente medical facility to the south. The project proposes a residential community in reasonable proximity to transit, jobs, and services in the City of Chula Vista and City of San Diego communities.
Policy E 6.2	Promote and facilitate transit system improvements in order to increase transit use and reduce dependency on the automobile.	The project-specific Local Mobility Analysis (LMA) is intended to identify the transportation effects of proposed development projects and to determine the need for any improvements to the adjacent and nearby road system to achieve acceptable mobility for vehicles, bicyclists, pedestrians, and transit. Should the LMA find that road improvements would be necessary to maintain acceptable mobility standards, such improvements would be included as project design features and the analysis of potential impacts would be included as part of the project’s California

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		<p>Environmental Quality Act (CEQA) analysis. However, there would not be an impact as found by the LMA that would impact transit use adversely and therefore the project would not facilitate transit system improvements.</p>
Policy E 6.3	Facilitate the use of alternative fuel and low- and zero-emission vehicles and equipment in the community.	<p>Vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Project fuel consumption would decline over time beyond the initial operational year of the project as a result of continued implementation of increased federal and state vehicle efficiency standards. The project would be in compliance with the California Green Building Code 2022 (Section 4.106.4 Electric Vehicle charging for new construction).</p> <p>Per PDF-GHG-3, the project would include all electric appliances and heating systems. Woodburning and natural gas/propane shall be prohibited on-site.</p> <p>In addition, implementation of PDF-GHG-9 Electric Vehicle Charging Capacity would install a listed raceway in each unit's garage to accommodate a dedicated 208/240-volt branch circuit. The raceway shall originate at the main service or subpanel and shall terminate in the garage to allow for electric vehicle charging, thus facilitating the use of low and zero emission vehicles by residents.</p>
Policy E 6.7	Encourage innovative energy conservation practices and air quality improvements in new development and redevelopment projects consistent with the City's Air Quality Improvement Plan Guidelines or its equivalent, pursuant to the City's Growth Management Program.	<p>The project has incorporated a number of PDFs that support energy conservation and reduced air emissions including using all electric appliances and incorporating PDFs that support reduced vehicle miles traveled.</p>

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Policy E 6.9	Discourage the use of landscaping equipment powered by two-stroke gasoline engines within the City and promote less-polluting alternatives to their use.	Landscaping maintenance includes fuel combustion emission from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chainsaws, and hedge trimmers as well as air compressors, generators, and pumps. However, the use of electric-powered landscaping equipment would be encouraged through implementation of PDF-GHG-6, which requires installation of outdoor electrical outlets.
Policy E 6.10	The siting of new sensitive receptors within 500 feet of highways resulting from development or redevelopment projects shall require the preparation of a health risk assessment as part of the CEQA review of the project. Attendant health risks identified in the Health Risk Assessment (HRA) shall be feasibly mitigated to the maximum extent practicable, in accordance with CEQA, in order to help ensure that applicable federal and state standards are not exceeded.	A detailed HRA was performed to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors as a result of diesel emissions from I-805 on future sensitive receptors of the project. As shown, the diesel particulate matter emissions from I-805 would result in a Residential Maximum Individual Cancer Risk of 25.60 in 1 million which would exceed 10 in 1 million, which is the level at which the San Diego Air Pollution Control District (SDAPCD) generally requires public notification for stationary sources of emissions. The Residential Chronic Hazard Index of 0.007 would be below the level of 1.0 at which adverse non-cancer health risks would be anticipated. No mitigation is required.
Policy E 6.11	Develop strategies to minimize CO hot spots that address all modes of transportation.	Carbon monoxide (CO) at intersections would not result in localized high concentrations of CO. The maximum CO concentration predicted for the 1-hour averaging period at the studied intersections ([1] Palm Avenue and Dennerly Road and [2] Palm Avenue and I-805 northbound ramps) would be 1.7 parts per million, which is below the 1-hour CO California Ambient Air Quality Standards of 20 parts per million.
Policy E 6.12	Promote clean fuel sources that help reduce the exposure of sensitive uses to pollutants.	See analysis under Policy E 6.3, E 6.5, and E 6.9.

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Policy E 6.13	Encourage programs and infrastructure to increase the availability and usage of energy-efficient vehicles, such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels.	Implementation of PDF-GHG-9 Electric Vehicle Charging Capacity would install a listed raceway in each unit's garage to accommodate a dedicated 208/240-volt branch circuit. The raceway shall originate at the main service or subpanel and shall terminate in the garage to allow for electric vehicle charging, thus facilitating the use of low and zero emission vehicles by residents.
Policy E 6.15	Site industries and other stationary emitters in a way that minimizes the potential impacts of poor air quality on homes, schools, hospitals, and other land uses where people congregate, and disadvantaged populations.	The project is not a stationary source that emits quantities of pollutants that are harmful to sensitive receivers, nor would the project involve industries that would have the potential to. Not applicable to the project.
Policy E 6.16	Encourage the use of bicycles through support of bike share opportunities, community bike programs, and the provision of bicycle parking opportunities such as bike racks and bike lockers.	The project includes PDF-GHG-5 Bicycle Network Improvements which would construct bike lanes along Private Street A and sharrows along private streets and GHG-SD-3 Bicycle Micro-mobility Fleet which would provide one bicycle per unit to the first buyer of each unit. Bicycle racks would be located at pocket parks.
Objective – E 7	Promote energy conservation through the efficient use of energy and through the development of local, non-fossil fuel-based renewable sources of energy.	The project would comply with all applicable energy conservation measures including Title 24 Building Energy Standards.
Policy E 7.1	Promote development of regulations and building design standards that maximize energy efficiency through appropriate site and building design and through the use of energy-efficient materials, equipment, and appliances.	The project would be required to adhere to state regulations enforced to ensure energy efficiency and reduction of wasteful energy consumption, including the California Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6; California Energy Code) and the California Green Building Standards Code. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24

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		<p>Compliance Report to the local building permit review authority and the California Energy Commission. The 2022 California Green Building Standards Code institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements. The mandatory measures are related to planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.</p>
Policy E 7.8	<p>Ensure that residential and non-residential construction complies with all applicable City energy efficiency measures and other green building measures that are in effect at the time of discretionary permit review and approval or building permit issuance, whichever is applicable.</p>	<p>See analysis under Policy E 7.1.</p>
Policy E 8	<p>Minimize the amount of solid waste generated within the General Plan area that requires landfill disposal.</p>	<p>The project has prepared a WMP (see Appendix U) that demonstrates compliance with City of Chula Vista diversion standards. Construction waste would be diverted consistent with these requirements. To meet state waste reduction goals, the project would include waste reduction measures for operational waste to manage waste disposal. The project includes refuse, recyclable material, and organic material storage space within each residential unit's garage. With implementation of the organic material recycling collection and an assumption of 75 percent individual compliance, the project would achieve adequate organic waste diversion to support Statewide compliance with Senate Bill 1383 which</p>

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		requires diversion of 50 percent of organic waste prior to January 1, 2025, and 75 percent diversion thereafter.
Policy E 8.1	Promote efforts to reduce waste, minimize the need for additional landfills, and provide economically and environmentally sound resource recovery, management, and disposal facilities.	See analysis under Policy E 8 and E 8.3.
Policy E 8.3	Implement source reduction strategies, including curbside recycling, use of small collection facilities for recycling, and composting.	<p>A PDF (PDF-UTIL-1) has been included in the project description to require compliance with the project’s WMP in all scenarios, including program measures which requires (a) providing curbside recycling services to occupants, (b) requiring occupants to participate in a recycling program, (c) providing collection containers to occupants, (d) educating residents on recycling, and (e) prohibiting placing recyclable materials in a container not designated to receive those recyclable materials.</p> <p>For information on composting, see analysis under Policy E 8.</p>
Objective – E 10	Protect important paleontological resources and support and encourage public education and awareness of such resources.	Paleontological resources would be protected as detailed in the EIR Section 4.4, Geological and Paleontological Resources.
Objective – E 11 and Objective – E 12	<p>Improve Chula Vista’s open space and trails network, including the provision of additional internal connections between the various elements of the network.</p> <p>Provide connections between Chula Vista’s open space and trails network and the regional network.</p>	The project would emphasize trail connections to the OVRP for both residents and members of the surrounding community. An existing trail connection running along the western side of the project site would be retained and enhanced with decomposed granite surfacing to provide connection to the OVRP trail system. Within the project site, a sidewalk would parallel the existing trail access adjacent to the private drive. In addition to the north-south trail connection, the project would provide connections to an east-west connection to the OVRP trail system. In addition to

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		the existing western trail access that would remain, the project would provide two additional trail connections to the east-west trail north of the project boundary. The project provides a series of private drives, bicycle facilities, sidewalks and trails that tie into the existing regional transportation network and incorporation of an overlook park with trail access to the OVRP. Trail signage and a trail kiosk are proposed at the project entrance to notify users of the publicly available trail access through the project site.
Objective E 15	Minimize the risk of injury and property damage associated with flood hazards.	See analysis under Policy E 15.1.
Policy E 15.1	Prohibit proposals to subdivide, grade, or develop lands that are subject to potential flood hazards, unless adequate evidence is provided that demonstrates that such proposals would not be adversely affected by potential flood hazards and that such proposals would not adversely affect surrounding properties. Require site-specific hydrological investigations for proposals within areas subject to potential flood hazards; and implement all measures deemed necessary by the City Engineer to avoid or adequately mitigate potential flood hazards.	Portions of the project site are located within a 500-year floodplain; however, after project development, the elevations of the site would be raised in relation to the Otay River, bringing the site out of any area that would be subject to flooding. Chula Vista Municipal Code regulations prohibiting development of lands that are subject to potential flood hazards, unless adequate evidence is provided that demonstrates that such proposals would not be adversely affected by potential flood hazards (Chula Vista Municipal Code Section 14.18, et al.).
Objective E 16	Minimize the risk of injury and property damage associated with wildland fire hazards.	Although the project would be subject to fire risk and associated release of pollutants in the event of a wildfire, the project would not exacerbate existing risk. The project would be in compliance with CBC Chapter 7A and would incorporate appropriate fuel management zones that serve to reduce fire intensity and flame lengths from advancing fire

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		through restricted vegetation and irrigated areas around the perimeter of structures.
Policy E 16-1	Implement brush management programs which are consistent with the Chula Vista MSCP Subarea Plan and the City's Urban-Wildland Interface Code, within urban development and open space interface areas in order to reduce potential wildland fire hazards. Brush management guidelines within the MSCP Subarea Plan and the Urban-Wildland Interface Code shall include limits and measures to prevent increased risk of erosion.	A typical landscape/fuel modification installation per the City of Chula Vista's Fire Code consists of a 50-foot-wide Zone 1 and a 50-foot-wide Zone 2 for a total of 100 feet in width. As discussed in Section 4.6.6.1, due to the constraints within the project site, the project includes a reduced fuel management zone in constrained areas but incorporates alternative fire-resistant materials and measures to provide fire protection functional equivalency as a full brush management zone. Figure 3-9 illustrates the fuel management zones in addition to proposed masonry and fire rated walls to enhance structural fire protection.
Objective E 18	Minimize the use of toxic products by residents and small businesses and facilitate the proper disposal of household hazardous waste.	Hazardous materials associated with the residential dwellings, associated landscape, and recreational uses would be limited to private use of commercially available cleaning products, landscaping chemicals and fertilizers, and various other commercially available substances. Although the project would introduce dwelling units to the site resulting in an increased use of commercially available potentially hazardous materials, the use of these substances would be subject to all applicable safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.
Policy E 18.1	Provide convenient and affordable household hazardous waste collection facilities and services for residents and small businesses, including City facilities, community collection events, and curbside collection.	A project design feature (PDF-UTIL-1) has been included in the project description to require compliance with the project's WMP in all scenarios, including program measures which requires (a) providing curbside recycling services to occupants, (b) requiring occupants to participate in a recycling program, (c) providing collection containers to

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		occupants, (d) educating residents on recycling, and (e) prohibiting placing recyclable materials in a container not designated to receive those recyclable materials.
Policy E 18.2	Minimize the use of toxic products by residents and small businesses through public education on alternative products and methods.	<p>A project design feature (PDF-UTIL-1) has been included in the project description to require compliance with the project's WMP in all scenarios, including program measure (d) which requires:</p> <ul style="list-style-type: none"> (d) Education. For multi-family residential facilities, and for single family residential facilities receiving recycling services through a Homeowners' Association, the responsible person shall ensure that persons are educated about the recycling services as follows: <ul style="list-style-type: none"> (1) Information, including the types of recyclable materials accepted and not accepted, the location of recycling containers, the recycling requirements, and the person's responsibility to recycle pursuant to this Division, shall be distributed to all occupants, employees, and contractors annually; (2) All new occupants shall be given information and instructions upon occupancy; and (3) All occupants shall be given information and instructions upon any change in recycling service to the facility.
Objective E 20	Ensure that facilities using, storing, and handling hazardous materials and waste do not result in significant adverse effects to existing and planned surrounding land uses.	General construction activities include transport of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents. These materials would be used and stored in designated construction staging areas within the boundaries of the

