



THE CITY OF SAN DIEGO

ADDENDUM TO AN ENVIRONMENTAL IMPACT REPORT

Project No. PRJ-1110197
Addendum to EIR No. 30330/304032
SCH No. 2004651076

SUBJECT: **Vista Santo Domingo Rezone and CPA:** A GENERAL PLAN AMENDMENT and COMMUNITY PLAN AMENDMENT to change the land use designation from Residential-Medium to Light Industrial and a REZONE to change the zone from RM-2-4 (Residential Medium) to IL-1-1 (Industrial-Light). No development is being proposed as part of this project. The vacant 5.58--acre project site is located northeast of the terminus of Exposition Way and north and west of Innovative Drive (Figures 1 and 2). The project site is within the Otay Mesa Community Plan, Community Plan Implementation Overlay Zone Type A, Brush Management, Very High Fire Hazard Severity Zone, Prime Industrial Lands, Airport Land Use Compatibility Overlay Zone (Brown Field Airport [BFA]), Airport Influence Area (BFA, Review Area 1), 65-70 Airport Noise Contour (CNEL), Airport Safety Zone 2 and 3 (BFA), and the Federal Aviation Administration Part 77 Notification Area (BFA). LEGAL DESCRIPTION: Lot 1 of Ocean View Village according to Map No. 16245 filed December 21, 2017; APN 645-050-4400. APPLICANT: OnPoint Development.

I. SUMMARY OF ORIGINAL PROJECT

In 2013, the Otay Mesa Community Plan (OMCP) underwent an update including a General Plan Amendment (GPA), Community Plan Amendment (CPA), rescission of the Otay Mesa Development District, adoption of a Rezone Ordinance to replace the Otay Mesa Development District with citywide zoning and creation of two new Community Plan Implementation Overlay Zone (CPIOZ), amendments to the City of San Diego (City) Land Development Code (LDC), and an update of the OMCP Public Facilities Financing Plan (PFFP). The overall impacts of the 2013 OMCP were evaluated in a Program Environmental Impact Report (EIR; Project No. 30330/304032; SCH No. 2004651076) that was certified by the San Diego City Council on March 11, 2014, via Resolution No. R-308809 (hereinafter referred to as the OMCP FEIR).

The OMCP provides for a long-range, comprehensive policy framework for growth and development in the Otay Mesa community through the year 2062. The OMCP identified a land use strategy with new land use designation proposals to create villages, activity centers, and industrial/employment centers along major transportation corridors, while strengthening cultural and business linkages to Tijuana, Mexico via the Otay Mesa Port of Entry. The Land Use Element established a number of land use planning goals for the OMCP area including, but not limited to, the following: allowing a distribution of land uses that provides sufficient capacity for a variety of uses, facilities, and services

needed to serve the planning area: creating distinct villages that include places to live, work, and recreate; identifying locations for diversified commercial uses that serve local, community, and regional needs; and ensuring sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center.

The OMCP includes the same nine elements contained in the City's 2008 General Plan, with goals and policies for each element. The nine elements are: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; and Historic Preservation. Implementation of the OMCP requires subsequent approval of public or private development proposals (i.e., future development) to carry out the land use plan and demonstrate compliance with policies presented in the OMCP.

The OMCP FEIR concluded that the OMCP would result in significant and unavoidable environmental impacts to air quality, greenhouse gas (GHG) emissions, noise, transportation/circulation, and utilities. The following issue areas were determined to be significant but mitigated to below a level of significance with implementation of the mitigation framework included in the OMCP FEIR: land use, biological resources, historical resources, human health/public safety/hazardous materials, hydrology/water quality, geology/soils, and paleontological resources. All other impacts analyzed in the OMCP FEIR were determined to be less than significant.

The OMCP identifies five planning districts interconnected through activities and infrastructure. The project site is located within the Northwest District. The project site is currently designated as Residential - Medium which permits medium density multiple dwelling units. The site is currently zoned Residential - Multiple Unit 2-4 (RM-2-4), which permits a maximum density of 1 dwelling unit for each 1,750 square feet of lot area. This would allow 161 residential units. Prior to the adoption of the OMCP, the project site was part of a previous entitlement, Robinhood Ridge, which was approved in 1991 and would have allowed for 143 residential units on the project site under Vesting Tentative Map No. 86-1014. As the OMCP and accompanying FEIR reflect the more recent plans for site development, they are used to portray the existing development potential for the project site.

However, since adoption of the 2011 Brown Field Airport Land Use Compatibility Plan (ALUCP), residential uses do not conform with the Brown Field Safety Compatibility Zones present on the site. Safety Compatibility Zone 2 conditionally allows residential units at a density of 4 dwelling units per acre (du/ac) or less. Densities greater than 4 du/ac are not allowed. Safety Compatibility Zone 3 allows residential units at a density of 4 du/ac or less and conditionally allows residential units at densities of 4 du/ac through 16 du/ac. Densities greater than 16 du/ac are not allowed (San Diego County Regional Airport Authority 2010). Under the existing residential zoning, the site could have up to 22 residential units in Safety Compatibility Zone 2 or up to 89 residential units with approved conditions in Safety Compatibility Zone 3.

The OMCP identified a CPIOZ Type A which applies to the project site. The CPIOZ Type A allows any project that is consistent with the community plan, the base zone regulations, and the supplemental regulations to be processed ministerially in accordance with the procedures of the CPIOZ (Municipal Code Chapter 13, Article 2, Division 14). The applicable CPIOZ Type A supplemental regulations require the following:

- Preparation of archaeological, paleontological, and biological surveys for any site that has not been previously graded or developed, stating that there is no presence of archaeological, paleontological, and biological resources on-site.
- Compliance with specific policies of the OMCP Urban Design Element for commercial or industrial projects.
- Construction of abutting streets to the classification identified in the Mobility Element of the OMCP.
- Documentation from a California Registered Traffic Engineer stating that the project's traffic volumes would be less than 1,000 average daily trips (ADT).

Any development that does not comply with the supplemental regulations for CPIOZ Type A and the regulations of the underlying zone shall be required to apply for a Process 3 CPIOZ Type B permit, which would require a discretionary review and shall be required to meet the purpose and intent of the regulations of the underlying zone and the supplemental development regulations.

II. SUMMARY OF PROPOSED PROJECT

The 5.58-acre project is a GPA and CPA to redesignate the land use from Residential-Medium to Light Industrial and a Rezone from the Residential Medium (RM-2-4) zone to the Light Industrial (IL-1-1) zone. No development is proposed with this project. The proposed rezone would remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses. The following uses that are currently not allowed in the existing RM-2-4 zone would be allowed with the proposed rezone to the IL-1-1 base zone:

- Agriculture (Aquaculture Facilities; Horticulture Nurseries & Greenhouses; Raising & Harvesting of Crops);
- Separately Regulated Agriculture Uses (Agriculture Equipment Repair Shops; Community Gardens²);
- Commercial Services (Building Services; Business Support; Eating & Drinking Establishments; Financial Institutions; Instructional Studios; Maintenance & Repair; Off-Site Services; Personal Services; Radio & Television Studios; Tasting Rooms);
- Separately Regulated Commercial Services Uses (Mobile Food Trucks; Parking Facilities as a Primary Use – Permanent Parking Facilities);
- Separately Regulated Commercial Services Uses¹
 - Eating and Drinking Establishments with a Drive-in or Drive-through Component; Fairgrounds; Golf Courses, Driving Ranges, and Pitch & Putt Courses; Helicopter Landing Facilities; Private Clubs, Lodges, and Fraternal Organizations; Privately Operated, Outdoor Recreation Facilities Over 40,000 square feet in size; Recycling Facilities: Mixed Organic Composting Facility and Tire Processing Facility;
- Separately Regulated Commercial Services Uses²
 - Boarding Kennels/Pet Day Care Facilities; Parking Facilities as a Primary Use: Temporary Parking Facilities; Recycling Facilities: Large Collection Facilities, Large Construction &

Demolition Debris Recycling Facility, Small Construction & Demolition Debris Recycling Facility, Green Materials Composting Facility, Large Processing Facility Accepting All Types of Traffic, and Small Processing Facility Accepting All Types of Traffic; Veterinary Clinics and Animal Hospitals;

- Separately Regulated Commercial Services Uses³
 - Assembly and Entertainment Uses, including Places of Religious Assembly;
 - Pushcarts on Private Property;
 - Recycling Facilities: Small Collection Facility, Drop-off Facility, Large Processing Facility Accepting at least 98% of Total Annual Weight of Recyclables from Commercial & Industrial Traffic, Small Processing Facility Accepting at least 98% of Total Annual Weight of Recyclables from Commercial & Industrial Traffic, and Reverse Vending Machines;
 - Sidewalk Cafes, Streetaries, and Active Sidewalks;
- Distribution and Storage (Equipment & Materials Storage Yards; Moving & Storage Facilities; Distribution Facilities)
- Separately Regulated Distribution and Storage Uses (Junk Yards³; Temporary Construction Storage Yards Located Off-Site³)
- Industrial (Light Manufacturing; Marine Industry: Research & Development: Testing Labs; Trucking & Transportation Terminals);
- Separately Regulated Industrial Uses (Artisan Food & Beverage Producer; Marine-Related Uses within the Coastal Overlay Zone; Newspaper Publishing Plants; Processing and Packaging of Plant Products and Animal By-Products Grown Off Premises);
- Separately Regulated Industrial Uses:¹ Cannabis Production Facilities; Hazardous Waste Research Facilities; Hazardous Waste Treatment Facility; Mining and Extractive Industries; Wrecking & Dismantling of Motor Vehicles;
- Separately Regulated Institutional Uses:¹ Airports; Battery Energy Storage Facility: Medium Scale (0.25 acre < 1 acre), Large (> 1 acre); Cemeteries, Mausoleums, and Crematories; Correctional Placement Centers, Exhibit Hall and Convention Facilities, Historical Buildings Used for Purposes Not Otherwise Allowed; Major Transmission, Relay, or Communications Switching Stations; Social Service Institutions);
- Separately Regulated Institutional Uses:³ Small Scale (≤ 0.25 acre) Battery Storage Facility; Electric Vehicle Charging Stations, Flood Control Facilities; Outdoor Dining on Private Property; Satellite Antennas; Solar Energy Systems;
- Offices: Regional & Corporate Headquarters;
- Separately Regulated Residential Uses:³ Watchkeeper Quarters;
- Retail Sales: Building Supplies & Equipment; Food, Beverages, and Groceries; Sundries, Pharmaceuticals, and Convenience Sales; Wearing Apparel & Accessories;
- Separately Regulated Retail Sales Uses: Agriculture Related Supplies & Equipment);
- Separately Regulated Retail Sales Uses:¹ (Swap Meets & Other Large Outdoor Retail Facilities;

- Separately Regulated Retail Sales Uses:³ Weekly Farmers' Market; Daily Farmers' Market Stands; Retail Tasting Stores)
- Separately Regulated Vehicle & Vehicular Equipment Sales & Service Uses: Automobile Service Stations;³ Outdoor Storage & Display of New Unregistered Motor Vehicles as a Primary Use; Vehicle Storage Facilities as a Primary Use;³
- Vehicular Equipment Sales and Service: Commercial Vehicle Repair & Maintenance; Commercial Vehicle Sales & Rentals; Personal Vehicle Repair & Maintenance; Personal Vehicle Sales & Rentals; and Vehicle Equipment & Supplies Sales & Rentals.