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		<p>project site, and once the proposed project has been constructed, any remaining materials would be transported off-site. These materials would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations pertaining to the management and use of hazardous materials.</p> <p>Although the project would introduce dwelling units to the site resulting in an increased use of commercially available potentially hazardous materials, the use of these substances would be subject to all applicable safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.</p>
Policy E 20.2	Through the environmental review of proposed developments, in accordance with CEQA, the City shall ensure that significant and potentially significant adverse effects from facilities using, storing, and handling hazardous materials and waste to existing and planned surrounding land uses will be avoided.	See analysis under Section 4.6.3 of the EIR and the analysis under Objective E 20.
Objective – E 22	Protect the community from the effects of transportation noise.	The Noise Technical Report (see Appendix L) concludes that noise related to vehicular traffic would not produce noise at a level that would affect nearby residents.
Policy E 21.1	Apply the exterior land use-noise compatibility guidelines listed in Table 9-2 of this Environmental Element to new development, where applicable, and in light of project-specific considerations.	An analysis using these exterior noise compatibility guidelines was completed for the project and is located within EIR Section 4.8 Noise. Although the adjacent residences would be exposed to construction noise levels that could be heard above ambient conditions, the exposure would be temporary and would not exceed the City of Chula Vista’s noise level limits. Property line

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Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
		noise levels due to on-site noise sources are not predicted to exceed the most restrictive noise level limits.
Policy E 22.5	Require projects to construct appropriate mitigation measures in order to attenuate existing and projected traffic noise levels, in accordance with applicable standards, including the exterior land use/noise compatibility guidelines listed in Table 9-2 of this Environmental Element.	As noted in the analysis within EIR Section 4.8 Noise, impacts would be less than significant and therefore not require mitigation. The project would result in direct noise level increases ranging from 0.4 to 0.9 decibels (dB) on Dennery Road, and a direct noise level increase of 0.1 dB on Palm Avenue. Cumulatively, when comparing future horizon year 2062 traffic noise levels to existing noise levels, the increase would range from 0.9 to 2.5 dB. The project would not result in a direct or cumulative noise increase of more than 3 dB. Therefore, the project would result in less than significant direct and cumulative impacts related to traffic noise
Public Facilities and Services Element (2005)		
Objective PFS 1	Ensure adequate and reliable water, sewer, and drainage service and facilities.	The project proposes the construction of a parallel 12-inch-diameter public water line in Dennery Road from the existing water regulating station at Sand Star Way up to the project frontage/entrance driveway to support the project's water demands. It would also construct connections to existing wastewater infrastructure as the analysis has determined new or expanded facilities would not be required. The project would also construct stormwater and drainage facilities on-site to manage stormwater flows and ensure drainage conditions are not substantially altered after development.

**Table 1
Chula Vista General Plan Policy Consistency Analysis**

Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Policy PFS 1.4	For new development, require on-site detention of storm water flows such that, where practical, existing downstream structures will not be overloaded. Slow runoff and maximize on-site infiltration of runoff.	The project would construct stormwater and drainage facilities on-site to manage stormwater flows and ensure drainage conditions are not substantially altered after development. Two biofiltration basins and a modular wetland unit with a detention vault would be constructed on-site to manage water quality and provide peak flow detention. The biofiltration basins would have an impermeable lining. Site runoff would outlet on the north end of the project site and sheet flow towards the Otay River.
Objective PFS 2	Increase efficiencies in water use, wastewater generation and its reuse, and handling of storm water runoff throughout the City through use of alternative technologies.	The project would incorporate water sustainable design features, techniques, and materials that would reduce water consumption including water efficient landscaping and building construction that incorporates high-efficiency plumbing fixtures and fittings in all structures consistent with the latest building code. The project would conform to the landscape plans which demonstrate compliance with City of Chula Vista Landscape Manual including drought-tolerant landscaping that would not require the excessive use of water, or pesticides and fertilizers and incorporation of highly efficient irrigation systems. Stormwater runoff would be reduced and managed through on-site detention vaults.
Objective PFS 4	Provide long-term wastewater treatment capacity to meet the needs of existing and new development in Chula Vista.	The existing infrastructure, to which the project would connect, has available capacity for the project's sewer flow and new or expanded facilities beyond those facility connections to be constructed on-site, would not be required.

<p style="text-align: center;">Table 1 Chula Vista General Plan Policy Consistency Analysis</p>		
Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Objective PFS 5	Maintain sufficient levels of fire protection and emergency medical service to protect public safety and property.	An analysis was completed for the project that assessed the ability of local fire protection and emergency services to maintain their response times. The addition of approximately 84 calls per year to San Diego Fire-Rescue Department Station Number 6's 2,252 call volume would slightly raise overall call volume, but is not anticipated to impact the existing fire station to a point that they cannot meet the demand.
Objective PFS 6	Provide adequate fire and police protection services to newly developing and redeveloping areas of the City.	The project area is served by the San Diego Police Department and San Diego Fire-Rescue Department Station Number 6.
Objective PFS 10	Efficiently locate and design school facilities.	As the project would be accommodated by existing area school facilities and would contribute school district fees to off-set the project's demand for school facilities, no new school facilities would be built as a result of the project.
Objective PFS 11	Provide a library system of facilities and programs that meets the needs of Chula Vista residents of all ages.	The City of Chula Vista specifically requires 500 gross square feet of library space, adequately equipped, and staffed, per 1,000 residents. According to the 2019 Growth Management Oversight Commission Annual Report, the current service ratio for FY 2019 was 350 square feet for every 1,000 residents. Therefore, the City of Chula Vista does not currently meet the standard for libraries. According to the City of Chula Vista Public Library Strategic Vision Plan, approximately 60,000 square feet of additional library space in the City of Chula Vista would meet the needs of the buildout population. Regardless of the facility funding arrangement, the project does not include the construction of any library facilities and the project residents would be closer to City of San Diego library facilities than Chula Vista library facilities in terms of demand on this service.

**Table 1
Chula Vista General Plan Policy Consistency Analysis**

Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Objective PFS 12	Efficiently locate and design library facilities.	See analysis under Objective PFS 11.
Objective PFS 15	Provide new park and recreation facilities for residents of new development, City-wide.	The project includes the construction of three pocket parks, public trail access to the OVRP and publicly accessible trail improvements.
Objective PFS 16	Develop active and passive recreational uses within portions of the Otay Valley Regional Park located within the City of Chula Vista, in accordance with the MSCP.	The Specific Plan includes a trailhead, trail kiosk and trail signage and offers public access and a trail access connection to the OVRP providing residents and visitors a link between the project and the OVRP. Refer to consistency discussion above for Land Use Element Objective – LUT 23 and Objective – LUT 73.
Objective PFS 25	Efficiently handle solid waste disposal throughout the city.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Policy PFS 25.1	Plan for adequate systems and facilities to manage the City's solid waste generation, treatment, and disposal.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Policy PFS 25.3	Participate in interjurisdictional efforts to maintain available landfill capacity in San Diego County.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Goal I–Waste Management	Efficient, economical, environmentally-sound waste collection, management, and disposal; Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Policy PF-I.2	Maximize waste reduction and diversion.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Policy PF-I.3	Provide environmentally sound waste disposal facilities and alternatives.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.

<p align="center">Table 1 Chula Vista General Plan Policy Consistency Analysis</p>		
Chula Vista General Plan Element Policy/Objective	Policy/Objective Text	Project Consistency Discussion
Policy PF-I.5	Plan for sufficient waste handling and disposal capacity to meet existing and future needs. Evaluate existing waste disposal facilities for potential expansion of sites for new disposal facilities.	See analysis under E 8, E 8.1, and E 8.3 regarding solid waste management for the project.
Policy PF-G.1	Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board National Pollutant Discharge Elimination System Permit standards.	The project's proposed stormwater system would be consistent with Clean Water Act and Regional Water Quality Control Board NPDES Permit standards, as detailed in Section 4.12.
Policy PF-G.4	Develop and employ a strategic plan for the City's watersheds to foster a comprehensive approach to storm water infrastructure improvements.	The San Diego Bay watershed includes the Otay Hydrologic Subarea where the project site is located. The San Diego Bay Water Quality Improvement Plan was developed and identified goals, strategies, and schedules to improve water quality throughout the watershed. It identifies priority conditions which require focused improvement plans. The additional purpose of the Water Quality Improvement Plan is to guide local Jurisdictional Runoff Management Programs towards achieving improved water quality. The Priority Conditions identified for the San Diego Bay Watershed, relevant to the project site are summarized in Table 4.12-1.
Growth Management Element (2019)		
Objective GM 1	Concurrent public facilities and services.	The EIR assessed the needs of the project and the demands on public facilities and services in Chapter 4.13 and determined that no new public facilities would be required as a result of the project.

Table 2 City of San Diego General Plan Policy Consistency Analysis		
City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Land Use and Community Planning Element (2015)		
A. City of Villages Strategy	Mixed-use villages located throughout the City and connected by high-quality transit.	The project does not include mixed use areas but includes multi-family residential uses in proximity to medical, commercial, open space, and other residential uses. There are four bus stops within a half-mile (as the crow flies) of the project. Two are on Palm Avenue and two are on Dennerly Road.
Policy LU-C.3	Maintain or increase the City's supply of land designated for various residential densities as community plans are prepared, updated, or amended.	Under Annexation Scenarios, the project would be rezoned to Residential Multiple Unit 1-1 (RM-1-1) and annexed into the City of San Diego which would increase the City's supply of land designated for residential density.
Policy LU-G.2	Submit all amendments and updates to the General Plan, community plans, specific plans, airport plans, development regulations and zoning ordinances affected by an airport influence area to the ALUC to ensure that they are consistent with the Airport Land Use Compatibility Plan or have the City Council take steps to overrule the ALUC.	The project is in proximity to Brown Field Municipal Airport. An application has been submitted to the Airport Land Use Commission (ALUC) to ensure the Project is consistent with the Brown Field Municipal Airport Land Use Compatibility Plan and the Airport Land Use Compatibility Overlay Zone. An email notice was sent by the City of Chula Vista to the ALUC on September 16, 2021. In response, it was noted that the project site is located outside the noise contours and safety zones of the Brown Field Municipal Airport ALUCP (Ed Gowens [San Diego County Regional Airport Authority] email to Janice Kluth [City of Chula Vista], September 17, 2021). Accordingly, no action from the ALUC or a determination of consistency with the ALUCP is required. The project would be consistent with this policy.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy LU-G.5	Implement the height standards used by the FAA as defined by Code of Federal Regulations	The proposed base zone regulations (RM-1-1) in the City of San Diego would incorporate a maximum building height of 30 feet. The project would be consistent with this policy.
Policy LU-G.6	Require that all proposed development projects (ministerial and discretionary actions) notify the FAA in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulation Title 14, Part 77.	The project is located within the Brown Field Airport Influence Area (Review Area 2 as shown in Figure 2-8). However, the project site is outside of the Brown Field safety compatibility maps areas and is not within a Part 77 Airspace Protection, Overflight, and Overflight Notification area. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas. A notice was sent to the ALUC on September 16, 2021. In response, it was noted that the project site is located outside the noise contours and safety zones of the Brown Field Municipal Airport Land Use Compatibility Plan and accordingly requires no action from the ALUC for a determination of consistency with the Airport Land Use Compatibility Plan.
Policy LU-H.1	Promote development of balanced communities that take into account community-wide involvement, participation, and needs.	The project would develop up to 221 residential dwelling units consisting of detached condominiums, duplexes, and townhome dwelling units on a 23.77-acre site. The City's General Plan 6th Cycle Housing Element (2021-2029) identifies a need for housing. The project would provide affordable housing (10 percent of the units will be designated as low-income housing units) within close proximity to schools, community recreational amenities, major transportation corridors, and existing infrastructure.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		<p>The project site is located in an area with access to public transit including I-805 to the west and State Route 905 to the south. Class II bike lanes are present along Dennery Road and Palm Avenue, providing a portion of the roadway for bicycle travel through lane striping and pavement markings. There is a high frequency bus line (Routes 933 and 934) with departures every 12 minutes at Palm Avenue and Dennery Road, 0.3 mile south of the project site. Neighborhoods within the project site would be linked via sidewalks, paseos, and bicycle amenities that would connect to external routes.</p> <p>The project features recreational amenities including several pocket parks and trail connections to the OVRP. Private open space is also provided for the individual use of each resident and includes private balconies and patios, front yards, back yards, and side yards. The amount of private open space meets the requirements of San Diego Municipal Code (SDMC) Section 131.0455.</p> <p>The range of housing proposed (in the current site plan) is composed of 61 detached condominiums, 84 duplexes, and 70 townhome dwelling units condominiums. The project would provide 10 percent of the total units, or 22 units, as affordable. A total of 11 units would be affordable-to-low-income households (five percent of the total) and 11 units would be affordable-to-moderate income households (five percent of the total).</p> <p>As such, the project would ensure a diverse and balanced neighborhood, as well as equitable</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		development, by providing housing that would provide affordable housing on a quality development site that contains homes of varying sizes and recreational activities. The project would be consistent with this policy as it relates the project.
Policy LU-H.2	Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration.	The project would provide 10 percent of the total units, or 22 units, as affordable. A total of 11 units would be affordable-to-low-income households (five percent of the total) and 11 units would be affordable-to-moderate income households (five percent of the total). The project would be consistent with this policy.
Policy LU-H.3	Provide a variety of housing types and sizes with varying levels of affordability in residential and village developments.	<p>The range of housing proposed (in the current site plan) is composed of 61 detached condominiums, 84 duplexes, and 70 townhomes dwelling unit condominiums. Specifically, the detached condominiums would be two-story, stand-alone, units that share no adjoining walls with neighboring units.</p> <p>The condominiums feature three to five bedrooms and attached two-bay garages. The condominiums units would range in size from approximately 1,761 to 2,135 square feet. Each unit would include a private driveway, backyard, and side yard.</p> <p>The duplexes would include two units stacked side-by-side within a two- or three-story structure. Each unit would include three to four bedrooms, 2.5 bathrooms, and a two-bay garage with private driveway. Duplex units would range in size from approximately 1,461 to 1,668 square feet.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		<p>The attached townhomes would consist of four to five units clustered in a row with no separation between units. Each townhome unit would include two to four bedrooms, two- to two-and-one-half bathrooms, and a two-bay garage. The townhome dwelling units would range in size from approximately 1,083 to 1,480 square feet.</p> <p>Overall, the project provides a variety of housing options. The project is consistent with this policy.</p>
Policy LU-H.6	Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	The project site is along Interstate 805 and would have a mobility network that provides access for people to walk, bike, drive and take transit. The surrounding network of streets, bike paths, sidewalks, and trails provide connections between the residential neighborhoods of the project and the commercial, retail, and public uses such as schools, parks, and transit facilities within the vicinity. The project would be consistent with this policy.
Policy LU-I.14	As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site-specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc.	A Health Risk Assessment (see Appendix C) was prepared for the site addresses the potential health risk related to residential use adjacent to I-805. The HRA finds that the roadway-generated toxic air contaminant emissions would result in a potential excess cancer risk at the maximally exposed residential receptor of 25.60 in a million, which would exceed the SDAPCD threshold of 10 in 1 million. The analysis factors in the typical amount of time spent indoors as well as the provision of MERV-13 filters as required by Title 24. Approximately half of the project site is located within 500 feet of I-805 and

<p style="text-align: center;">Table 2 City of San Diego General Plan Policy Consistency Analysis</p>		
City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		therefore, there is a potential health risk issue that would conflict with City of San Diego General Plan Policy LU-I.14.
Mobility Element (2015)		
Walkable Communities Goals	<p>A city where walking is a viable travel choice, particularly for trips of less than one-half mile. A safe and comfortable pedestrian environment.</p> <p>A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities. Greater walkability achieved through pedestrian friendly street, site and building design.</p>	<p>The project incorporates physical access for pedestrians via sidewalks, paseos, trails, and private drives; human scale design elements; street-engaging facades via walkways and visible front entries, and alley-loaded products. These mobility improvements tie into the existing local and regional mobility network. There are four bus stops within a half-mile (as the crow flies) of the project driveway, two on Palm Avenue and two on Dennery Road, which would facilitate transit usership. Regional commercial uses are located south of the site which offer services for routine errands.</p> <p>Additionally, the project will include a range of design techniques to enhance pedestrian safety and comfort, including but not limited to, shade trees and landscaping that reduce heat island issues, pedestrian-scaled lighting, and Americans with Disabilities Act-compliant sidewalks. Homeowners' Association protocols may be put in place to provide additional crime prevention techniques. The project would be consistent with this policy.</p>
Policy ME-A.1	Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1.	The project includes roadways with sidewalks, paseo, and trail connections to promote an inviting pedestrian-friendly street environment. Additionally, the project will include a range of design techniques to enhance pedestrian safety and comfort, including but not limited to, shade trees and landscaping that reduce heat island issues, pedestrian-scaled lighting and Americans

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		with Disabilities Act-compliant sidewalks. Homeowners Association protocols may be put in place to provide additional crime prevention techniques.
Policy ME-A.2	Design and implement safe pedestrian routes.	As part of the City of San Diego’s Systemic Safety - The Data-Driven Path to Vision Zero (2019) ² , to increase the visibility of traffic signals and reduce vehicles from proceeding through red lights, upgraded signal heads with backplates with retroreflective borders would be installed by the project at all intersection approaches to reduce hazards to crossing pedestrians. The proposed internal streets would have sidewalks and landscaped paseos that would provide connections to the proposed pocket parks, as well as trail access to the OVRP. Internal mobility and pedestrian access to Dennery Road would ensure accessible pedestrian access to bus stops located along Palm Avenue and Dennery Road.
Policy ME-A.4	Make sidewalks and street crossings accessible to pedestrians of all abilities.	The internal pedestrian pathway and sidewalks would be compliant with the Americans with Disabilities Act to provide safe and accessible pedestrian infrastructure.
Policy ME-A.5	<p>Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.</p> <ul style="list-style-type: none"> a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment. 	The project includes visual and physical access for pedestrians; pedestrian circulation via sidewalks, paseos, trails, and private drives; human scale design elements; street-engaging facades via walkways and visible front entries, and alley-loaded products. These mobility improvements tie into the existing local and regional mobility network. The project is within a half-mile walking distance to four Metropolitan Transit System bus stops, thus facilitating transit usership. Regional commercial uses are located just south of the site which offer

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		services for routine errands. The project would design driveways in consideration of pedestrian impacts.
Policy ME-A.6	Work toward achieving a complete, functional and interconnected pedestrian network.	Neighborhoods within the project site would be linked via sidewalks, paseos, bicycle amenities, and a continuous street network that would accommodate a variety of living styles and mobility options.
Policy ME-C.3	<p>Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts.</p> <p>c. Provide direct and multiple street and sidewalk connections within development projects, to neighboring projects, and to the community at large.</p>	The project is organized by new street connections, sidewalks, paseos, trail connections, and bicycle facilities that will serve residents and visitors. These mobility improvements will tie into the existing local and regional mobility network. All roadways in the development are interconnected and will be designed to meet City of San Diego standards. While the project will not be making any individual transit system improvements, it will have a mobility network that provides access for people to walk, bike, drive and take transit. The surrounding network of streets, bike paths, sidewalks, and trails provide connections between the residential neighborhoods of the project and the commercial, retail, and public uses such as schools, parks, and transit facilities within the vicinity. The project is designed with an interconnected street network that ties into the surrounding mobility network.
Policy ME.C-5	Install traffic calming measures as appropriate in accordance with site-specific recommendations which may include, but are not limited to, those identified on Table ME-2, to increase the safety and enhance the livability of communities.	See Policy ME.C-3. The project includes roadways with sidewalks, paseos, and trail connections to promote an inviting pedestrian-friendly street environment while encouraging vehicular traffic to slow down.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy ME-C.6	<p>Locate and design new streets and freeways and, to the extent practicable, improve existing facilities to: respect the natural environment, scenic character, and community character of the area traversed; and to meet safety standards.</p> <ul style="list-style-type: none"> a. Establish general road alignments and grades that respect the natural environment and scenic character of the area traversed. This could be accomplished through use of a modified or truncated grid system. b. Design roadways and road improvements to maintain and enhance neighborhood character. c. Design streets and highways that incorporate physical elements to improve the visual aspects of roadways. d. Preserve trees and other aesthetic and traffic calming features in the median and along the roadside. e. Avoid or minimize disturbances to natural landforms. f. Contour manufactured slopes to blend with the natural topography. g. Promptly replant exposed slopes and graded areas to avoid erosion. h. Employ landscaping to enhance or screen views as appropriate. i. Select landscape designs and materials on the basis of their aesthetic qualities, compatibility 	<p>The project is designed to be consistent with the surrounding area's community character and natural environment.</p> <p>The roadways would be designed to respect the natural environment and enhance community character. Roadway facilities would utilize physical elements including street trees, lighting, street furniture, bicycle racks, and signage and monumentation. These streetscape design elements would increase the positive visual quality of the community. The roadway design would also minimize frequent driveway cuts along sidewalks to improve visual aspects of roadways.</p> <p>The project would include substantial grading onsite. However, variable lot sizes, clustered housing, and stepped-back facades will be utilized, reducing the amount of grading. The edges of the development would include landscaped slopes that buffer the development from surrounding developments and open space areas. Additionally, the project includes brush management zones that require landscape and open space buffers that maintain a naturalized or softer edge to the residential development.</p> <p>Revegetated graded slopes would be planted to control erosion, provide privacy (screening), and blend in with the existing planting along the adjacent parkway. The plants used would be native, low fuel volume species that are in accordance with the approved plant palette. Views to the development from the OVRP shall be softened by</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<p>with the surrounding area, and low water demand and maintenance requirements.</p> <ul style="list-style-type: none"> j. Utilize signs, lights, furniture, and other accessories suitable for the location. k. Place utility lines underground. l. Emphasize aesthetics and noise reduction in the design, improvement, and operation of streets and highways. m. Avoid frequent driveway curb cuts that create conflict points between autos and pedestrians. 	<p>vegetated slopes landscaping along the northern boundary, adjacent to the OVRP.</p> <p>Utilities lines would be placed underground and would not conflict with street trees.</p>
Policy ME-C.8	<p>Implement Traffic Impact Study Guidelines that address site and community specific issues.</p> <p>Give consideration to the role of alternative modes of transportation and transportation demand management (TDM) plans in addressing development project traffic impacts.</p> <p>Consider the results of site-specific studies or reports that justify vehicle trip reductions (see also ME-E.7). Implement best practices for multi-modal quality/level of service analysis guidelines to evaluate potential transportation impacts and determine appropriate mitigation measures from a multi-modal perspective.</p>	<p>A Vehicle Miles Traveled Analysis (see Appendix M-1) was completed pursuant to the City of Chula Vista guidelines and in coordination with City of San Diego. Additionally, a Local Mobility Analysis was completed consistent with City of San Diego standards and guidelines. The project would be consistent with this policy.</p>
Policy ME-C.10	<p>Provide transportation facilities to serve new growth in accordance with Policies ME-K.4-K.6, and Public Facilities Element, Sections A-C.</p>	<p>The project provides bicycle, pedestrian, and automobile facilities. The multi-modal facilities would include connections to Dennery Road and from pocket parks to the nearby OVRP.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy ME-E.6	Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing Transportation Demand Management strategies.	The project would implement sidewalks, paseos, bicycle amenities and upgraded signal heads to reduce hazards to pedestrians and bicyclists. Internal mobility and pedestrian access to Dennery Road would ensure accessible pedestrian access to bus stops located along Palm Avenue and Dennery Road.
Policy ME-F.3	Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.	The project would provide buffered Class II bike lanes along Private Street A, the main private street running through the site. The buffered Class II bike lanes would separate bicycles from automobile traffic and link to the existing Class II bike lane along Dennery Road. The private streets leading east and west from the primary roadway would include bicycle sharrows, which are painted markings on the road surface to indicate to drivers that the road must be shared with bicycles. Bicycle improvements (bicycle loop detectors) are also proposed along Dennery Road at Red Fin Lane.
Policy ME.F-4	<p>Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses.</p> <ul style="list-style-type: none"> a. Continue to require bicycle parking in commercial and multiple unit residential zones. b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips. 	The project provides bicycle facilities including a separated Class I Bike Path along Private Drive A, which is the main Drive running through the project. The separated Bike Path buffers bicycles from automobile traffic and links to the Class II bike lane along Dennery Road. The private drives leading east and west from the primary roadway will include bicycle sharrows. Bicycle racks will be located at pocket parks. The project includes separated Bike Path that buffers bicycles from automobile traffic.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Urban Design Element (2008)		
Policy UD-A.1	<p>Preserve and protect natural landforms and features.</p> <ul style="list-style-type: none"> a. Protect the integrity of community plan designated open space. b. Continue to implement the Multiple Species Conservation Program (MSCP) to conserve San Diego's natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines. 	<ul style="list-style-type: none"> a. The project site is not currently within the City of San Diego's sphere of influence. Therefore, under the Annexation Scenarios, the project would not conflict with a community plan open space designation. b. The project site is currently located within the City of Chula Vista Subarea plan; however, under the Annexation Scenarios, an amendment to the City of San Diego Subarea Plan would be required to amend the Subarea Plan boundary to include the project site. Mitigation ratios provided by the City of Chula Vista MSCP Subarea Plan and City of San Diego Biology Guidelines are consistent between jurisdictions and therefore, the transfer would not affect conservation obligations and the project site would be equally protected. The project would avoid development within the southern portion of the site which supports an on-site drainage which would be protected through dedication of a covenant of easement restricting future development within this area. The project has been designed to not require brush management within the drainage. <p>The project would be consistent with this policy.</p>
Policy UD-A.2	<p>Use of open space and landscape to define and link communities.</p> <ul style="list-style-type: none"> a. Link villages, public attractions, canyons, open space, and other destinations together by connecting them with trail systems, bike ways, 	<p>The project would include several pocket parks and trail connections to the OVRP. An existing trail connection running along the western side of the project site would be retained as a 7-to-8-foot-wide trail enhanced with</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<p>landscaped boulevards, formalized parks, and/or natural open space, as appropriate.</p> <p>Preserve and encourage preservation of physical connectivity and access to open space.</p> <p>b. Recognize that open spaces sometimes prevent the continuation of transportation corridors and inhibit mobility between communities. Where conflicts exist between mobility and open space goals, site-specific solutions may be addressed in community plans.</p>	<p>decomposed granite surfacing to provide connection to the OVRP trail system.</p> <p>Two park areas are sited along the northern boundary to increase access and views toward the OVRP. The central overlook pocket park at the northern boundary would provide a trail connection to the OVRP. The pocket park at the northwestern corner of the site would offer two playground areas. An approximate 0.04-acre monument entry pocket park would be provided near the project entrance.</p> <p>No obvious conflicts exist between the placement of transportation corridors and existing open space.</p>
Policy UD-A.3	<p>Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <p>l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.</p> <p>n. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas.</p> <p>p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.</p>	<p>The project ensures that development adjacent to natural features (the Otay River) is sensitive to and complements the natural environment. The project would provide views from the project site toward the river from publicly accessible parks and would include a public trail connection to provide access to the trail network. The project would not substantially block any public views.</p> <p>CBC Chapter 7A regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a fire hazard area to reduce ignition potential. The project would be compliant with CBC Chapter 7.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy UD-A.5	Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.	The uncodified ordinance under Annexation Scenario 2a would include measures to ensure structures would be developed with a compatible height and bulk to avoid view blockage. Requirements for height variations and architectural elements would break up massing and scale. The uncodified ordinance would also serve to create a community visually consistent with surrounding residential neighborhoods.
Policy UD-A.6	Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.	As noted above under the analysis for Policy UD-A.5, the uncodified ordinance would guide development in a way that would create street frontages with architectural and landscape interest to enhance the environment at the pedestrian scale. Additionally, the project would provide pedestrian amenities along the project frontage on Dennery Road which would assist in the pedestrian experience of walking to nearby bus stops. The landscaping plan includes guidelines to enhance the streetscapes and pedestrian experience through amenities and plantings, including signage, streetscape furniture, and colorful accent and street plantings.
Policy UD-A.8	Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	All plantings, per the landscaping plans, would be drought tolerant, provide colorful accents, provide shade, and would provide necessary screening between public and private spaces. Landscape materials and design have been selected with aesthetic appeal in mind, including natural stone colors and warm wood tones, providing visual interest along streetscapes.
Policy UD-A.13	Provide lighting from a variety of sources at appropriate intensities and qualities for safety.	Lighting is proposed throughout the development for safety and aesthetic purposes. Pole-mounted lighting would be provided along private streets and bollard