Notes:

¹Conditional Use Permit Required

²Neighborhood Permit Required

³Limitations

Future Development Scenarios

Considering the site is within the CPIOZ Type A overlay, any future development generating less than 1,000 average daily trips (ADT) could be processed ministerially and would be subject to the CPIOZ Type A supplemental regulations as detailed in Section I. Any proposed use that would generate 1,000 ADT or more would be subject to a subsequent environmental review, consistent with the CPIOZ Type B. Therefore, for purposes of the environmental analysis in this addendum, the potential impacts of a project generating up to 999 ADT are analyzed for all issues except for air quality and GHG emissions, which evaluate a reasonably foreseeable worst case scenario project regardless of the CPIOZ Type B requirement. This was done in order to demonstrate compliance with the significance thresholds in the City's Climate Action Plan (CAP), which was adopted after the certification of the OMCP FEIR. For purposes of GHG emissions, the most intensive, reasonably foreseeable use that would be allowed in the IL-1-1 zone is evaluated.

This analysis assumes that the highest ADT-generating, reasonably foreseeable project could be built on the site based on the allowed uses in the IL-1-1 zone and the maximum floor-to-area (FAR) ratio of 0.5, which equals 121,532 square feet of development. This conservative hypothetical project represents one that would generate the highest ADT, is most reasonably foreseeable based on site and location limitations, and would occupy the greatest possible square footage. ADT is used as proxy for GHG emissions because the majority of operational GHG is generated by motor vehicle use.

Given the proposed zoning, site location, and proximity to the Brown Field Airport, a study of various land uses and their corresponding ADT generation rates revealed that a maintenance and repair light industrial use would be the highest trip-generating land use with a total of 2,430 ADT. The City's Trip Generation Manual (City of San Diego 2003) was used to compare ADT between various land uses. As mentioned above, this highest trip-generating land use scenario is only used in the GHG and air quality sections of this addendum to provide a CPIOZ Type B level of assessment.

III. ENVIRONMENTAL SETTING

The 5.58-acre project site is undeveloped and located just northeast of the current terminus of Exposition Way, north of Corporate Center Drive (see Figures 1 and 2). The project site borders open space to the north, east, and west as well as vacant properties to the south. Lands to the south are zoned CN-1-2 (Neighborhood Commercial) and IL-1-1 (Industrial Light), and undeveloped lands to the north, east, and west are zoned OC-1-1 (Open Space – Conservation). The project site is physically separated from existing residential development to the north by approximately 0.04 mile (Figure 3). The project site is sloped with site elevations ranging from 475 feet above mean sea level (MSL) to 520 feet above MSL and contains a small area of slopes of 25% or greater on the northern portion of the project site associated with the adjacent slope. There are no Multi-Habitat Planning Area (MHPA) lands directly adjacent to the site; however, there is MHPA land approximately 0.3 mile northeast and southwest of the project site.

The project site is within the Otay Mesa Community Plan, Community Plan Implementation Overlay Zone – Type A, Brush Management, Very High Fire Hazard Severity Zone, Airport Land Use Compatibility Overlay Zone (Brown Field Airport [BFA]), Airport Influence Area (BFA, Review Area 1), 65-70 dBA Airport Noise Contour (CNEL), Airport Safety Zones 2 and 3 (BFA), and the Federal Aviation Administration Part 77 Notification Area (BFA). Services and utilities are available to the site and are within nearby public roadways.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the OMCP FEIR (Project No. 30330/304032/SCH No. 2004651076), per Resolution No. R-308809 on March 11, 2014. Based on all available information, the analysis in this EIR Addendum, and in light of the entire record, the City has determined pursuant to Section 15162 and 15164 of the State CEQA Guidelines that:

- There are no substantial changes proposed in the project which will require major revisions of the previous environmental document due to new significant environmental effects or a substantial increase in the severity of impacts identified in the previous FEIR;
- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous FEIR to disclose new significant environmental effects or a substantial increase in the severity of impacts previously identified in the FEIR; or
- There is no new information of substantial importance, which was not known and could not have been known at the time the previous FEIR was certified, that shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous FEIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous FEIR;

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current project, none of the conditions described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested which would result in new significant or substantially increased adverse impacts as a result of the project. Therefore, this EIR Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. The OMCP has been incorporated by reference pursuant to CEQA Guidelines Section 15150.

Public review of this EIR Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the environmental issues analyzed in detail in the previously certified OMCP FEIR as well as the environmental analysis for the project pursuant to the CEQA. The analysis in this document evaluates the adequacy of the OMCP FEIR and documents that the currently proposed modifications and/or refinements would not cause new or more severe significant impacts than those identified in the previously certified FEIR. As no development is proposed, the analysis is based on allowed uses under the proposed IL-1-1 zone including application of the existing Otay Mesa CPIOZ Type A.

The OMCP FEIR identified significant unavoidable impacts relative to air quality, greenhouse gas (GHG) emissions, noise, transportation/circulation, and utilities. The OMCP FEIR identified significant but mitigated impacts to land use, biological resources, hydrology/water quality, historical resources, human health/public safety/hazardous materials, paleontological resources, and geology/soils. Impacts associated with visual effects and energy were found to be less than significant. An overview of the project's impacts in relation to the previously certified OMCP FEIR is provided in Table 1.

Table 1 Impact Assessment Summary			
Environmental Issues	OMCP FEIR Finding	Project	Project Resultant Impact
Land Use	Significant but mitigated	No new impacts	Less than significant
Visual Effects and Neighborhood Character	Less than significant	No new impacts	Less than significant
Air Quality/Odor	Significant, unavoidable	No new impacts	Impacts would remain significant and unavoidable
Biological Resources	Significant but mitigated	No new impacts	Less than significant
Historical Resources	Significant, but mitigated	No new impacts	Less than significant
Human Health/ Public Safety/ Hazardous Materials	Significant, but mitigated	No new impacts	Less than significant
Hydrology/Water Quality	Significant but mitigated	No new impacts	Less than significant
Geology/Soils	Significant but mitigated	No new impacts	Less than significant
Energy Conservation	Less than significant	No new impacts	Less than significant
Noise	Significant, unavoidable	No new impacts	Impacts would remain significant and unavoidable
Paleontological Resources	Significant but mitigated	No new impacts	Less than significant
Transportation/Circulation	Significant, unavoidable	No new impacts	Impacts would remain significant and unavoidable
Public Services and Recreation	Less than significant	No new impacts	Less than significant
Public Utilities	Significant, unavoidable	No new impacts	Impacts would remain significant and unavoidable
Water Supply	Less than significant	No new impacts	Less than significant
Population and Housing	Less than significant	No new impacts	Less than significant
Agricultural and Mineral Resources	Less than significant	No new impacts	Less than significant
Greenhouse Gas Emissions	Significant, unavoidable	No new impacts	Impacts would remain significant and unavoidable

Land Use

OMCP FEIR

Land Use is discussed in Section 5.1 of the OMCP FEIR that concluded that implementation of the OMCP would not result in impacts related to conflicts with applicable local and regional land use plans. Therefore, impacts were identified to be less than significant.

The OMCP FEIR identified that residential and industrial uses collocated in proximity to one another could result in incompatible land use impacts. The OMCP FEIR further identified that future development projects would be required to comply with the collocation policies of the General Plan and Community Plan Update (CPU) to reduce or avoid potential land use incompatibility impacts. The OMCP FEIR determined that compliance with the CPU and General Plan policies, along with local, state, and federal regulations, would reduce potential impacts of collocation to below a level of significance. The CPU would require the conversion of industrial and agricultural lands to residential and other mixed uses. The environmental effects that would result include the increased potential for exposure of sensitive receptors to hazardous materials. Through implementation of the measures identified in Section 5.6, the potential environmental impacts resulting from change in land use designations in accordance with the CPU were determined to be less than significant.

The OMCP FEIR identified that the development footprint of the CPU would encroach into sensitive Environmentally Sensitive Lands (ESL) areas. Additionally, implementation of the CPU would have the potential to result in significant impacts to historical resources given the presence of historical resources throughout the CPU area. However, future projects would require subsequent environmental review and compliance with CPU policies, development standards, as well as adherence to the ESL regulations, Historical Resources regulations, and site-specific mitigation, as applicable, in accordance with the mitigation framework. Therefore, program-level impacts were concluded to be mitigated to below a level of significance.

Potentially significant impacts of future development on land designated as MHPA by the City's Multiple Species Conservation Program (MSCP) Subarea Plan were identified in the OMCP FEIR. The impacts identified were associated with indirect impacts wherever development and human activity would interface with MHPA lands. The OMCP FEIR concluded that impacts could be significant, but through compliance with established standards and regulations and as well as the mitigation framework would serve to reduce impacts to below a level of significance to MHPA Lands.

Project

The project site is located within the Northwest District of the OMCP area and is directly adjacent to the Brown Field Airport District that is characterized as having light and heavy industrial land uses. The project would include a GPA and CPA to amend the OMCP land use designation of the project site from Residential Medium to Light Industrial. Additionally, the proposed Rezone would change the site's base zone from Residential Medium (RM-2-4) to Light Industrial (IL-1-1). The proposed Rezone would allow for light industrial uses that would be consistent with the existing land use and zoning designations located adjacent to the southern project boundary. The site immediately adjacent to the north is designated open space and serves as a barrier between industrial uses and the residential community to the north. Due to the separation of the site from the residential areas to the north and the change in elevation, land use and noise incompatibilities are not anticipated. However, at the time a specific development is proposed, site-specific analysis of land uses including noise generation and site design to ensure compatibility with surrounding uses would be required. The OMCP anticipated potential land use compatibility conflicts between industrial and residential land uses and incorporated policies specifically focused on ensuring compatibility between these uses. Applicable policies that would apply to future development of the site including an explanation of how the policy would serve to ensure land use conflicts and incompatibilities would be avoided

are listed below in Table 2., including an explanation of how the policy would serve to ensure land use conflicts and incompatibilities would be avoided.

Furthermore, application of the OMCP CPIOZ Type A would limit the intensity of ministerial light industrial development on the site to those uses that would generate less than 1,000 ADT, avoiding potential incompatibilities associated with a high trip generation use. Any proposed development that would generate 1,000 ADT or more would be subject to future discretionary review consistent with the OMCP CPIOZ Type B.

City General Plan/Otay Mesa Community Plan

The project would be consistent with the City of Villages Strategy goals, City General Plan and OMCP policies as detailed in Table 2. Specifically, the OMCP emphasizes the need to enhance and sustain Otay Mesa’s strong economic base and provide sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center (City of San Diego 2014). Table 2 also discusses specific policies that would be implemented on the site that would ensure land use compatibility with surrounding land uses.

Table 2 General Plan and Otay Mesa Community Plan Policy Consistency	
Goal/Policy	Consistency Analysis
General Plan Land Use and Community Planning Element: City of Villages Strategies	
Goal: Sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center	The project would allow for Light Industrial development on the project site which would support Otay Mesa as a subregional employment center by allowing development of uses such as light manufacturing, distribution and storage uses.
Goal: A land use pattern that is compatible with existing and planned airport operation	The project would allow for Light Industrial development within Safety Zone 2 and 3 of Brown Field Airport. Light industrial uses which could include light manufacturing, distribution and storage uses would be compatible with Safety Zone 2 and 3. The project would increase compatibility with the airport by removing the residential designation and zone which is not compatible with current airport operations. Future development would be subject to the development regulations applicable to the City's Airport Land Use Compatibility Overlay Zone (ALUCOZ) and would require a Land Use Compatibility Plan (ALUC) consistency determination and a Federal Aviation Administration (FAA) determination of No Hazard to Air Navigation.
Policy LU-2.4-4: Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.	The project would result in a Rezone to Light Industrial which would be consistent with the zoning and land use designation of the parcels to the south. The project site is physically separated from existing residential development by approximately 0.04 mile to the north. At the time a specific project is proposed, consistency with OMCP policies, General Plan Noise Element policies, and compliance with the City's landscape

**Table 2
General Plan and Otay Mesa Community Plan Policy Consistency**

Goal/Policy	Consistency Analysis
	<p>regulations would be required to ensure compatibility between land uses. For example:</p> <ul style="list-style-type: none"> • OMCP and General Plan policies would address the orientation of the building and siting of noise generating uses (such as loading docks) away from sensitive use areas. • Noise attenuation measures could be required to ensure noise levels at adjacent properties are consistent with applicable limits. • Where visible from residential areas, truck storage and loading areas would need to be screened from view and walls and landscaping proposed to ensure land use compatibility. <p>Application of the CPIOZ Type A for any project generating less than 1,000 ADT and the requirement for a future discretionary review for any project generating 1,000 ADT or more would ensure OMCP policies are implemented that avoid land use incompatibilities through buffers and other design measures.</p>
Otay Mesa Community Plan	
Goal: Sufficient industrial land capacity to maintain Otay Mesa as a subregional employment center	The project would support additional light industrial development in Otay Mesa.
Goal: A land use pattern that is compatible with existing and planned airport operation	The project would allow for Light Industrial development within Safety Zone 2 and 3 of Brown Field Airport. Light industrial uses which could include light manufacturing, distribution and storage uses would be compatible with Safety Zone 2 and 3. Future development would be subject to the development regulations applicable to the City's ALUCOZ and would require an ALUC consistency determination and an FAA determination of No Hazard to Air Navigation.
Goal: An effective transit network that provides fast and reliable service to local and regional destinations	The Otay Mesa Community Plan Mobility Element identifies Vista Santo Domingo, which currently terminates just north of the project site, as a two-lane collector that would ultimately connect the project site to the residential community to the north. The project would not preclude the ultimate connection of Vista Santo Domingo to the south to Exposition Way.
Goal: Functional industrial corridors with a high-quality design standard	The OMCP provides "Policies and Recommendations" for future industrial development within the OMCP area. These policies, 4.5-1 through 4.5-8, are listed in the OMCP Urban Design Element. They include specifications for lot configuration, exterior quality, use of vegetation and landscaping, access and orientation toward the street(s), fencing and screening, the provision of semi-public spaces for employees, and the use of energy-saving technology.

Table 2	
General Plan and Otay Mesa Community Plan Policy Consistency	
Goal/Policy	Consistency Analysis
	As described in the OMCP Urban Design Element, these policies "should be used in conjunction with all applicable policies from the General Plan" when reviewing project proposals. The application of these OMCP policies would ensure that future development of the site would be consistent with the existing surrounding development in terms of use, bulk and scale and would not result in an adverse aesthetic impact to the community. Compliance with these measures would ensure consistency with this goal in creating high-quality designed industrial corridors.
<p>Policy 2.2-1: 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 landscaping, fencing, setbacks, off-setting planes and other urban design techniques. d. Develop remaining undeveloped neighborhoods with a variety of housing types, and target the upper limits of the density ranges. 	<p>The project site is currently designated as Residential - Medium which permits medium density multiple dwelling units. The site is currently zoned Residential - Multiple Unit 2-4 (RM-2-4) which permits a maximum density of 1 dwelling unit for each 1,750 square feet of lot area. However, since adoption of the 2011 Brown Field Airport Land Use Compatibility Plan, residential uses do not conform with the Brown Field Safety Compatibility Zones present on the site. The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area and, as described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones. The proposed rezone would conform to the Brown Field Airport Land Use Compatibility Plan by removing the allowance for residential uses from the site and allow for other commercial and light industrial land uses.</p> <p>The proposed rezone would not adversely affect the availability of residential properties in the community. Due to its location within Brown Field Airport Safety Zones 2 and 3, the site is not compatible with residential uses. The Northwest District area is mostly developed already and is considered an area with little opportunity for change. The Southwest and Central Villages represent areas of opportunity for village and housing development. The City of Villages strategy has encouraged future development in Otay Mesa that will increase the housing supply. Sufficient residential capacity will exist within the OMCP considering a number of recently authorized or entitled community plan amendments that would amend the OMCP to allow more residential use.</p> <p>The project would complement the adjacent properties to the south and east which are zoned for Light Industrial and through the application of the CPIOZ OMCP policies</p>

Table 2 General Plan and Otay Mesa Community Plan Policy Consistency	
Goal/Policy	Consistency Analysis
	<p>land use incompatibilities would be avoided through buffers and other design measures.</p> <p>The existing and planned capacity for residential land use within the Otay Mesa community, combined with the demand for industrial land uses supports the proposed Rezone from a land use perspective and would not conflict with General Plan goals for a balanced land use plan supporting the City of Villages strategy. Therefore, the project would not conflict with or be incompatible with the adjacent land uses or relevant land use plans. Impacts would be less than significant.</p>
<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.</p>	<p>Since adoption of the 2011 Brown Field Airport Land Use Compatibility Plan, residential uses do not conform with the Brown Field Safety Compatibility Zones present on the project site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses. The project site is located within the Northwest District area and is not designated within a Village of Otay Mesa that encourages residential development to this community.</p>
<p>Policy 2.2-3: Include in all residential developments housing units that are sized to meet the household family sizes anticipated in Otay Mesa.</p>	<p>The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area. As described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones, which limits the development of the site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses.</p>
<p>Policy 2.2-4: Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.</p>	<p>The project site is physically separated from existing residential development by approximately 190 feet to the north. At the time a specific project is proposed, consistency with OMCP policies, General Plan Noise Element policies, and compliance with the City's landscape regulations would be required to ensure compatibility between land uses. For example:</p> <ul style="list-style-type: none"> • OMCP and General Plan policies would address the orientation of the building and siting of noise generating uses (such as loading docks) away from sensitive use areas. • Noise attenuation measures could be required to ensure noise levels at adjacent properties are consistent with applicable limits.