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		lighting is proposed within the pocket parks along the northern end of the project site. Trail signage and vertical monument signage with lighting is proposed for wayfinding purposes.
Policy UD-B.1	Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.	The project site is surrounded by residential developments within the City of San Diego Ocean View Hills community, which consists of residential and recreational uses. The project would enhance the interface of the community by contributing additional recreational amenities and housing units that complement the surrounding community.
Policy UD-B.2	Achieve a mix of housing types within single developments.	The project provides a mix of housing types, including detached condominiums that would be two-story, stand-alone, units, duplexes which would include two units stacked side-by-side within a two- or three-story structure, and attached townhomes which would consist of four to five units clustered in a row with no separation between units. The townhomes would be two to three stories with varied roof pitching.
Policy UD-B.3	Design subdivisions to respect the existing lot pattern established within neighborhoods to maintain community character.	As noted in the analysis under Policy UD-B.1, the project has been designed to complement the surrounding community. The project reflects similar lot sizes and residential placement as surrounding communities.
Policy UD-B.4	Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.	See analysis under Policies UD-A.6 and UD-A.8.
Policy UD-B.5	Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.	The project includes on and off-site improvements to ensure adequate circulation and accessibility for pedestrians and bicyclists, in addition to being in proximity to existing Bus Stops 933 and 934. Internal mobility and pedestrian access to Dennery Road would

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<ul style="list-style-type: none"> d. Emphasize the provision of high-quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools. h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails. 	<p>ensure accessible pedestrian access to bus stops located along Palm Avenue and Dennery Road.</p> <p>Neighborhoods within the project site would be linked via sidewalks, paseos, bicycle amenities, and a continuous street network that would accommodate a variety of living styles and mobility options. The proposed internal streets would have sidewalks and landscaped paseos that would provide connections to the proposed pocket parks, as well as trail access to the OVRP.</p>
Policy UD-B.8	Provide usable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.	<p>Pocket parks would contribute to the projects common open space requirements. The project would include several pocket parks and trail connections to the OVRP. Two park areas would be sited along the northern boundary to increase access and views toward the OVRP. The central overlook pocket park at the northern boundary would provide a trail connection to the OVRP. The pocket park at the northwestern corner of the site would offer two playground areas.</p>
Public Facilities, Services, and Safety Element (2023)		
Policy PF-B.4	<p>Recommend development proposals to fully address impacts to public facilities and services.</p> <ul style="list-style-type: none"> a. Identify the demand for public facilities and services resulting from new development. b. Identify specific improvements and financing which would be provided the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. 	<p>The project has assessed the demands for public services within Chapter 4.13 and for utilities in Chapter 4.14. The project identifies the need for potable and non-potable water pipelines and infrastructure, sewer facilities, stormwater and drainage facilities. The project would connect to existing electrical power, natural gas, and communication systems. Demands for public services would increase with operation of the project, and assessments of the level of service for each public service were assessed for the project in Chapter 4.13. The</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<ul style="list-style-type: none"> c. Subject projects to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. d. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period. 	<p>project would provide parks and recreational facilities which would ensure compliance with parkland obligations.</p>
Policy PF-C.1	<p>Require development proposals to fully address impacts to public facilities and services:</p> <ul style="list-style-type: none"> a. Identify the demand for public facilities and services resulting from discretionary projects. b. Identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. c. Subject projects, as a condition of approval, to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. d. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period. 	<p>The project area is served by the San Diego Police Department and San Diego Fire- Rescue Department Station Number 6. Services and facilities provision would be coordinated closely between the City of Chula Vista and the City of San Diego through the Local Agency Formation Commission process and an annexation agreement that addresses service provision.</p> <p>As discussed in Section 4.13, implementation of the project would increase the demand for public services and facilities including police and fire protection services, parks and recreation facilities, schools, and libraries. However, the project would be adequately served by existing fire and police protection services and there would be no need to expand or build new police or fire facilities as a result of the project. The Otay Mesa Facilities Benefit Assessments/ Development Impact Fees collected from the project will be used, in part, to finance existing and planned fire facilities in Otay Mesa that would serve the project site.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		<p>The project would increase student enrollment at nearby schools. However, both school districts serving the project site have indicated adequate ability to provide for the student population that would be generated by the project. Additionally, the project would contribute school district fees to offset the project’s demand for school facilities.</p> <p>With respect to recreational facilities, the City of San Diego Parks and Recreation Master Plan (adopted August 2021) requires a level of service park standard of 100 Recreation Value Points per 1,000 population. This project will satisfy population-based park requirements by paying the Citywide Park Development Impact Fees. Finally, the project would increase the use of library facilities; however, the project would not result in the need for new or expanded libraries. The project would not result in any physical impacts associated with construction of library facilities as the project would be required to pay facility fees to offset the project’s demand for library services.</p> <p>The project would provide appropriate improvements and funding needed to support its needs for services and facilities. The project would be consistent with this policy.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-D.1	<p>Locate, staff, and equip fire stations to meet established response times as follows:</p> <ul style="list-style-type: none"> a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5-minute drive time in the most populated areas. b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time. 	<p>The project has demonstrated applicable response times can be met. See EIR Section 4.13.3.2.</p>
Policy PF-D.5	<p>Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.</p> <ul style="list-style-type: none"> a. Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or non-emergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities. 	<p>As stated therein, the demand for services associated with project build-out, approximately 84 calls per year, would not affect the ability of San Diego Fire-Rescue Department Station 6 to serve the project within response times. Additionally, the project would meet San Diego Fire-Rescue Department standards with respect to fire hydrants, water flow, and fire access.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-D.6	Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.	The EIR assessed the impact of the project on response times based on anticipated demand and existing facilities in Chapter 4.13.
Policy PF-D.12	<p>Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones. a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment. (see also LU-C.2.a.4).</p> <p>b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire.</p> <p>Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires.</p> <p>c. Provide and maintain water supply systems to supplies for structural fire suppression.</p> <p>d. Provide adequate fire protection. (see also PF-D.1 and PF-D.2)</p>	<p>The project site is located within a Very High Fire Hazard Severity Zone. Under Annexation Scenario 2a, the project would be subject to applicable City of San Diego brush management requirements that ensure appropriate buffering from the adjacent open space, providing an effective fire break between all structures and contiguous areas of native or naturalized vegetation. Fire-resistant plants and drought tolerant native vegetation will also be incorporated into the development. The project would be required to design, construct, and maintain structures, private drives, and facilities in compliance with applicable local, regional, state, and federal requirements related to fire safety, emergency access, and evacuation plans, as well as building materials, setbacks, water supply, hydrants, fire-flow, and defensible space requirements for development in fire hazard areas. Refer to EIR Sections 4.6 and 4.15 and EIR Appendix I for additional requirements related to fire safety. The project would be consistent with this policy.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-D.13	<p>Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.</p> <ul style="list-style-type: none"> a. Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires. b. Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles). c. Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code. d. Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible street signs and necessary water supply and flow for structural fire suppression. e. Coordinate with the Fire-Rescue Department to provide and maintain adequate fire breaks where feasible or identify other methods to slow the movement of a wildfire in very high fire hazard severity zones. 	Refer to the discussion under Policy PF-D.12.

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City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-D.14	Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.	Refer to the discussion under Policy PF-D.12.
Policy PF-D.15	Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.	The Wildfire Evacuation Plan (see Appendix J) noted that roadway capacities can accommodate project and community evacuation in addition to access by emergency responders. For the No Annexation Scenario and Annexation Scenario 2b, all project site access, including road widths and connectivity, would be consistent with the City of Chula Vista’s roadway standards and California Fire Code Section 503, which outlines the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. Similarly, in Annexation Scenario 2a, the project would be consistent with City of San Diego roadway standards and all applicable provisions of the Fire Code as adopted by the City of San Diego. Further, the project provides important road network improvements, including connection of existing dead-end road that would provide secondary fire access for the project and the neighboring community. These improvements would assist project access as well as provide a public benefit for existing residents by providing an additional route that may be utilized, at the discretion of the fire department/law enforcement, for responder ingress and/or resident egress (see Appendix J).