**Table 2
General Plan and Otay Mesa Community Plan Policy Consistency**

Goal/Policy	Consistency Analysis
	<ul style="list-style-type: none"> Where visible from residential areas, truck storage and loading areas would need to be screened from view and walls and landscaping proposed to ensure land use compatibility. <p>Application of the CPIOZ Type A for any project generating less than 1,000 ADT and the requirement for a future discretionary review for any project generating 1,000 ADT or more would ensure OMCP policies are implemented that avoid land use incompatibilities through buffers and other design measures.</p> <p>The project site abuts properties that allow industrial land uses such as agricultural equipment repair shops, funeral and mortuary services, distribution facilities, and other light industrial uses that could generate hazardous emissions. Adjacent land uses could allow for construction and operation of future uses that could result in transport, use, and disposal of hazardous waste. The rezone to Light Industrial would avoid potential impacts associated with collocation for light industrial and residential interface areas, incompatible land uses, and residential exposure to these industrial uses.</p>
<p>Policy 2.2-5: Develop housing at different density ranges to provide housing affordable to all income levels.</p>	<p>The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area. As described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones, which limits the development of the site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses. The existing and planned capacity for residential land use within the Otay Mesa community, combined with the demand for industrial land uses supports the need for the proposed Rezone from a land use perspective and would not conflict with General Plan goals for a balanced land use plan supporting the City of Villages strategy.</p>
<p>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.</p>	<p>The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area. As described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones, which limits the development of the site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses.</p>

Table 2	
General Plan and Otay Mesa Community Plan Policy Consistency	
Goal/Policy	Consistency Analysis
<p>Policy 2.2-7: Promote the production of very-low and low-income affordable housing in all residential and village designations.</p> <ul style="list-style-type: none"> e. Support development of on-site inclusionary housing within all specific plan proposals. f. Encourage on-site inclusionary housing within all residential development proposals. 	<p>The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area. As described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones, which limits the development of the site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses.</p>
<p>Policy 2.2-8: Create affordable home ownership opportunities for moderate income buyers.</p> <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. 	<p>The project site is located within Safety Zone 2 and 3 of the Brown Field Municipal Airport influence area. As described under Section I of this Addendum, residential uses are permitted with limited density within these Safety Zones, which limits the development of the site. The proposed rezone would resolve the conflict between the regulations of the Brown Field ALUCP and remove the allowance for residential uses from the site and increase allowances for other commercial and light industrial land uses.</p>
<p>Policy 4.1-10: Create a visual and distance separation between the public right-of-way and industrial uses such as auto dismantling, truck transportation terminals, and other uses that create noise, visual, or air quality impacts. Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening.</p>	<p>The OMCP provides "Policies and Recommendations" for future industrial development within the OMCP area. These policies, 4.5-1 through 4.5-8, are listed in the OMCP Urban Design Element. They include specifications for lot configuration, exterior quality, use of vegetation and landscaping, access and orientation toward the street(s), fencing and screening, the provision of semi-public spaces for employees, and the use of energy-saving technology.</p> <p>As described in the OMCP Urban Design Element, these policies "should be used in conjunction with all applicable policies from the General Plan" when reviewing project proposals. The application of these OMCP policies would ensure that future development of the site would be consistent with the existing surrounding development in terms of use, bulk and scale and would not result in an adverse aesthetic impact to the community. Compliance with these measures would ensure consistency with this goal in creating high-quality designed industrial corridors.</p>
<p>Policy 8.7-5: Maintain an adequate buffer with transitional uses between land uses that allow sensitive receptors and the truck routes.</p>	<p>Any future discretionary development would be required to demonstrate consistency with OMCP mitigation measures. Future development of the site would be required to implement site design features, such as buffers between air pollution sources and sensitive receptors using landscaping, open space, and other separation techniques. During the site design for a future light industrial use, noise generating aspects of the project would need to be located away from the open</p>

Table 2 General Plan and Otay Mesa Community Plan Policy Consistency	
Goal/Policy	Consistency Analysis
	space zoned parcel. Buildings and walls could be designed to provide noise attenuation to increase compatibility between uses.

The project would complement the adjacent properties to the south, which are zoned for Light Industrial. Additionally, as presented in Table 2, the project would be consistent with relevant City policies relating to Light Industrial development. Additionally, the application of the CPIOZ Type A supplemental regulations for any project generating less than 1,000 ADT would include a ministerial review to ensure OMCP policies are implemented that would avoid land use incompatibilities through buffers and other design measures.

The proposed rezone would not adversely affect the availability of residential properties in the community. Due to its location within Brown Field Airport Safety Zones 2 and 3, residential land uses are limited to lower densities on the project site (see Section I of this Addendum). Sufficient residential capacity will exist within the OMCP considering a number of recently authorized or entitled community plan amendments that would amend the OMCP to allow more residential use, including:

- PA 61 Residential: On June 4, 2019, the City Council approved a community plan amendment to redesignate 9.2 acres of a 14.6-acre site from Community Commercial (Residential Prohibited) to Residential – Medium (15 – 29 du/ac) and a rezone to RM-2-5. The City Council also approved up to 45,000 square feet of commercial uses on the 4.46-acre portion and 267 homes on 9.2-acre portion. Subsequently, an addendum to replace the previously approved 45,000 SF of commercial uses with development of 79 multi-family dwelling units was approved by City Council on November 15, 2022.
- BDM Mixed Use: On May 23, 2023, the City Council approved the BDM Mixed Use project with a community plan to redesignate a 14.16-acre site from amendment and rezone for the properties on southside of Otay Mesa Road between Emerald Crest Court and Corporate Center Drive. The amendment changed the land use from Community Commercial (Residential Prohibited) to Community Commercial (Residential Permitted) and a rezone to CC-3-6. The City Council also approved a development with 6,000 square feet of commercial floor area and 430 homes with 53 of the homes being affordable.
- PA 61 Commercial: On November 15, 2022, the City Council approved a community plan amendment to redesignate a 4.46-acre site located on the southeast corner of Caliente Avenue and Otay Mesa Road from Community Commercial (Residential Prohibited) to Residential Medium (15 – 29 du/ac) and a rezone to RM-2-5 to allow residential development. The City Council also approved a development with 79 homes with 8 of the homes being affordable.
- Del Sol Village: On July 22, 2021, the Planning Commission approved an initiation of community plan amendment to redesignate a 14.08-acre site located between two existing roadway sections of Del Sol Boulevard from Open Space to Residential-Medium High (30-44 du/ac). This would allow the development of 422 to 617 multifamily dwelling units, as well as the construction of the missing segment of the Del Sol Boulevard roadway. The City

received an application for a plan amendment and rezone with a proposed development with 571 homes.

- Nakano: On October 27, 2022, the Planning Commission approved the initiation of an amendment to the Otay Mesa Community Plan to designate a 23.8-acre property within the City of Chula Vista to a Residential Low – Medium (10-24 du/ac). The applicant is proposing up to 221 homes as part of a future annexation action.

The existing and planned capacity for residential land use within the Otay Mesa community, combined with the demand for industrial land uses supports the need for the proposed Rezone from a land use perspective and would not conflict with General Plan goals for a balanced land use plan supporting the City of Villages strategy. Therefore, the project would not conflict with or be incompatible with the adjacent land uses or relevant land use plans. Impacts would be less than significant.

City of San Diego Municipal Code/Land Development Code

The purpose of the City's ESL regulations (LDC Sections 143.0101 – 143.0160) is to protect, preserve, and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The project site does not include steep hillsides, or coastal bluffs, and is not located within the 100-year floodplain. The project site is located outside of and not adjacent to MHPA; however, the site has the potential to support burrowing owl habitat and is therefore considered ESL.

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project; however, the project would allow for future industrial development. Therefore, impacts to ESL would not occur as a result of this action; however, future development could result in indirect impacts (e.g., drainage, lighting, or noise) to nearby MHPA areas to the east or west of the project site. Consistent with the CPIOZ-A requirements for ministerial projects, the project would be required to conduct biological surveys because it has not been previously graded or developed and state that no biological resources exist on-site.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Visual Effects and Neighborhood Character

OMCP FEIR

Section 5.2 of the OMCP FEIR provides an analysis of visual effects and neighborhood character impacts associated with the OMCP update. Potential impacts could result to the following: public views; alteration of the communities' visual character by introducing development that is incompatible with the scale and design of surrounding development; the alteration of the existing landform through grading; and through a negative visual appearance due to the loss, covering, or

modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient.

The OMCP FEIR concluded that implementation of the CPU would not result in significant impacts to the existing or planned character of the area. The majority of the existing public views of canyons and mesas would be preserved under the CPU and to prevent impacts to views of public resources, the CPU included designating view corridors and gateways through plan policies and project design features. With compliance with the CPU policies as well as inclusion of these project design features, impacts to public views would be less than significant.

The OMCP FEIR determined that impacts associated with compatibility with surrounding neighborhood character would be less than significant, as future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and CPU. The OMCP FEIR determined that vacant, graded areas within the Northwest District are not considered visually sensitive and future development would improve visual compatibility with existing development. The plan envisioned the conversion of parcels and agricultural uses in this part of the planning area to industrial uses, anticipating that these industrial uses would be large warehouse-type structures and automotive lots. The OMCP FEIR determined that this intensification of industrial uses in this area would be consistent with the existing character of this part of the Northwest District, and that impacts would be less than significant.

Through implementation of the plan update, the visual character of the CPU area would become more urbanized. The land use and development design guidelines and policies of the CPU are intended to ensure that future development within the CPU area would not result in architecture, urban design, landscaping, or landforms that would negatively affect the visual quality of the area, or strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. Future development would be required to comply with the relevant land use and development design guidelines and policies of the General Plan and CPU. In addition, development in areas designated for commercial and industrial uses on properties that have been previously graded and developed with structures that conform to the Urban Design Element would be subject to review in accordance with CPIOZ A. Development proposals that do not comply with the CPIOZ A supplemental regulations would be subject to discretionary review in accordance with CPIOZ B. Therefore, impacts would be less than significant.

Impacts associated with landform alteration would be less than significant, as future development would be required to comply with the relevant land use and development regulations, grading ordinance, ESL regulations, and relevant land use and development design guidelines and policies of the General Plan and CPU. Impacts would be less than significant.

The OMCP FEIR identified that the CPU could result in a negative visual appearance due to the loss, covering, or modification of any unique physical features such as a natural canyon or hillside slope in excess of 25 percent gradient. Future development would be required to comply with relevant development regulations, ESL regulations, and relevant land use and development design guidelines and policies of the General Plan and CPU. Therefore, impacts would be less than significant. Overall, adherence to existing policies and regulations, as well as implementation of the CPU policies would ensure that potential impacts would be below a level of significance.

Project

The project site is located within the Northwest District of the Otay Mesa community as delineated in the OMCP. The Northwest District, as shown in Figure 2-2 of the OMCP, consists of a mix of industrial, residential, open space and commercial uses. The project site is bordered by existing vacant undeveloped industrial land located immediately to the south. Land to the north, east, and west is open space. According to Figure 5.2-8 of the OMCP FEIR, there are no view corridors or gateway areas adjacent to or in proximity of the project site. Additionally, scenic amenities, such as public views of canyons and mesas, are not within the viewshed of the project site.

The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project. However, the project site is currently zoned for RM-2-4, Residential Medium, and designated as Residential Medium in the OMCP. Buildout of the project site in accordance with the OMCP would result in up to 161 multi-family residential units. The character of this type of development project would be similar to that of the multi-family residential units to the north of the project site. The maximum structure height for RM-2-4 zones is 40 feet, and the FAR is 1.2 for 1 to 7 dwelling units or 1.25 for 8 or more dwelling units. The maximum permitted density would equate to one dwelling unit for each 1,750 square feet of lot area.

In comparison, a light industrial land use would be consistent with the bulk and scale allowed in the zoning of the parcels immediately south of the site, and the character of the industrial business park uses further south of the project site. Table 131-06C of Chapter 13, Zones, of the City of San Diego Municipal Code provides the development restrictions, including height restrictions, for all industrial zones. As noted on Table 131-06C, all industrial development projects within the OMCP area would have a maximum FAR of 0.5. This would result in less overall mass than would buildout of the site in accordance with RM-2-4 zoning (FAR 1.2 or 1.25). Building heights under the proposed IL-1-1 zone would be similar to those of the IL-2-1 zones to the south. Height limits for structures in the industrial zones are only limited by the community plan implementation overlay zone regulations in Chapter 13, Article 2, of the City of San Diego's Municipal Code. For this project, the community plan implementation overlay zone would be the OMCP.

The site is not visible from the residential areas to the north of the project site or from any view corridors due to intervening topography. The nearest view corridor, as identified in the OMCP, is on Otay Valley Road south of Avenida de las Vistas. The topography surrounding this view corridor blocks views of the project site; therefore, the project would not affect this view corridor.

Future development would be required to adhere to applicable zoning in addition to Community Plan land use policies to ensure consistency in size and scale of surrounding land uses. Additionally, the OMCP includes design guidelines applicable to industrial development and implementation of these guidelines would ensure that development of the site would be consistent with the existing surrounding development in terms of use, bulk and scale and would not result in an adverse aesthetic impact to the community. Impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Air Quality

OMCP FEIR

Section 5.3 of the OMCP FEIR provides an analysis of air quality impacts associated with the OMCP.

The OMCP FEIR determined that development occurring as a result of implementing the CPU would not obstruct or conflict with the implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portion of the State Implementation Plan, as the change in land uses under the CPU and the traffic generated under the CPU would result in fewer emissions than the adopted community plan upon which the current RAQS is based, resulting in a less than significant impact.

The OMCP FEIR concluded that the CPU could result in air quality impacts related to criteria pollutant emissions from construction and operation of a project within the CPU area. The OMCP FEIR included mitigation measure AQ-1, which would require best available control measures/technology to be implemented during construction activities when construction emissions would exceed applicable thresholds, and mitigation measure AQ-2, which would require any future projects that significantly impact air quality to be conditioned with all reasonable mitigation to avoid, minimize, or offset the impact and to buffer sensitive receptors, such as residential development, through the use of landscaping, open space or other techniques. However, the OMCP FEIR determined that, while the mitigation framework and CPU policies would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts associated with criteria pollutant emissions would remain significant and unavoidable.

The OMCP FEIR identified impacts to sensitive receptors associated with carbon monoxide (CO) hotspots and diesel particulate matter (DPM) would be less than significant, as there would be no harmful concentrations of CO and localized air quality emissions would not exceed applicable standards, and the chronic risks resulting from diesel exhaust emissions associated with the vehicles operating within and adjacent to the CPU are projected to be less than significant and would not expose future residents or workers to significant cancer risk from traffic-generated diesel exhaust emissions.

Industrial uses could generate air pollutants, and without appropriate controls, air emissions associated with planned industrial uses could represent a significant adverse air quality impact as it relates to stationary sources. The OMCP FEIR included mitigation measure AQ-3, which requires an emissions inventory and health risk assessment to be prepared for any new facility that would have the potential to emit toxic air contaminants. However, even with implementation of the mitigation framework, impacts associated with stationary source emissions would remain significant and unavoidable. In addition, the OMCP FEIR determined that impacts associated with collocation of sensitive receptors with commercial and industrial uses could result in exposure of sensitive receptors to toxic air emissions, resulting in a significant impact. The OMCP FEIR included mitigation measure AQ-4, which requires a health risk assessment to be prepared for any project locating sensitive receptors closer than their recommended buffer distances to toxic air emitters. However, this impact likewise would remain significant and unavoidable.

The OMCP FEIR concluded that there are no known sources of specific, long-term odors within the Community Plan area, and that none of the identified land uses would typically be associated with

the creation of objectionable odors. In addition, the OMCP FEIR concluded that since the CPU did not include any new sources of odor that would affect sensitive receptors, impacts associated with odors would be less than significant.

Project

Plan Consistency

The project proposes a GPA, CPA, and Rezone to change the allowable uses within the project site from residential to industrial. A proposed change to the adopted OMCP land use plan could create an inconsistency relative to current air quality plans.

The previously allowed maximum density of 161 residential units would generate approximately 966 trips based on a trip rate of 6 trips per dwelling unit (City of San Diego 2003). The analysis in this section is based on the air quality modeling found in Appendix A.

The CPIOZ Type A limits ministerial development on the site to uses that would generate less than 1,000 ADT. Any use that would generate 1,000 ADT or more would be subject to discretionary review. When compared to the criteria pollutant emissions of the existing plans, this increase in ADT would not generate a substantially higher quantity of construction- or operation-related criteria pollutants for which the RAQS identifies as nonattainment (see Tables 4 and 7 below). Therefore, a future project that would generate less than 1,000 ADT would not conflict with existing air quality plans and impacts would be less than significant.

Conservatively, the most-intensive, reasonably foreseeable use land use – a manufacturing and repair use – would generate an estimated 2,430 ADT (at a rate of 20 trips per 1,000 square feet), which is more than the residential project estimated trip generation (City of San Diego 2003). This land use scenario would generate fewer criteria pollutants than would the existing plans during construction and more criteria pollutants than would the existing plans during operation because of the greater ADT number (see Tables 5 and 8).

Construction and Operational Emissions

Construction Emissions

Future development of the site with industrial land uses would have fewer construction-related criteria pollutant emissions as compared to the development of the site under the OMCP (161 residential units). The construction emissions for buildout of the site under the OMCP are shown on Table 3, and the differences that would result from the construction of 121,532 square feet of light industrial land uses (with a maximum estimated trip generation of 1,000 ADT) are shown on Table 4. As shown in Table 4, the development of the site with a 121,532-square-foot, 1,000 ADT-generating light industrial land use would result in 20.24 fewer pounds of reactive organic gases (ROG) per day and the same number of pounds of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), 10-micron particulate matter (PM₁₀), and 2.5-micron particulate matter (PM_{2.5}) per day.

Table 3 Construction Criteria Pollutant Emissions for Existing Plans (161 Multi-Family Residential Units)						
Year	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025	3.38	31.70	30.89	0.05	9.18	5.23
2026	48.57	7.17	10.51	0.01	0.45	0.32
Max	48.57	31.70	30.89	0.05	9.18	5.23
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Table 4 Construction Criteria Pollutant Emissions for 121,532-Square-Foot, 1,000-ADT Light Industrial Land Use						
Year	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025	3.38	31.70	30.89	0.05	9.18	5.23
2026	28.33	7.17	10.51	0.01	0.45	0.32
Max	28.33	31.70	30.89	0.05	9.18	5.23
<i>Change from existing plans</i>	<i>-20.24</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

As described in Section II, this addendum includes a conservative assessment using the highest ADT-generating, reasonable foreseeable potential site use to determine the greatest potential air quality and GHG impacts that could result from the proposed rezoning. A review of potential uses indicated that a maintenance and repair use would be the most foreseeable, greatest ADT-generating type of development project. At 0.5 FAR (121,532 square feet), this type of development would generate approximately 2,430 ADT. Construction-related air contaminants that would result from the construction of this type of land use – and a comparison to existing plans – is shown in Table 5.

Table 5 Construction Air Quality Emissions for the Highest ADT-Generating, Reasonably Foreseeable Potential Site Use (121,532 Square Feet of Maintenance and Repair Use)						
Year	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2025	3.38	31.70	30.89	0.05	9.18	5.23
2026	28.32	7.17	10.51	0.01	0.45	0.32
Max	28.33	31.70	30.89	0.05	9.18	5.23
<i>Change from existing plans</i>	<i>-20.24</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Similarly with the construction of a 1,000 ADT-generating, 121,532-square-foot light industrial land use, the construction of a 121,532-square-foot maintenance and repair space would reduce ROG pounds per day by 20.24, and it would have similar emissions of other contaminants.

The construction-related air quality impacts of both the 1,000 ADT-generating light industrial land use and the most feasible, greatest-ADT generating maintenance and repair use would not cause a significant difference when compared to the previously proposed land use. The proposed rezoning would not differ from the determinations of the OMCP FEIR.

Operational Emissions

Operational criteria pollutant emissions typically come from vehicle trips. To provide a comparison with the previously proposed 161-unit multi-family residential land use, the criteria pollutant emissions for this previously proposed land use is shown in Table 6. The 161-unit multi-residential housing community would generate approximately 8.25 pounds of ROG, 3.00 pounds of NO_x, 36.45 pounds of CO, 0.07 pounds of SO₂, 5.71 pounds of PM₁₀, and 1.50 pounds of PM_{2.5} during the summer months. In winter, these emissions would total 7.35 pounds of ROG, 3.17 pounds of NO_x, 25.88 pounds of CO, 0.06 pounds of SO₂, 5.70 pounds of PM₁₀, and 1.50 pounds of PM_{2.5} per day.