Table 2
City of San Diego General Plan Policy Consistency Analysis

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-D.16	Provide wildland fire preparedness education for fire safety advance planning.	The Fire Protection Plan and Evacuation Plan include recommendations for the Homeowners' Association to provide education and awareness to residents regarding wildfire risk and safety planning.
Policy PF-E.1	Provide a sufficient level of police services to all areas of the City by enforcing the law, investigating crimes, and working with the community to prevent crime.	The project site would be served by the San Diego Police Department and a new police substation.
Policy PF-E.2	Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows: <ul style="list-style-type: none"> • Priority E Calls (imminent threat to life) within seven minutes. • Priority 1 Calls (serious crimes in progress) within 12 minutes. • Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes. • Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes. • Priority 4 Calls (minor requests for police service) within 90 minutes. 	The project would result in additional residents and new housing that would require an increase in police services within Beat 725. Although the project would result in an increase in population of the service area, the majority of response times exceed response time goals. With respect to improving Priority 1 responses, a new police substation is included in the Otay Mesa Public Facilities Financing Plan (PFFP) Project Number PO-2, which is a 20,000-square-foot police substation. The project would be required to pay facility finance fees to fund its fair share of police services commensurate with project demand. Fees would be used to finance police facilities including the new police substation.
Policy PF-F.4	Maintain conveyance and treatment capacity.	Wastewater service to the project site would be provided via the City of San Diego's Otay Valley Trunk Sewer connection, which currently crosses the Otay River and extends onto the project site.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-F.5	Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies.	The EIR has assessed the impact of the project on existing facilities capacity and service times. Impacts of the development of new facilities require a separate environmental review and compliance with regulations to address potential environmental impacts related to the construction and operation of new facilities.
Policy PF-F.6	Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.	Refer to the analysis under Policy PF-F.4.
Policy PF-G.1	Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards.	<p>Under the NPDES permit program, the project would prepare a SWPPP prior to ground-disturbing activities identifying measures that would be employed during construction to avoid runoff into surface waters. Additionally, the project would incorporate construction BMPs in accordance with the City of San Diego Stormwater Standards Manual and would be required to comply with all of the City's stormwater standards, including SDMC Sections 43.0301 to 43.0312, which prohibits non-stormwater discharges, including spills, dumping, and disposal of materials other than stormwater to the Municipal Separate Storm Sewer System, and reduces pollutants in discharges from the Municipal Separate Storm Sewer System to receiving waters, to the maximum extent practicable, in a manner consistent with the Clean Water Act.</p> <p>As detailed in the project Storm Water Quality Management Plan (SWQMP) and Preliminary Hydromodification Plan, the project would include BMPs that would manage water quality by detaining polluted</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		storm water runoff prior to release. The proposed water quality BMPs would be maintained in perpetuity through the Homeowners' Association to ensure long-term operations would continue to provide water quality control. Project-specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures, consistent with General Plan policies and City design requirements, would be implemented to ensure project generated pollutants would not degrade local surface water and add to existing impairments.
Policy PF-G.2	Install infrastructure that, where feasible, includes components to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and our potable water supplies.	Refer to the analysis under Policy PF-G.1.
Policy PF-G.3	Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.	Refer to the analysis under Policy PF-G.1.
Policy PF-G.5	Identify and implement BMPs for projects that repair, replace, extend, or otherwise affect the stormwater conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.	Refer to the analysis under Policy PF-G.1.
Policy PF-H.2	Provide and maintain essential water storage, treatment, supply facilities and infrastructure to serve existing and future development.	The project proposes the construction of a parallel 12-inch-diameter public water line in Dennery Road from the existing water regulating station at Sand Star Way up to the project frontage/entrance driveway to support the project's water demands.
Policy PF-I.1	Provide efficient and effective waste collection services.	A project design feature (PDF-UTIL-1) has been included in the project description to require compliance with the

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		project's WMP in all scenarios, including program measures which requires (a) providing curbside recycling services to occupants, (b) requiring occupants to participate in a recycling program, (c) providing collection containers to occupants, (d) educating residents on recycling, and (e) prohibiting placing recyclable materials in a container not designated to receive those recyclable materials.
Policy PF-I.2	Maximize waste reduction and diversion (see also Conservation Element, Policy CE-A.8).	The project would implement a WMP for solid waste generated by the project. The project would comply with all state and local laws regarding solid waste and recycling with the preparation of a WMP. This plan provides 100 percent recycling of demolition waste and 75 percent diversion of construction waste. Additionally, the project would be required to adhere to City ordinances, including the Construction Debris Diversion Deposit Program, the City's Recycling Ordinance, and the Refuse and Recyclable Materials Storages Regulations. In addition, waste reduction, recycling, and management programs would be implemented as a part of California Green Building Standards Code. The project would be consistent with this policy.
Policy PF-I.5	Plan for sufficient waste handling and disposal capacity to meet existing and future needs. Evaluate existing waste disposal facilities for potential expansion of sites for new disposal facilities.	The SEIR assessed the remaining capacity of the landfills that would serve the facility in Chapter 4.14. The analysis also assessed diversion rates for the project and its potential impacts on these facilities.

**Table 2
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City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy PF-Q.1	<p>Protect public health and safety through the application of effective seismic, geologic, and structural considerations.</p> <ul style="list-style-type: none"> a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the CEQA document accompanying a discretionary action. c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected. g. Adhere to state laws pertaining to seismic and geologic hazards. 	<p>As discussed in Section 4.4, the project has the potential to expose people or structures to geologic hazards such as earthquakes, ground failure, or similar seismic hazards. Per the Geotechnical Investigations, no soils or geologic conditions were encountered that would preclude the development of the project site as proposed, with incorporation of the recommendations outlined in the Geotechnical Investigations (Appendices E-1 to E-5).</p> <p>The Geotechnical Investigation was prepared in accordance with the City's "Guidelines for Geotechnical Reports" and reviewed for adequacy by the Geology Section of the Development Services Department. The project would also be required to adequately demonstrate compliance with the California Building Code and applicable local geologic hazards regulations. The project would be consistent with this policy.</p>
Recreation Element (2021)		
Policy RE-A.10	<p>Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini-parks (see also Urban Design Policies, UD-B.8 and UD-C.5)</p> <ul style="list-style-type: none"> a. Consider private recreation facilities when evaluating development park needs when it is clearly identified that the facilities and programs provide a public benefit and are bound by easements and agreements that remain in effect 	<p>The project includes several pocket parks and trail connections to the OVRP (see Figure 3-6). Two park areas are sited along the northern boundary to increase access and views toward the OVRP. The central overlook pocket park at the northern boundary would provide a trail connection to the OVRP. The pocket park at the northwestern corner of the site would offer two playground areas. An approximate 0.04-acre monument entry pocket park would be provided near the project</p>

**Table 2
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City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<p>in perpetuity according to adopted policies (see also RE-C.6.).</p>	<p>entrance. These park spaces would offer a diverse range of recreational amenities.</p> <p>The project site is located adjacent to the OVRP which offers playing fields, picnic areas, biking, horse trails, and approximately 8.4 miles of multi-use trails connections to the greater open space network linking the project to nearby activity centers. In August 2021, the City of San Diego adopted a Parks Master Plan that has updated the parks standard from 2.8 acres per 1,000 residents to a value-based of 100 points per 1,000 residents. The 100 points reflect scoring based on recreation amenities, space for programmed activity, connectivity to transit, and other factors. The project under Annexation Scenario 2a shall comply with the adopted City of San Diego Parks Master Plan requirements. The project's several privately funded park improvements would be open to the public; however, they are not intended to satisfy the development's population-based park requirements. Specifically, the project intends to satisfy park impacts by paying the required Citywide Park Development Impact Fees.</p> <p>The project would be consistent with this policy.</p>

**Table 2
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Policy RE-C.6	<p>Provide safe and convenient linkages to and within park and recreation facilities and open space areas.</p> <ul style="list-style-type: none"> a. Provide pedestrian and bicycle paths between recreation facilities and residential development. b. Designate pedestrian and bicycle corridors, and where appropriate, equestrian corridors, that link residential neighborhoods with park and recreation facilities, trails, and open space. c. Improve public access through development of, and improvements to, multi-use trails within urban canyons and other open space areas. 	<p>The project would include several pocket parks and trail connections to the OVRP. Two park areas are sited along the northern boundary to increase access and views toward the OVRP. The central overlook pocket park at the northern boundary would provide a trail connection to the OVRP. The pocket park at the northwestern corner of the site would offer two playground areas.</p> <p>The project would provide paseos, which are enhanced pedestrian pathways providing residents additional green space incorporating large trees, shrubs, bench seating, and exercise stations.</p> <p>Neighborhoods within the project site would be linked via sidewalks, paseos, bicycle amenities, and a continuous street network that would accommodate a variety of living styles and mobility options. The proposed internal streets would have sidewalks and landscaped paseos that would provide connections to the proposed pocket parks, as well as trail access to the OVRP.</p>
Policy RE-D.6	<p>Establish a policy to address underutilized or unnecessary city rights-of-way.</p> <ul style="list-style-type: none"> a. Development and maintain an inventory of underutilized or unnecessary rights-of-way, including underlying ownership. b. Develop criteria to determine potential value of underutilized or unnecessary rights-of-way for bike, pedestrian, and equestrian linkages for trail access to open space canyons, and as overlooks into open space or beaches. 	<p>While this policy does not directly apply to the project site as it requires development of a policy to address underutilized or unnecessary City rights-of-way, the City has reviewed and considered the project's right-of-way to identify improvement requirements. The project primary access would be obtained from Dennery Road which contains City of San Diego right-of-way necessary to provide primary access to the project site. The City has evaluated the existing right-of-way and requires improvements to enhance the pedestrian experience through providing additional street trees and pedestrian</p>

**Table 2
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City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		amenities consistent with the City of San Diego Climate Action Plan Consistency Regulations (see Chapter 4.5). Trail signage and an OVRP kiosk would additionally be provided near the project entry and right-of-way (within public property), identifying public access to the OVRP trail system is available through the project site. The existing driveway would be replaced with full curb and gutter and a new 25-foot-wide driveway would be constructed approximately 40 feet southwest of the existing driveway.
Conservation Element (2008)		
Policy CE-A.5	Employ sustainable or “green” building techniques for the construction and operation of buildings.	The project would be consistent with 2022 Title 24 Green Building Standards. EIR Table 4.5-9 summarizes the project’s consistency with the 2008 and 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies which includes Green Building Standard measures. Through implementation the project would be consistent with this policy.
Policy CE-A.8	Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I-2, or by renovating or adding on to existing buildings, rather than constructing new buildings where feasible.	Solid waste generated by the project would be managed in accordance with the WMP (Appendix M), which would recycle 100 percent of demolition waste and would divert 75 percent of construction waste.
Policy CE-A.9	Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including: <ul style="list-style-type: none"> • Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; 	Refer to the analysis under Policy CE-A.8.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<ul style="list-style-type: none"> • Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system. 	
Policy CE-A.11	<p>Implement sustainable landscape design and maintenance, where feasible.</p> <ul style="list-style-type: none"> b. Encourage composting efforts through education, incentives, and other activities. c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities. d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. f. Reduce use of lawn types that require high levels of irrigation. h. Implement water conservation measures in site/building design and landscaping i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the need of development project to the maximum extent feasible. 	<p>The project would replace the natural vegetation associated with the vacant lot with drought-tolerant species. New trees would be planted on the project site in accordance with the landscape plans.</p> <p>The project would comply with City water conservation requirements including recycled water program, high efficiency irrigation, and implementation of the current plumbing code requiring low flow plumbing fixtures and highly water efficient appliances.</p> <p>The project design minimizes impervious surfaces consistent with the City regulations. The project would include two biofiltration basins and a modular wetland unit with a detention vault to manage water quality and provide peak flow detention to reduce stormwater runoff.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy CE-B.1	<p>Protect and conserve the landforms, canyon lands, and open spaces that: define the City’s urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.</p> <ul style="list-style-type: none"> a. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological areas of the City’s adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resources conservation 	<p>The project site is currently located within the City of Chula Vista Subarea plan; however, under the Annexation Scenarios, an amendment to the City of San Diego Subarea Plan would be required to amend the Subarea Plan boundary to include the project site. Upon annexation, the project site would be located within the MSCP Subregional Plan Biological Core Area 4 and Habitat Linkage M. However, as discussed in Section 4.3, while the project site likely provides some function for local wildlife movement due to its proximity to the Otay River but the site lacks regional value as a wildlife corridor due to its history of disturbance, the limited native habitat present, and its proximity to existing residential and commercial development, roads, and highways.</p> <p>The project would avoid development within the southern portion of the site which supports an on-site drainage which would be protected through dedication of a covenant of easement restricting future development within this area. The project has been designed to not require brush management within the drainage.</p> <p>Trail locations are shown on Figure 3-6. Trails would be constructed outside of sensitive habitat areas and would be consistent with OVRP trail guidelines.</p> <p>The project would be consistent with the relevant parts of this policy.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy CE-B.2	Apply the appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.	The project would be subject to the Environmentally Sensitive Lands (ESL) Regulations, which require that development avoid impacts to certain sensitive biological resources as much as possible. Consistent with City of San Diego Biology Guidelines (2018) and the ESL Regulations, impacts to potential jurisdictional resources within the project area would be avoided and minimized to the extent feasible. Impacts to wetlands would require a deviation from the ESL wetland regulations in accordance with SDMC Section 143.0150.
Policy CE-B.4	Limit and control runoff, sedimentation, and erosion both during and after construction activity.	Potential erosion and sedimentation impacts would be temporarily increased during project construction, through activities such as excavation, grading, and removal of surface stabilizing features (e.g., vegetation and pavement). Extensive or prolonged erosion can result in effects such as damaging or destabilizing slopes, soil loss, and deposition of eroded material in roadways or drainage structures. In addition, the off-site transport of sediment can potentially result in effects to downstream receiving water quality, such as increased turbidity and the provision of a transport mechanism for other contaminants that tend to adhere to sediment particles. However, with implementation of appropriate erosion and sediment control BMPs as part of an approved SWPPP and related City and NPDES requirements, erosion and sedimentation would be limited
Policy CE-B.6	Provide an appropriate defensible space between open space and urban areas through the management of brush, the use of transitional landscaping, and the design of structures (see also Urban Design Element,	The project incorporates fuel modification alongside roadways and generally within 100 feet of residences. A 6-foot-tall, one-hour fire rated wall is proposed along the rear of lots along the north and eastern boundaries of