Table 6						
Operational Air Quality Emissions for Existing Plans (161 Multi-Family Residential Units)						
	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	3.85	2.63	27.20	0.06	5.68	1.47
Area	4.38	0.09	9.13	0.00	0.00	0.00
Energy	0.02	0.29	0.12	0.00	0.02	0.02
Total	8.25	3.00	36.45	0.07	5.71	1.50
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Winter						
Mobile	3.76	2.88	25.76	0.06	5.68	1.47
Area	3.57	0.00	0.00	0.00	0.00	0.00
Energy	0.02	0.29	0.12	0.00	0.02	0.02
Total	7.35	3.17	25.88	0.06	5.70	1.50
<i>Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Operational criteria pollutant emissions associated with a future potential light industrial use are unknown as no specific project is proposed; however, as the main contributor of operational emissions is typically vehicle trips, this quantitative data is used for comparison with the previous project. The application of the CPIOZ Type A would limit ministerial development on the site to uses that would generate less than 1,000 ADT. Any proposed site use that exceeds 1,000 ADT or more would be considered a discretionary project and would be required to complete additional environmental analysis, including a site-specific evaluation of operational emissions and identification of measures to ensure operational emissions are minimized to the extent feasible.

Since 1,000 ADT is 34 trips greater than the estimated 966 ADT based on the maximum buildout of 161 residential units under the OMCP, this Addendum addresses the increase in air quality emissions that would result from this increase in ADT. Table 7 shows the air quality emissions that would result from a 1,000 ADT-generating light industrial land use. At this number of trips, the light industrial land use would generate approximately 0.61 fewer pounds of ROG, 0.74 more pounds of

NO_x, 2.91 fewer pounds of CO, the same number of pounds of SO₂, 0.06 more pounds of PM₁₀, and 0.06 more pounds of PM_{2.5} during the summer months. In winter, the light industrial land use would generate 0.68 fewer pounds of ROG, 0.78 more pounds of NO_x, 0.99 more pounds of CO, the same number of pounds of SO₂, 0.05 more pounds of PM₁₀, and 0.06 more pounds of PM_{2.5} per day.

The changes in air emissions resulting from the 34-trip increase would not cause a significant change in air quality emissions compared to the currently proposed land uses. Furthermore, operational emissions under the future potential light industrial use would remain below the applicable thresholds for criteria pollutants. Therefore, the operational air quality impacts of the 1,000 ADT-generating light industrial land use would not differ from those of the previously proposed land use.

Table 7						
Operational Air Quality Emissions for Maximum 1,000 ADT Site Use (121,532 Square Feet of Light Industrial with 1,000 ADT)						
	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	3.95	2.65	27.38	0.06	5.68	1.47
Area	3.62	0.04	5.29	0.00	0.01	0.01
Energy	0.06	1.05	0.88	0.01	0.08	0.08
Total	7.63	3.74	33.54	0.07	5.76	1.56
<i>Change from existing plans</i>	-0.61	+0.74	-2.91	0.00	+0.06	+0.06
<i>Threshold</i>	137	250	550	250	100	67
Winter						
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	3.87	2.91	25.99	0.06	5.68	1.47
Area	2.76	0.00	0.00	0.00	0.00	0.00
Energy	0.06	1.05	0.88	0.01	0.08	0.08
Total	6.68	3.95	26.87	0.07	5.76	1.55
<i>Change from existing plans</i>	-0.68	+0.78	+0.99	0.00	+0.05	+0.06
<i>Threshold</i>	137	250	550	250	100	67

As described in Section II, this addendum includes a conservative assessment using the highest ADT-generating use with the proposed rezone to IL-1-1, reasonably foreseeable potential site use to determine the greatest potential air quality and GHG impacts that could result from the proposed rezoning. A review of potential uses indicated that a maintenance and repair use would be the most foreseeable, highest ADT-generating type of development project. At 0.5 FAR (121,532 square feet), this type of development would generate approximately 2,430 ADT, which would result in 18.09 pounds of ROG, 10.74 pounds of NO_x, 105.96 pounds of CO, 0.24 pounds of SO₂, 20.78 pounds of PM₁₀, and 5.46 pounds of PM_{2.5} per day, as shown in Table 8.

Table 8						
Air Quality Emissions for the Highest ADT-Generating, Reasonably Foreseeable Potential Site Use (121,532 Square Feet of Maintenance and Repair Use)						
	Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer						
Mobile	9.60	6.43	66.50	0.16	13.79	3.58
Area	3.62	0.04	5.29	0.00	0.01	0.01
Energy	0.06	1.05	0.88	0.01	0.08	0.08
Total	13.28	7.52	72.66	0.16	13.88	3.67
<i>Change from existing plans</i>	+5.03	+4.52	+36.21	+0.10	+8.17	+2.16
<i>Threshold</i>	137	250	550	250	100	67
Winter						
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	9.39	7.07	63.14	0.15	13.79	3.58
Area	2.76	0.00	0.00	0.00	0.00	0.00
Energy	0.06	1.05	0.88	0.01	0.08	0.08
Total	12.20	8.11	64.01	0.16	13.87	3.66
<i>Change from existing plans</i>	+4.85	+4.94	+38.13	+0.09	+8.16	+2.16
<i>Threshold</i>	137	250	550	250	100	67

The operation of a maintenance and repair land use would generate more pounds of all six criteria pollutants when compared to the emissions generated by the existing plans. As the OMCP FEIR determined that buildout of the community plan area would result in significant and unavoidable impacts related to criteria pollutant emissions, this impact would be within the scope of the OMCP FEIR as it would not cause a substantial increase in criteria pollutant emissions. Additionally, this future development scenario would be within the significance thresholds of the RAQS and operational emissions under the future potential light industrial use would remain below the applicable thresholds for criteria pollutants.

Sensitive Receptors/Collocation

The project site is adjacent to undeveloped land designated as open space and the placement of an industrial use within the project site could result in air emissions such as ozone, PM₁₀ and PM_{2.5}, CO, NO_x, SO₂, and lead associated with future project operations.

The introduction of an industrial use within the project site could generate toxic air pollutants which could represent a significant adverse air quality impact, specifically related to residential uses and other sensitive receptors located north of the project site. The land immediately adjacent to the north is designated open space and serves as a buffer between potential future industrial uses on-site and sensitive receptors to the north (e.g., existing residential use). However, due to the separation of the site from the residential areas to the north by approximately 190 feet, air quality impacts that could be associated with adjacent land uses are not anticipated.

Future industrial development would be required to adhere to the Air Toxics "Hot Spots" Information and Assessment Act (State Assembly Bill [AB] 2588, 1987), requiring that any new facility proposed that would have the potential to emit toxic air contaminants would be required to assess air toxic problems that could result from their facility's emissions. Additionally, future development would be required to comply with the collocation policies of the General Plan and OMCP. These policies and standards include but are not limited to policies and performance standards for truck circulation and industrial design and adherence to all relevant and mandatory air district, state, and federal controls on toxic air emission sources. As there is existing open space serving as a barrier between the project site and residential uses to the north, a future industrial project would not have impacts related to collocation of residential and industrial development.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Biological Resources

OMCP FEIR

Section 5.4 of the OMCP FEIR provides an analysis of biological resource impacts associated with the OMCP. The OMCP FEIR stated that implementation of the CPU has the potential to impact sensitive plants and animals directly through the loss of habitat or indirectly by placing development adjacent to the MHPA. Potential impacts to federal or state listed species, MSCP covered species, or species with a California Native Plant Society Rare Plant Ranking would be significant. In addition, the OMCP FEIR concluded that future projects would be required to implement a mitigation framework including BIO-1, which requires site-specific biological surveys to determine the potential for sensitive species, along with the provision for the proposal for site-specific mitigation, if necessary, to reduce impacts to sensitive species or habitats. Specifically, BIO-1 requires future projects to conduct a habitat assessment to determine whether or not protocol surveys are needed. Should burrowing owl habitat or sign be encountered on or within 150 meters of the project site, breeding season surveys shall be conducted. If occupancy is determined, site-specific avoidance and mitigation measures shall be developed. Measures to avoid and minimize impacts to burrowing owl shall be included in a Conceptual Burrowing Owl Mitigation Plan, which includes take avoidance (pre-construction) surveys, site surveillance, and the use of buffers, screens, or other measures to minimize construction-related impacts. Implementation of the mitigation framework would ensure that impacts to sensitive plants and animals would be less than significant.

The OMCP FEIR concluded that future development, including construction or extension of CPU Mobility Element roadways, utility lines, and/or temporary construction activities within the MHPA, has the potential to interfere with nesting, reduce foraging habitat, and obstruct wildlife movement as a result of noise, construction activities, habitat loss, and/or fragmentation. Any direct or indirect impacts to migratory wildlife nesting, foraging, and movement was determined to be significant. The OMCP FEIR's mitigation framework includes measure BIO-2, which requires a site-specific biological resource survey for projects that may have a potential to impact to areas within the MHPA. Implementation of this mitigation measure would ensure impacts would be less than significant.

The OMCP FEIR determined that future projects within the CPU area could result in significant impacts to sensitive habitat, specifically to Tier I, II, and IIIB habitat areas, which include maritime succulent scrub, native grassland, Diegan coastal sage scrub, non-native grassland, riparian scrub, vernal pools, and basins with fairy shrimp. Measure BIO-1 would reduce impacts to sensitive habitat to a less than significant level. In addition, compliance with CPU policies and established development standards and regulations would reduce impacts to sensitive habitats to a less than significant level.

The OMCP FEIR identified potential impacts to sensitive vegetation communities and species as a result of MHPA boundary adjustments would be less than significant because any adjustments would be required to meet the equivalency criteria for approval. In addition, MHPA adjacency impacts would be addressed at the project-level, and projects adjacent to MHPA areas would be required to comply with the MHPA Land Use Adjacency Guidelines and implement mitigation measure LU-2, which would reduce MHPA adjacency impacts to a less than significant level. The OMCP FEIR also determined that the CPU would be consistent with the vision for the Otay Mesa MHPA as the open space network would remain intact and the CPU incorporates policies for adhering to the Management Directives, and no significant impacts relating to MSCP consistency would occur.

In regard to invasive plant impacts, the OMCP FEIR stated that impacts could be potentially significant due to the introduction of invasive plants within the MHPA during future grading and development. The OMCP FEIR stated that the introduction of invasive species into the MHPA would be addressed at the project-level and would be mitigated through implementation of the mitigation framework measure LU-2, reducing impacts to a less than significant level.