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	Policy UD-A.3.o). Continue to implement a citywide brush management system.	the project. Additionally, several heat-deflecting masonry walls would be installed on-site between structures and open space. The habitable structures would be fire-rated with enhanced fire protection features such as dual glazed/dual tempered panes and other features detailed in the fuel modification plan.
Policy CE-E.2	<p>Apply water quality protection measures to land development projects early in the process-during project design, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.</p> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to drainage into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. 	<p>The project integrates water quality protection measures into its design as well as into the construction and operation phases. The project prepared a project level Priority Development Permit (PDP) SWQMP with a preliminary list of BMPs that include site design BMPs, including maintenance of natural drainage pathways; conserving natural areas; minimization of impervious surfaces; minimization of soil compaction; dispersion of impervious areas; and landscaping with drought tolerant species. It also includes the following source control BMPs: installing storm drain stenciling or signage; protecting trash storage areas, installing on-site storm drain inlets, designing landscaping to reduce impervious surfaces and minimize the use of chemicals, and designating refuge areas. The project includes two biofiltration basins and a modular wetland unit with a detention vault would be constructed on-site to manage water quality and provide peak flow detention. Slopes and areas susceptible to erosion have been avoided in the design process, or would be revegetated after disturbance. As detailed in Chapter 4.12, the project would be consistent with local regulations protecting the topography, drainage systems, and water bodies including the General Plan, OMCP, Municipal Code,</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<ul style="list-style-type: none"> f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. g. Apply land use, site development and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements development permit conditions. 	<p>Drainage Design Manual, and Stormwater Standards Manual.</p> <p>The project would not result in any adverse effect on MHPA lands as none are present on-site or in the surrounding area.</p>
Policy CE-E.3	<p>Require contractors to comply with accepted storm water pollution prevention planning practices for all projects.</p> <ul style="list-style-type: none"> a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction. 	<p>The SWPPP is a requirement of the NPDES permit and CGP and would regulate construction BMPs. The project prepared a project-level PDP SWQMP identifying a preliminary list of BMPs, which would be implemented as project design features, to minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. The project's temporary construction BMPs would be installed for the duration of project construction.</p>
Policy CE-F.4	<p>Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.</p>	<p>The project would provide trees along the back of sidewalk and between the existing trees to absorb carbon dioxide and pollutants. The project would preserve remaining open space and natural habitat and focus development within areas with available public infrastructure.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy CE-F.5	Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.	This policy is not applicable, as the project would not promote technological innovations to help reduce vehicular or motorized equipment emissions. However, the project would integrate all standard measures during design, construction, and operations to reduce emissions to the furthest extent possible.
Policy CE-F.6	Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.	The project includes mitigation measures GHG-CV-1/GHG-SD-1, GHG-CV-2/GHG-SD-2, and GHG-CV-3/GHG-SD-3, which would require subsidized transit passes, implementation of a commuter trip reduction program, and providing bicycles to residents, respectively.
Policy CE-G.1	Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable and manage all City-owned native habitats to ensure their long-term biological viability.	The project would avoid development within the southern portion of the site which supports an on-site sensitive habitat. The area would be protected through dedication of a covenant of easement restricting future development within this area. The project has been designed to not require brush management within the drainage.
Policy CE-G.3	Implement the conservation goals/policies of the City's MSCP Subarea Plan, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.	The project, under all scenarios, would be required to comply with all conditions of coverage of MSCP covered species; however, the project site lacks connectivity to suitable habitat in the vicinity. An existing trail connection running along the western side of the project site would be retained as a 7-to-8-foot-wide trail enhanced with decomposed granite surfacing to provide connection to the OVRP trail system. This existing trail would be separated from the development area by a small retaining wall and a composite split rail fence.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy CE-G.5	Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.	A 6-foot block wall would be installed along the outer edge of the buffer to restrict access to the adjacent wetlands and streambed. In addition, the project prepared a project-level PDP SWQMP identifying a preliminary list of BMPs, which would be implemented as project design features, to minimize disturbance, protect slopes, reduce erosion, and reduce drainage pattern changes. No modifications to the adjacent river would be proposed.
Policy CE-H.4	Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions and values.	The proposed wetland buffer in addition to wetland buffer design features would ensure long-term protection of the function and values of the wetland after the project is fully operational.
Policy CE-H.7	Encourage site planning that maximizes the potential biological, historic, hydrological and land use benefits of wetlands.	Wetland buffers offer water quality benefits by filtering pollution and improving the function of wetland resources. The project design incorporates a wetland buffer that ranges between 18 feet and 99 feet from the drainage course to protect and maintain the functions and values of the on-site wetland. The buffer would be located between the proposed development and the wetland to avoid and minimize any indirect edge effects. Furthermore, the proposed landscaping would improve the quality of the buffer compared to existing conditions by removing invasive species and establishing native upland species and a 6-foot block wall running along the eastern boundary of the project site to further protect functions and values of the wetlands on-site. The biofiltration basin would also protect the wetlands from runoff from the adjacent development. Water quality improvements implemented by the project would

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		improve run-off in a manner that would also reduce erosion and siltation issues into the Otay River off-site.
Policy CE-H.8	Implement a “no net loss” approach to wetlands conservation in accordance with all city, state, and federal regulations.	The project applicant shall provide compensatory wetland mitigation resulting in no overall net loss of wetlands.
Policy CE-H.9	Consider public health, access, and safety, including pest and vector control, on wetland creation and enhancement sites.	A 6-foot block wall would be installed along the outer edge of the buffer to restrict access to the adjacent wetlands and streambed. In addition, signage shall be posted that informs people of the sensitive nature of the adjacent wetland habitat and prohibits any brush management activities.
Policy CE-I.4	Maintain and promote water conservation and waste diversion programs to conserve energy.	<p>The project would promote water conservation through its use of native, drought tolerant plants, consistent with the City of San Diego Landscape Manual, which would reduce the quantity of water use for landscaping. In addition, the residences would be in compliance with the 2022 Building Code requirements related to appliance efficiency.</p> <p>With implementation of the organic material recycling collection and an assumption of 75 percent individual compliance, the project would achieve adequate organic waste diversion to support Statewide compliance with Senate Bill 1383 which requires diversion of 50 percent of organic waste prior to January 1, 2025, and 75 percent diversion thereafter.</p>
Policy CE-I.5	<p>Support the installation of photovoltaic panels, and other forms of renewable energy production.</p> <p>Promote the use and installation of renewable energy alternatives in new and existing development.</p>	The project would not be consistent with this policy, as no solar/photovoltaic panels would be installed as part of the project. However, once operational, the project would be served by San Diego Gas & Electric, which includes 30 percent renewable energy sources within its portfolio.

<p style="text-align: center;">Table 2 City of San Diego General Plan Policy Consistency Analysis</p>		
City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy CE-I.10	Use renewable energy sources to generate energy to the extent feasible.	See analysis under Policy CE-I.5.
Noise Element (2015)		
Policy NE-A.1	Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.	Residences would be collocated next to noise generating stationary equipment, roadways, and parks as part of the project. However, property line noise levels due to on-site noise sources are not predicted to exceed the most restrictive noise level limits.
Policy NE-A.2	Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.	The project assessed existing primary noise sources at the site, which consisted of traffic along adjacent roadways, the sounds of leaves rustling, audible distant aircrafts, and birdsong. On-site noise barriers would be installed to minimize noise on noise-sensitive receptors.
Policy NE-A.3	Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.	See analysis under NE-A.1 and NE-A.2.
Policy NE-A.4	Require an acoustical study consistent with acoustical study guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the land use-noise compatibility guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	An exterior-to-interior noise analysis for the proposed dwelling units expected to be exposed to noise levels in excess of 60 community noise equivalent level (e.g., units facing I-805) would be completed prior to issuance of building permits to mitigate for noise impacts as needed. The acoustical analysis shall substantiate that the resulting interior background noise levels, with appropriate implementation of interior comfort systems and sound insulation, would be less than this noise standard. This would be included in the project as a project design feature.
Policy NE-A.5	Prepare noise studies that address existing and future noise levels from noise sources that are specific to a community when updating community plans.	A Noise Technical Report was prepared for the project that addresses existing and future noise levels from noise sources (see EIR Appendix L).

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy NE-B.1	Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.	See analysis under NE-A.1, NE-A.2, and NE-A.4.
Policy NE-B.3	Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.	See analysis under NE-A.1, NE-A.2, and NE-A.4.
Policy NE-B.4	Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling, and, where applicable, transit to reduce peak-hour traffic.	See analysis under Policy 3.1-1, 3.3-1, 3.3-2.
Policy NE-B.7	Promote the use of berms, landscaping, setbacks, and architectural design where appropriate and effective, rather than conventional wall barriers to enhance aesthetics.	Barriers can be constructed of masonry, wood, plastic, plexi-glass, fiberglass, steel, or a combination of those materials. However, the project would incorporate landscaping, architectural design, and setbacks per design regulations, which would aid in sound attenuation.
Policy NE-B.9	When parks are located in noisier areas, seek to reduce exposure through site planning, including locating the most noise sensitive uses, such as children's play areas and picnic tables, in the quieter areas of the site; and in accordance with the other policies of this section.	Pocket parks may include play structures or tot-lots that would generate noise from children at play. The tot-lots would be in quiet residential areas within the project site.
Policy NE-I.1	Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.	See analysis under NE-A.4.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
Policy NE-I.2	Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate	See analysis under NE-A.4.
Historic Preservation Element (2008)		
HP-A.1	<p>Strengthen historic preservation planning.</p> <ul style="list-style-type: none"> a. Participate in regional efforts to strengthen historic preservation planning. 	As part of the City's efforts to strengthen regional historic preservation planning, the project has assessed the site conditions for the built environment and archaeological resources. The evaluation of these resources considered potential mitigation in the event of discovery, including curation.
HP-A.3	<p>Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.</p> <ul style="list-style-type: none"> a. Regularly meet with local Tribal governments to discuss issues of mutual concern. b. Formally consult with identified California Native American tribes prior to the adoption or amendment of the General Plan or specific plan or the designation of open space. c. Maintain confidentiality concerning locations of traditional cultural places that are identified through the consultation process and otherwise. d. Support Tribal governments holding conservation easements over land voluntarily set aside for the protection of cultural places. 	As part of this project entitlement process, the City has mailed outreach letters all Native American tribes provided by the Native American Heritage Commission's contact list. The letters requested to define a general area where known resources cross the project area. The Viejas Band of Kumeyaay Indians, the Campo Band of Kumeyaay Indians, the Jamul Indian Village, and the San Pasqual Band of Diegueño Mission Indians requested consultation. As part of the City's regulations, confidentiality would be maintained in the event of the discovery of resources. No known conservation easements over land voluntarily set aside for the protection of cultural places exists on-site.

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
HP-A.4	<p>Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.</p> <ul style="list-style-type: none"> a. Develop context statements specific to areas being surveyed. b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. Include community, neighborhood, cultural, and historic preservation groups, property owners, land developers, and the building industry in planning and implementing historic surveys. c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information. d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions. e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, evaluation, data recovery, and construction monitoring. 	<p>The project includes mitigation measure HIST-SD-1: Archaeological and Native American Monitoring, which supports the City's efforts in consistently implementing the City's program to identify, document and evaluate the historical and cultural resources.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<p>f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.</p>	
HP-A.5	<p>Designate and preserve significant historical and cultural resources for current and future generations.</p> <p>a. Due to their importance, designate historical resources using the City's adopted designation criteria, State Register criteria, and National Register criteria.</p> <p>b. Establish historical districts where concentrations of buildings, structures, sites, landscapes, and objects are identified. Adopt guidelines when necessary to guide preservation and rehabilitation of the overall district character and significance and apply the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties for review of alterations and new construction in designated historical districts.</p> <p>c. Protect and preserve historic sidewalk stamps, street signs, lampposts, street trees, and other hardscape and cultural landscape elements, in addition to designated historical buildings, structures, and sites that contribute to the historic character of a neighborhood.</p>	<p>As part of the City's effort in applying the Historical Resources Regulations, the project has assessed potential designated historical resources on site, conducted surveys to assess potential undesignated resources on site, and established mitigation to designate and preserve potential significant historical and cultural resources on site.</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
	<ul style="list-style-type: none"> d. Enforce the Historical Resources Regulations and Guidelines of the Land Development Code that are aimed at identifying and preserving historical resources. Update these regulations and guidelines as needed to maintain adequate protection of historical resources. e. Encourage continued use and adaptive reuse of designated historical resources through application of the I.S. Secretary of the Interior’s Standards and Guidelines for rehabilitation, reconstruction, and restoration. f. Require that all City-owned designated historical resources be maintained in a manner that is consistent with the US. Secretary of the Interior’s Standards for the Treatment of Historic Properties. 	
Housing Element (2021)		
Policy HE-O.1	Promote economically viable, environmentally sound, and socially equitable land use plans and development patterns that conserve nonrenewable energy sources.	<p>The project proposes a compact development pattern that would provide financial benefit to the community, provide housing options pursuant to local housing needs, and that takes into consideration its impact on sensitive habitats and drainages all while building a community within proximity to major urban centers.</p> <p>Overall, the project would incorporate energy efficient design measures and construction features to meet the State of California and local standards, under all project scenarios. The project integrates connections from residential land uses to bus connections, internal recreational uses, and roadways. The project would also</p>

**Table 2
City of San Diego General Plan Policy Consistency Analysis**

City of San Diego General Plan Goal/Policy	Goal/Recommendation	Project Consistency Discussion
		practice energy conservation through the use of shade trees that reduce heat island issues.
Policy HE-O.2	Encourage new housing that relies on and supports transit use and environmentally sustainable patterns of movement.	See analysis for Policy HE-O.1. The project includes access to trails, internal recreational areas, and pedestrian and bicycle lanes throughout the development.
Policy HE-O.4	Improve infrastructure systems throughout the City to support infill development and promote new affordable housing near transit stations, major transit stops, and along transit corridors.	The project would expand City of San Diego water distribution systems and facilities and wastewater infrastructure from existing facilities to the project to support the project. New roadways and bicycle/pedestrian facilities would provide new connections to existing transit from existing public streets, promoting housing development near transit.
Policy HE-O.7	Improve the City's resiliency to climate change, especially wildfires, drought, and sea level rise.	The project supports resiliency against climate change impacts through its design features. The project includes a detailed landscaping plan that encourages the planting of native, drought-tolerant species which would support water conservation, fire resistance, and erosion control. In addition, the project incorporates fuel modification alongside roadways and generally within 100 feet of residences. Where 100 feet of brush management cannot be accommodated, alternative compliance measures are incorporated to provide enhanced fire protection against wildfires. The project is not located near the sea; therefore, measures against sea level rise were not incorporated.

¹ Office of Environmental Health Hazard Assessment, Guidance Manual for Preparation of Health Risk Assessments. Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines. February 2015. http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf.

² City of San Diego, Systemic Safety - The Data-Driven Path to Vision Zero, April 2019. <https://www.sandiego.gov/sites/default/files/systemic-safety-the-data-driven-path-to-vision-zero.pdf>.

**Table 3
Otay Mesa Community Plan Policy Consistency Analysis**

City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
Land Use Element		
<p>Policy 2.1-2</p> <p>Policy 2.1-2 (a) and (e)</p>	<p>Achieve sustainable and efficient land use patterns with comprehensive neighborhood and community village development through Specific Plans that: (see below for subsections)</p> <p>(a) Respect the natural topography and sensitive habitat areas with growth patterns that balance development with preservation of natural resources.</p> <p>(e) Illustrate a separate system of pedestrian and bicycle facilities and pathways linking the activity centers with residential areas, public facilities, and open space systems.</p>	<p>The project largely avoids steep slopes and topography located at the southern end of the site. Additionally, impacts to sensitive habitats would be minimized to the maximum extent. The residential development is located in the center of the property, on slopes that are conducive to development while the steep slopes along the edges of the property have generally been left in a natural state. The project provides buffers to adjacent open space and residential developments that create protective measures to ensure there are no adverse effects on the adjacent sensitive habitat in the ORVP. The project design has addressed stormwater management, transitional vegetation for protection of nearby habitat areas, as well as biofiltration basins for groundwater infiltration. The project would be consistent with section (a) of this policy.</p> <p>The project includes paseos enhanced with pedestrian and bicycle pathways that would be linked to all internal neighborhoods, as illustrated on EIR Figure 3-7. The project would be consistent with section (e) of this policy.</p>
<p>Policy 2.1-2(f)(2)</p>	<p>Locate neighborhood parks at the end of streets and adjacent to canyons when appropriate to accommodate and enhance public views and vistas.</p>	<p>As shown in EIR Figures 3-6 and 3-7, pocket parks are distributed throughout the project area, with the overlook pocket park located at the north end of the central road, offering views of the OVRP. The project would be consistent with this policy.</p>

**Table 3
Otay Mesa Community Plan Policy Consistency Analysis**

City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
Policy 2.1-2(g)(2)	<p>Identify specific locations for schools, parks, pedestrian pathways and trails.</p> <p>Include pathways and trails that connect public facilities with each other and to residential areas.</p>	<p>The project includes paseos enhanced with pedestrian and bicycle pathways that would be linked to all internal neighborhoods, as illustrated on Figure 3-7. On-site and off-site trail improvements are proposed as detailed in the project description. Refer to section 3.4.3.1, 3.4.4.2, and Section 3.4.5 for details of the project's pedestrian connections. The project does not include a school component.</p>
Policy 2.1-2(r)	<p>Include guidelines and illustrations for height, bulk, and scale of buildings and their relation to each other.</p>	<p>The uncodified ordinance would include measures to ensure the height, bulk, and scale of the project will maintain the integrity of the surrounding residential neighborhoods. The broader Ocean View Hills community surrounding the project site contains residential development of similar size, scale, and architectural styles. The project includes minimum setbacks and buffers from neighboring uses to ensure compatible land uses and edge transitions. The project would be consistent with this policy.</p>
Policy 2.2-1	<p>Respect existing density ranges in previously approved Precise Plan areas of the Northwest District.</p> <ul style="list-style-type: none"> a. Include existing density ranges of precise plans to allow any undeveloped neighborhood areas to develop in accordance with precise plan designations. b. Implement design guidelines of precise plans that are consistent with the goals and policies of the City's General Plan. c. Transition new development with greater intensity from existing development through the use of 	<p>While the project is not part of a previously approved Precise Plan, it is a planned residential development on undeveloped land within the Northwest District.</p> <p>The project includes single-family units, townhomes, and duplex twin homes, which all are provided at varying price points to accommodate a range of income groups that is consistent with the City of San Diego General Plan.</p> <p>The project is designed to be an attractive development that compliments surrounding developments and provides visual interest for residents and visitors. The</p>

**Table 3
Otay Mesa Community Plan Policy Consistency Analysis**

City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
	<p>landscaping, fencing, setbacks, offsetting planes and other urban design techniques.</p> <p>d. Develop remaining undeveloped neighborhoods with a variety of housing types, and target the upper limits of the density ranges.</p>	<p>uncodified ordinance shall inform future development and design elements such as structure architecture, recreation and open space landscaping, site design, and streetscape design.</p> <p>The project implements policies, standards, and procedures to maintain the integrity of the surrounding residential neighborhoods. The broader Ocean Views Hills community contains residential development of similar size, scale, and architectural styles. The project includes minimum setbacks and buffers from neighboring uses to ensure compatible land uses and edge transitions. The uncodified ordinance shall ensure new development recognizes and enhances the interface of the community by contributing additional recreational amenities and housing units that mesh with its surrounding community.</p>
Policy 2.2-2	Integrate a variety of housing types within village and residentially designated areas with multimodal access from the villages to the employment centers in the eastern portion of Otay Mesa.	The project includes single-family units, townhomes, and duplex twin homes that have access to roadways with sidewalks, bike paths, and trail connections. This mobility network provides connections between the residential neighborhoods of the project and the commercial, retail, and transit facilities. The multi-modal routes provide the residents with access to the surrounding community including the four bus stops within a half-mile of the project.
Policy 2.2-3	Include in all residential developments housing units that are sized to meet the household family sizes anticipated in Otay Mesa.	The project includes the single-family units, townhomes, and duplex twin homes which all are provided at varying price points to accommodate a range of income groups

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City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
		that is consistent with the Community Plan. The number of bedrooms per dwelling unit ranges from two bedrooms to five bedrooms, which can accommodate the anticipated household size of 3.64.
Policy 2.2-5	Develop housing at different density ranges to provide housing affordable to all income levels.	The project provides housing options at varying sizes and price points which may be attainable for citizens at various economic levels, diversifying the workforce and in turn the economic base of the region. Ten percent (10%) of the total units within the project would be affordable to low- and moderate-income households. Of the ten percent, five percent (5%) must be affordable to low-income households and five percent (5%) must be affordable to moderate income households.
Policy 2.2-6	Promote affordable housing development through the provision of a variety of housing types, including flats, townhomes, smaller-lot single-family homes, and other types of housing that are affordable in nature.	The project includes single-family units, townhomes, and duplex twin homes which all are provided at varying price points to accommodate a range of income groups that is consistent with the Community Plan. See Policy 2.2-5
Policy 2.2-7	<p>Promote the production of very-low and low-income affordable housing in all residential and village designations.</p> <ul style="list-style-type: none"> a. Support development of on-site inclusionary housing within all specific plan proposals. b. Encourage on-site inclusionary housing within all residential development proposals. 	The project provides housing options at varying sizes and price points which may be attainable for citizens at various economic levels, diversifying the workforce and in turn the economic base of the region. See Policy 2.2-5.
Policy 2.2-8	Create affordable home ownership opportunities for moderate income buyers.	The project provides housing options at varying sizes and price points which may be attainable for citizens at

<p style="text-align: center;">Table 3 Otay Mesa Community Plan Policy Consistency Analysis</p>		
City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
	<ul style="list-style-type: none"> a. Encourage development of moderately priced, market rate housing affordable to middle income households. b. Promote homebuyer assistance programs for moderate income households. 	various economic levels, diversifying the workforce and in turn the economic base of the region. See Policy 2.2-5.
Mobility Element		
Policy 3.1-1	<p>Provide a sidewalk and trail system with connections to villages, activity centers, and open spaces.</p> <ul style="list-style-type: none"> a. Prioritize connections that link activity centers and create safe routes to schools, transit, and village areas. c. Create the pedestrian realm in accordance with the standards and guidelines of the Street Design Manual. d. Improve the quality of the walking experience through streetscape, shading, and separation from travel lanes. 	Neighborhoods within the project site would be linked via sidewalks, paseos, bicycle amenities, and a continuous street network that would accommodate a variety of living styles and mobility options. The proposed internal streets would have sidewalks and landscaped paseos that would provide connections to the proposed pocket parks, as well as trail access to the OVRP. Internal mobility and pedestrian access to Dennery Road would ensure accessible pedestrian access to bus stops located along Palm Avenue and Dennery Road, with street trees provided for shade. Along private streets, buffered bike lanes would provide pedestrians separation from travel lanes.
Policy 3.3-1	Provide an interconnected network of public streets and internal project circulation systems as an organizing framework for development.	Internal circulation would consist of a series of private streets connected to public streets (Dennery Road, Palm Avenue, etc.).
Policy 3.3-2	Avoid street design configurations that rely on free-flow turn lanes that conflict with bicycle and pedestrian movements.	As part of the City of San Diego’s Systemic Safety - The Data-Driven Path to Vision Zero, to increase the visibility of traffic signals and reduce vehicles from proceeding through red lights, upgraded signal heads with backplates with retroreflective borders would be installed by the project at all intersection approaches. Countdown pedestrian heads would be installed by the