The OMCP FEIR concluded that future projects implemented in accordance with the CPU may result in significant impacts to wetlands, vernal pools and vernal pool species, as well as both wetland and non-wetland streambed waters regulated by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and the City, and would thus require a deviation from the ESL regulations. The OMCP FEIR determined that future projects implemented in accordance with the CPU which cannot demonstrate compliance with CPIOZ A because impacts to wetlands/jurisdictional resources cannot be avoided would be required to implement mitigation measure BIO-4, which would reduce impacts to wetlands to a less than significant level.

The OMCP FEIR stated that there is a potential for temporary noise impacts to wildlife from construction and permanent noise impacts from the introduction of noise generating land uses adjacent to MHPA. Temporary and/or permanent noise impacts to wildlife within the MHPA would be significant. The OMCP FEIR determined that impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the CPU would be mitigated to a less than significant level with implementation of mitigation measures BIO-1 through BIO-4 and LU-2.

Project

Sensitive Plants and Animals/ Sensitive Habitat

The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project; therefore, no impact to biological resources would occur. However, the project would allow for future development that could result in impacts to sensitive species and sensitive habitat. Pursuant to OMCP FEIR Figure 5.4-1, the land cover type present on the project site is identified as Urban/Developed; however, as shown in OMCP FEIR Figures 5.4-2, 5.4-3, and 5.4.5 the project site is located adjacent to mapped sensitive vegetation communities and designated MHPA, Conserved Lands, and proposed OMCP open space lands. Future projects would be required to show project consistency with MHPA Land Use Consistency Guidelines, and all relevant Otay Mesa Multi-Habitat Planning Area Management Directives relating to any identified sensitive plants and animals.

As described in Section II, projects in the CPIOZ Type A would be required to prepare a biological survey for sites that have not been previously graded or developed. Additional specific avoidance measures could be required if the biological survey results in the identification of burrowing owls or burrowing owl habitat on the project site. If at the time of future development, the site is determined to contain ESL, consistent with Section 143.0110, future discretionary permits may be required to ensure compliance with the ESL regulations. Additionally, future projects may also be required to conduct a habitat assessment to determine whether or not protocol surveys are needed.

Migratory Wildlife

The project site is located approximately 0.2 mile to the south of Dennery Canyon which supports Tier I and Tier II upland habitat, and adjacent to mapped sensitive vegetation communities and designated MHPA, Conserved Lands, and open space lands. The project is a GPA, CPA, and Rezone and no project development or construction activities are proposed; therefore, no impact to migratory wildlife would occur; however, future development, could interfere with nesting birds, reducing foraging habitat, and/or result in obstructing wildlife movement as a result of noise, construction activities, habitat loss and/or fragmentation. Consistent with the CPIOZ Type A, a site-specific biological resources survey is required. This survey would identify the need for applicable protocol surveys, recommendations for measures to be implemented during construction-related activities, identification of the limits of any identified local-scale wildlife corridors or habitat linkages, and include recommendations to minimize or avoid impacts to wildlife movement. Adherence to the CPIOZ Type A biological resource survey requirements would ensure that impacts to wildlife movement, including nesting birds, associated with future development would be identified and reduced to less than significant levels if necessary.

Noise Generation

The project is a GPA, CPA, and Rezone; however, no development is proposed as part of the project. Therefore, impacts to biological resources would not occur; however, future development, could result in temporary construction noise and/or the introduction of permanent noise generators that could adversely impact sensitive species residing in and adjacent to MHPA lands. The project site is not adjacent to MHPA lands, but these lands are approximately 0.3 mile to the northeast and

southwest. Per the CPIOZ Type A requirements, the required biological survey for ungraded, undeveloped land would identify any sensitive species residing or near the site.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Historical Resources

OMCP FEIR

Section 5.5 of the OMCP FEIR provides an analysis of historical resource impacts associated with the CPU. The OMCP FEIR determined that future development would have the potential to significantly impact all or a portion of the previously identified recorded prehistoric or historic sites within the CPU area. The OMCP FEIR stated that future discretionary development projects could result in a potentially significant impact to prehistoric or historic resources and would be required to apply the mitigation framework for historical archaeological resources, including mitigation measures HIST-1 and HIST-2.

The OMCP FEIR determined that future development would have the potential to significantly impact religious or sacred sites within the CPU area. Development proposals requiring discretionary approval would be required to implement the mitigation framework for historical archaeological resources, including mitigation measure HIST-1.

The OMCP FEIR determined that future development would have the potential to significantly impact human remains within the CPU area. The OMCP FEIR stated that future discretionary projects would be required to implement the mitigation framework for historical archaeological resources, including mitigation measure HIST-1.

The OMCP FEIR determined that future development would have the potential to significantly impact built historic resources within the CPU area. The OMCP FEIR stated that future discretionary projects with the potential to impact structures 45 years of age or older would be required to implement the mitigation framework for historical built environment resources, including mitigation measure HIST-2.

Project

The project is a GPA, CPA, and Rezone and no development or construction activities are currently proposed as part of the project; therefore, no potential impact to cultural resources would occur. However, the project would allow for future development, and future development that includes grading and excavation during construction would have the potential to unearth unknown or previously undisturbed archaeological resources, which would be considered a significant impact. Consistent CPIOZ Type A requirements, all projects that would be implemented on ungraded, undeveloped land would be required to conduct an archaeological survey. Adherence to this requirement would maintain consistency with the OMCP FEIR and ensure less than significant impacts.

There are no historic buildings, structures, or objects on the project site. Therefore, OMCP FEIR Mitigation Framework HIST-2 would not apply.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Health and Safety/Hazardous Materials

OMCP FEIR

Section 5.6 of the OMCP FEIR provides an analysis of health and safety/hazardous materials impacts associated with the CPU. The OMCP FEIR identified impacts associated with wildfire hazards that would be potentially significant because new development in the wildland interface areas may expose people and structures to wildland fire hazards, representing a potentially significant impact at the program level. The OMCP FEIR included a mitigation framework with measure HAZ-1, which would reduce potential wildfire hazard impacts to a less than significant level. In addition, the OMCP FEIR determined that impacts associated with aircraft hazards would be potentially significant at the program level, as future projects developed in accordance with the CPU have the potential to conflict with FAA requirements and result in a significant aircraft hazards impact. The mitigation framework contained in the OMCP FEIR included mitigation measure HAZ-2, which would reduce potential aircraft hazard impacts to a less than significant level.

The OMCP FEIR concluded that impacts associated with hazardous substances would be less than significant, as future projects within the CPU area would be required to comply with policies contained in the General Plan, the CPU, and regulations imposed by federal, state, and local agencies, including the U.S. Environmental Protection Agency, Resource Conservation and Recovery Act, California Department of Health Services, County of San Diego Department of Environmental Health, and the California Department of Transportation. In addition, the CPU designated truck routes within the CPU area along roadway improvements in conjunction with buildout of the circulation network, which would reduce the potential risk of exposure from hazardous materials to residents as a result of transporting hazardous materials. Compliance with existing regulations would ensure impacts associated with health hazards and hazardous substances remain less than significant.

The OMCP FEIR determined that impacts associated with hazardous sites would be potentially significant, as the Program EIR identified six sites within the CPU area as containing hazardous materials, which would present a significant hazard to the public or the environment. In addition, the presence of unknown hazardous sites within the CPU could result in significant impacts to future development within the CPU area. The mitigation framework contained in the OMCP FEIR included mitigation measure HAZ-3, which would reduce potential hazardous site impacts to a less than significant level.

Project

Wildfire Hazards/ Emergency Response

The project site is located within a designated Very High Fire Hazard Severity Zone and although there is industrial development adjacent to the southern boundary of the site, it is surrounded by open land with vegetated slopes. The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with wildfire would not occur; however, the project would allow for future development. If future development is not designed safely could result in a significant wildfire impact. Future development would require adherence to Section 145.0701 through 145.0711 of the Land Development Code (LDC), California Fire Code, and the City's Brush Management Regulations to ensure the protection of people and structures from potential wildland fire hazards. Wildfire impacts would not vary from those of the adopted OMCP FEIR.

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. A San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, the project is subject to review by the San Diego Fire Department and the San Diego Police Department to ensure compliance with applicable safety standards. The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with implementation of or physical interference with an adopted emergency response or evacuation plan would not occur. The project would allow for future development which could result in temporary construction equipment staging areas which would be restricted to on-site locations, and evacuation controlled by authorities on public roadways would not be impeded by construction operations. Evacuation routes are located south of Exposition Way and Innovative Drive connecting to Otay Mesa Road and Interstate 805 which is 0.7 mile south of the project site. The project site would be directly linked to these evacuation routes via Exposition Way and Innovative Drive. The project site would have adequate emergency access and would not significantly impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Airport Safety Hazards

Review of the Brown Field Municipal Airport ALUCP Safety Compatibility Map (Exhibit 111-2) stated that the project site is located within Airport Influence Area (AIA) Review Area 1 and within Safety Zone 2 (Inner Approach/Departure Zone) and Zone 3 (inner turning zone) (Figures 4 and 5). The project includes a GPA and CPA to redesignate the land use from Medium Residential to Light Industrial and a Rezone to change the zoning from the Residential Medium (RM-2-4) zone to the Light Industrial (IL-1-1) zone. This discretionary action requires ALUC consistency review. Although no development is specifically proposed, future development within the Light Industrial zone could include manufacturing, distribution and storage uses, which are considered compatible within Safety Zone 2 and 3. The proposed rezone or land use plan amendment will require an ALUC review for consistency with the Brown Field Municipal Airport ALUCP.

The LDC additionally regulates land uses within the ALUCOZ. The project site is within the ALUCOZ for Brown Field Airport which identifies supplemental development regulations and requires a compatibility review for new development.

The project site is also located within the FAA Part 77 Notification Area for Brown Field. Future development would be required to comply with Code of Federal Regulations, Title 14, Part 77 regarding Obstruction Evaluations/Airport Airspace analysis. As described in the City of San Diego's Bulletin 520, all project applicants within a Part 77 Notification Area must file a Notice of Proposed Construction or Alteration (Form 7460-1) with the FAA.

Overall, through implementation of ALUC procedures and regulatory compliance, impacts associated with airport safety would be similar to those of the OMCP FEIR.