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		owner/permittee for each pedestrian phase. Additionally, bicycle improvements (bicycle loop detectors) are proposed along Dennery Road at Red Fin Lane to reduce vehicle-bicyclist conflicts at intersections.
Policy 3.4-1	<p>Refine and implement the BMP in the Otay Mesa Community Plan area.</p> <ul style="list-style-type: none"> a. Develop bicycle facilities that implement internal connectivity to activity areas within the community and links to regional bicycle network. d. Provide Class II bikeways along all new classified streets in Otay Mesa. 	<p>The buffered Class II bike lanes would link to the existing Class II bike lane along Dennery Road and to all internal neighborhoods of the project. As shown in the City of San Diego Bicycle Master Plan Figure 6-2, the Master Plan identifies Class II bike lanes along Dennery Road from Del Sol Boulevard and across Palm Avenue to connect to the regional network.</p> <p>The project would provide buffered Class II bike lanes along Private Street A, the main private street running through the site. The buffered Class II bike lanes would separate bicycles from automobile traffic and link to the existing Class II bike lane along Dennery Road. The private streets leading east and west from the primary roadway would include bicycle sharrows, which are painted markings on the road surface to indicate to drivers that the road must be shared with bicycles. Bicycle racks would be located at pocket parks.</p>
Public Facilities, Services, and Safety Element		
Policy 4.3-1	<p>Employ sensitive design techniques when developing adjacent to Otay Mesa’s natural canyon and open space systems.</p> <ul style="list-style-type: none"> a. Relate development to the topography and natural features when grading to retain the character of the landform. 	<p>Undeveloped portions of the site including sloped areas in the southern portion of the site and portions of an on-site drainage running along the eastern edge of the project site would be protected through dedication of a covenant of easement restricting future development within these areas. Along the wetland drainage area, placement of signage would denote the presence of an</p>

**Table 3
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City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
	<ul style="list-style-type: none"> b. Implement contour grading and bank undulation to avoid extreme slope faces. c. Maintain first floor setbacks and step-back additional stories along the public right-of way to enhance scenic opportunities. 	<p>environmentally sensitive area. The uncodified ordinance would ensure development complies with regulations, including setbacks, in a way that would enhance scenic opportunities for views to the Otay River.</p>
Policy 4.3-2	<p>Provide public space, parks, and scenic overlooks at the end of streets and adjacent to open space areas to take full advantage of scenic opportunities.</p> <ul style="list-style-type: none"> a. Provide for public view opportunities when streets end due to open space areas or abrupt changes in topography. b. Avoid locating housing and other structures at the end of streets. 	<p>The project would provide views from the project site toward the Otay River from publicly accessible parks on site and from a public trail connection. Brief views of the Otay River Valley are available from the portion of Dennery Road that passes by the site. The internal circulation within the project would consist of connected private streets that would connect to Dennery Road, along which housing is located.</p>
Policy 4.3-5	<p>Use visual details such as architectural style, color and material schemes, and façade treatments to convey neighborhood identity.</p>	<p>The uncodified ordinance would ensure structures would be developed with visually appealing architectural elements and the landscaping plans include guidelines for the use of material themes and colors to guide the character of the neighborhood.</p>
Policy 4.3-7	<p>Create visual and physical linkages within villages, neighborhoods, and project site areas through a unified landscape theme.</p>	<p>The landscape plans provide a plant palette, materials, and color themes that would guide the visual appearance of the landscaping of paseos, signage, and neighborhoods throughout the project.</p>
Policy 4.3-7b	<p>Utilize sustainable landscape practices, including water conservation and storm water management.</p>	<p>The project has prepared a detailed landscape plan to guide the appearance and functionality of landscaping within the project site, which includes street streets and drought tolerant species for water conservation and erosion control. Undeveloped portions of the site including sloped areas in the southern portion of the site</p>

**Table 3
Otay Mesa Community Plan Policy Consistency Analysis**

City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
		and portions of an on-site drainage running along the eastern edge of the project site would be protected through dedication of a covenant of easement restricting future development within these areas.
Policy 4.9-2d	Ensure that all best management practices for storm water are implemented for both public and private properties.	Consistent with the BMP Design Manual, all PDP projects are required to include structural BMPs for permanent storm water pollution control. The project integrates BMPs for storm water along both private streets as well as public, e.g., Dennery Road street trees, which continue onto the proposed private streets.
Policy 4.9-5	<p>Integrate storm water Low Impact Development principles as discussed in Section 8.4 and Best Management Practices (BMP's) early in the design process of new development, as well as any redevelopment proposals.</p> <ul style="list-style-type: none"> a. Encourage the use of green roofs and water collection devices to capture rainwater from the building for re-use. b. Encourage the use of trees with project proposals to slow storm water runoff to help reduce peak flow. c. Minimize on-site impermeable surfaces, such as concrete and asphalt. d. Encourage the use of permeable pavers, porous asphalt, reinforced grass pavement (turf-crete), cobblestone block pavement, etc., to detain and infiltrate run-off on-site. 	The project includes pocket parks, landscaped paseos, biofiltration basins, and transitional vegetation, and street trees. Project-specific site design, source control, and treatment control BMPs, Low Impact Development practices, and project design measures, consistent with General Plan policies and City design requirements, would be implemented to ensure project generated pollutants would not degrade local surface water and add to existing impairments, as detailed in the analysis under Policy 8.4-1.

**Table 3
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City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
Policy 6.1-1	<p>Maintain fire and police service levels to meet the demands of continued growth and development in Otay Mesa.</p> <ul style="list-style-type: none"> a. Monitor how development affects average fire and police response time goals and facilities' needs. b. Continue to coordinate with the Police and Fire-Rescue Departments to collocate the third fire station with the police facilities in Otay Mesa. 	<p>The project assesses in EIR Chapter 4.13 the impact of the project on existing fire and police response times. The project noted that the City of San Diego's adopted PFFP (City of San Diego 2015)¹ for the City of San Diego Otay Mesa Community Plan identifies a new fire station, Fire Station Number 49, to be built in Otay Mesa. In addition, the City of San Diego's PFFP for Otay Mesa identifies a new police substation planned as Project Number PO-2. The project would coordinate with these departments in regard to needs, access, and infrastructure required to serve this community.</p>
Policy 6.1-2	<p>Locate, staff, and equip the Otay Mesa fire stations to meet established response times.</p> <ul style="list-style-type: none"> a. Provide a minimum 10,500-square-foot Fire Station #49. 	<p>The project noted that the City of San Diego's adopted PFFP (City of San Diego 2015) for the City of San Diego Otay Mesa Community Plan identifies a new fire station, Fire Station Number 49, to be built in Otay Mesa. This new station, identified in Project Number F-2 of the Otay Mesa PFFP, would relocate existing Fire Station Number 6 to a site on the south side of Ocean View Hills Parkway, just east of the intersection of Playa del Sol Parkway. This new station, together with its rolling stock, equipment, and furnishings, is to be fully funded by the Otay Mesa Facilities Benefit Assessments/Development Impact Fees, which is imposed on all new development in the City of San Diego in the Otay Mesa Community Plan. As part of this project, fees would be paid to the City of Chula Vista as part of the building plan process; however, a fee sharing agreement between the City of San Diego and the City of Chula Vista would be needed to allocate fees to the serving agency.</p>

**Table 3
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City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
Policy 6.2-2	Provide operational park facilities when new residential development occurs.	The project includes on-site parks including two pocket parks and a monument entry pocket park. Trail improvements including trail signage and an OVRP trail kiosk are proposed. Recreational areas would be landscaped with seating, walkways, and other amenities. In addition to parks, the project would provide paseos, which are enhanced pedestrian pathways providing residents additional green space incorporating large trees, shrubs, bench seating, and exercise stations. Refer to EIR Chapter 3.0, Project Description, Section 3.4.4, for details on proposed recreational amenities.
Policy 6.2-3	<p>Coordinate planning efforts with the San Ysidro Unified School District and the Sweetwater Union High School District.</p> <p>a. Ensure that adequate public facilities and infrastructure are in place, and compliance with maximum school enrollments are achieved, consistent with demand.</p>	The Chula Vista Elementary School District, the San Diego Unified High School District, and the San Ysidro School District were contacted as part of the project entitlement process to determine availability of these districts to serve the project site. As noted by the responses from these districts, the project would be accommodated by existing area school facilities and would contribute school district fees to off-set the project's demand for school facilities.
Policy 6.6-4	Provide a library within the community planning area that meets community needs, and that would adapt to technological changes, enhance library services, and expand access to digital information and the internet.	Regardless of the facility funding arrangement, the project does not include the construction of any library facilities. In the case of library services, the City of San Diego would provide the closest library facilities to the project site (Otay Mesa-Nestor branch). The Otay Mesa PFFP has identified a new library project, Project No. L-2, which calls for a new branch library for Otay Mesa. This project will be funded entirely by facility financing fees collected from new residential development. Therefore,

<p style="text-align: center;">Table 3 Otay Mesa Community Plan Policy Consistency Analysis</p>		
City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
		the project would contribute its fair share of the cost of library improvements.
Policy 8.4-1	<p>Manage storm water using Low Impact Development principles for development proposals, and include the most current restrictions/allowances for sustainable development and environmental maintenance.</p> <ol style="list-style-type: none"> a. Consider topography, soils and other site features that are essential when planning for Low Impact Development design. b. Incorporate sufficient land areas to locate storm water management facilities early in the development planning process. c. Include Low Impact Development practices such as bioretention, porous paving, and green roofs, early in the development process to find compatibilities with other goals, such as incorporating landscaped bio-retention features that could also enhance walkability. 	<p>A SWQMP was prepared for the project providing a preliminary list of BMPs as project design features to be employed during temporary construction activities. Additionally, new development would be required to implement permanent storm drain BMPs designed consistent with the City of Chula Vista’s BMP Design Manual. Pursuant to the project’s SWQMP, the project would include the following:</p> <ul style="list-style-type: none"> • Site Design BMPs: maintenance of natural drainage pathways; conserved natural areas; minimization of impervious surfaces; minimized soil compaction; impervious area dispersion; landscaping with drought tolerant species. • Source control BMPs: storm drain stenciling or signage; protected trash storage areas, on-site storm drain inlets, landscaping, designated refuge areas, fire sprinkler test water; and drain or wash water.
Conservation Element		
Policy 8.1-1	Implement the Environmentally Sensitive Lands Regulations related to biological resources and steep hillsides for all new development.	The project would be subject to the ESL Regulations, which require that development avoid impacts to certain sensitive biological resources as much as possible including but not limited to MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and state listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. In the No Annexation Scenario and Scenario 2b, the City of San Diego would require a

**Table 3
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City of San Diego Goal/Policy Reference	Goal/ Policy Text	Project Consistency Discussion
		Site Development Permit for the off-site improvement areas due to the presence of ESL on land within the City of San Diego. In Annexation Scenario 2a, the City of San Diego would require compliance with the Environmentally Sensitive Lands Regulations through an uncodified ordinance for all portions of the site currently within the City of Chula Vista.
Policy 8.1-3	Plan development to minimize grading and relate to the topography and natural features of Otay Mesa.	The project considers the natural topography and drainage patterns of the site as it relates to grading to avoid impacts to the adjacent wetlands and Otay River.
Policy 8.5-1	Ensure the overall tree cover and other vegetation throughout Otay Mesa is no less than 20 percent in urban residential areas and 10 percent in the business areas so that the natural landscape is sufficient in mass to provide significant benefits to the city in terms of air and water management.	The project would provide close to 49 percent of landscaped areas, which include tree cover and other native vegetation.
Policy 8.7-8	Encourage street tree and private tree planting programs throughout the community to increase absorption of carbon dioxide and pollutants.	The project would provide street trees and landscaping throughout the site.
¹ City of San Diego, Otay Mesa Public Facilities Financing Plan and Facilities Benefit Assessment, Fiscal Year 2014. Adopted 2014, amended July 16, 2015.		