Hazardous Substances

The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project. The project would allow for future development of the site with light industrial land uses under the proposed land use designation and zone could include, but is not limited to, agricultural equipment repair shops, funeral and mortuary services, distribution facilities, and other light industrial uses that could generate hazardous emissions.

There is a developed residential community 190 feet north of the project site. Construction and operation of future uses within the project site could result in the transport, use, and disposal of hazardous waste. Existing federal, state, and local regulations and procedures pertaining to the handling, storage, and transport of potentially hazardous materials would apply to all future development of the site. Future development of the project site would be required to comply with the collocation policies of the City's General Plan, which are intended to reduce or avoid potential land use incompatibility impacts, including hazardous materials. Additionally, the OMCP includes development policies and design guidelines for residential-industrial interface areas as a means to avoid potential impacts associated with collocation of these uses as it relates to Light Industrial uses, the following policies and design guidelines would be applicable:

- **2.2-4:** Provide adequate buffer uses/distance separation for residential proposals within a quarter mile of industrial uses with hazardous or toxic substances.
- **2.4-4:** Maintain the Light Industrial land use designation for the development of light manufacturing, distribution and storage uses, while providing adequate buffers, such as distance, landscape, berms, walls and other uses, where adjacent to open space, residential development, and educational facilities.
- **4.1-10:** Create a visual and distance separation between the public right-of-way and industrial uses such as auto dismantling, truck transportation terminals, and other uses that create noise, visual, or air quality impacts. Screen building and parking areas by using a combination of setbacks, swales, fencing, and landscape. Encourage buffer areas that use appropriate screening.
- **8.7-5:** Maintain an adequate buffer with transitional uses between land uses that allow sensitive receptors and the truck routes.

There is no school within 0.25 mile from the project site; therefore, future light industrial development would not generate emissions near a school. Through application of regulatory controls and General Plan and OMCP policies associated with future development on the site, impacts associated with handling of hazardous materials would be reduced to less than significant levels.

Hazardous Sites

The project site was not identified on the Department of Toxic Substance Control Cortese List; however, as stated above, the OMCP FEIR identified six sites within the CPU area as containing hazardous material. As shown in Figure 3-1 of the Hazardous Materials Technical Study prepared for the OMCP FEIR (Geocon 2012), the project site is not located in proximity to any of the aforementioned hazardous material sites. The nearest site, the Auto Recycling site at 980 Otay Valley Road, is approximately 0.5 mile to the east. The OMCP includes policies to reduce the risk of health and safety hazards related to hazardous sites:

- **6.11-1:** Implement established remediation protocols to reduce public health risks to negligible levels.
- **6.11-2:** Require documentation of hazardous materials investigation addressing site and building conditions during review of all development projects.

Additionally, any future development project would comply with Section 65962.5 of the California Government Code Section 65962.5, which requires the applicant to determine whether the project site is on any of the lists maintained by the Department of Toxic Substances Control and outlined in Section 65962.5(a)(1-4) of the California Government Code.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Hydrology and Water Quality

OMCP FEIR

Section 5.7 of the OMCP FEIR provides an analysis of hydrology and water quality impacts associated with the CPU. The OMCP FEIR identified impacts associated with runoff that would result in significant direct and indirect impacts due to an increase in impervious surfaces and associated increases in runoff, and the alterations of on- and off-site drainage patterns. Any future development project would need to comply with the City of San Diego's Storm Water Standards Manual.

The OMCP FEIR determined that impacts to natural drainage systems would be potentially significant, as buildout in accordance with the CPU has the potential to result in a substantial change to stream flow velocities and drainage patterns on downstream properties. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, would reduce impacts to natural drainage systems to a less than significant level.

The OMCP FEIR concluded that impacts associated with flow alteration would be potentially significant, as future development within the CPU area would potentially impact the existing course and flow of flood waters due to the presence of floodplains within the CPU area. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-1, which requires regulatory compliance with the Storm Water Standards Manual, and would reduce impacts associated with flow alteration to a less than significant level.

The OMCP FEIR determined that impacts to water quality would be potentially significant, as future projects constructed during buildout of the CPU could result in discharges to surface water or groundwater. Grading and exposed soil could result in sedimentation. Residential development could result in the discharge of sediment, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Commercial development could result in discharge of sediment, nutrients, organic compounds, oxygen-demanding substances, pesticides, and bacteria and viruses. Projects would be required to prepare a Storm Water Pollution Prevention Plan. Development of parks, schools, roads, and other public infrastructure would contribute to any of the identified pollutants noted above. The OMCP FEIR mitigation framework included mitigation measure HYD/WQ-2 would reduce impacts associated with water quality to a less than significant level.

Project

The project is a GPA, CPA and Rezone and no development is currently proposed as part of the project. Therefore, no hydrological or water quality impacts would occur as a result of this project. However, the project would allow for future development of the project site which could result in impacts related to hydrology such as increased storm water runoff, changes to the site's natural drainage systems, and on- and off-site flow alteration due to changes to conditions associated with construction and future operation.

Stormwater Runoff

The project site is currently vacant and undeveloped. Future development of the project site would result in the construction of impervious surfaces which could increase the amount and rate of on-site runoff and result in an alteration to drainage patterns. Future development would be required to adhere to applicable regulations, policies and planning guidance related to storm water runoff. Specifically, the OMCP contains policies related to the goal of providing a reliable system of storm water facilities to serve the existing and future needs of the community. Specifically, Public Facilities, Services, and Safety Element Policies 6.3-1, 6.3-2, and 6.3-3 implement this goal through the requirement that future projects use sustainable infrastructure design to capture and control runoff using Drainage Design Standards, encouraging the use of low impact development (LID) design to exceed regulations set forth in the Storm Water Standards, and improving surface and/or subsurface drainage facilities in conjunction with private development projects (City of San Diego 2014).

According to the City's Storm Water Requirements Applicability Checklist, future development would be a Priority Development Project and a Storm Water Quality Maintenance Plan (SWQMP) would be required to identify and implement the required structural Best Management Practices (BMPs) and

LIDs for storm water pollutant control. Implementation of the design measures included in the project-specific SWQMP would ensure that runoff volumes and rates are maintained. Future projects also would conform to the City's Stormwater Management and Discharge Control regulations (San Diego Municipal Code [SDMC] Section 43.0301, et seq.) of the LDC which requires that the existing flows of a property proposed for development, be maintained to ensure that the existing structures and systems handling the flows are sufficient. Adherence to the Municipal Storm Water Permit likewise requires implementation of BMPs during construction of future projects. The requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which include installation of LID practices such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would maintain or improve surface runoff.

Future development of the project site would be required to be sited and designed to minimize impacts related to absorption rates, drainage patterns, surface runoff rates, and floodwaters in accordance with current City and Regional Water Quality Control Board (RWQCB) regulations. Adherence to storm water regulations would ensure that impacts associated with runoff and pollutant discharge would be reduced to less than significant levels.

Drainage and Flooding

There are no FEMA flood zones within or in proximity of the project site; however, future development within the project site could result in alterations to natural drainage flows and velocities causing downstream flooding. The OMCP requires future projects to consider hydromodification standards and prepare project specific drainage studies to address and ensure there would be no disruption to detrimental change to natural water flows. Compliance with the current RWQCB regulations would also serve to ensure that impacts related to drainage would be less than significant and would not vary from those identified in the OMCP FEIR.

Water Quality

Future development of the site could result in increases in pollutant discharges including downstream sedimentation. Specifically, as described in the OMCP FEIR, industrial operations are known to be a source of heavy metals, oily wastes, and various other substances dependent on the specific industrial operation. Based on Standard Industrial Code and storm water exposure, industrial facilities would be subject to the General Industrial Storm Water Permit and are required to prepare a stormwater pollution prevention plan (SWPPP). Additionally, future development of the project site would be required to implement stormwater improvements and water quality protection measures to prevent erosion, siltation, and transport of urban pollutants impacting surface or groundwater resources. Specifically, all future development would be required to adhere to the City's Storm Water Runoff and Drainage regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agency (e.g., RWQCB) regulations. Furthermore, all future development projects would be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Stormwater Standards Manual, RWQCB, and SDMC compliance. Adherence to local and regional regulations would ensure that impacts associated with water quality would be less than significant levels and consistent with the OMCP FEIR.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Geology/Soils

OMCP FEIR

Section 5.8 of the OMCP FEIR provides an analysis of geology and soils impacts associated with the CPU. The Program EIR determined that the CPU is within a moderate to high geologic risk area and could therefore result in the exposure of persons or structures to seismic events associated with fault. Faults within the immediate CPU area are generally considered to comprise the La Nación Fault Zone. Faults in this zone are considered to be potentially active and would subject the CPU area to moderate to severe ground shaking, resulting in a potentially significant impact. Regarding compressible soils, the OMCP FEIR determined that portions of the CPU area are underlain by undocumented fill, colluvium/topsoil, and alluvium, which are typically loose, dry and contain rubble and are considered compressible. For future projects underlain by compressible soils, removal and replacement by compacted fill would be required. In regard to expansive soils, the OMCP FEIR determined that the CPU area contains clay mudstone strata within the Very Old Paralic Deposits that exhibit a high to very high expansion potential, which occur over the majority of the CPU area, resulting in a potentially significant impact. No significant impacts were identified for potential rockfall hazards, and no rock stabilization or blasting would be required for future projects within the CPU area. The OMCP FEIR mitigation framework included mitigation measure GEO-1, which requires preparation of a site-specific geotechnical report recommending project-specific engineering design measures which would reduce potential geologic hazard impacts to a less than significant level.

The OMCP FEIR determined that impacts associated with erosion would be potentially significant, due to the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the CPU area, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys. The OMCP FEIR mitigation framework included mitigation measure GEO-2, which requires preparation of a site-specific geotechnical report to ensure that projects adhere to the Grading Regulation and National Pollutant Discharge Elimination System permit requirements. Implementation of this measure would reduce impacts associated with erosion to a less than significant level.

Project

Geologic Hazards

The project site is in a nominal to low geotechnical and relative risk area and is outside of the La Nacion Fault. The project is a GPA, CPA, and Rezone and no development is currently proposed as part of the project. Therefore, impacts to geology and soils would not occur as a result of this project; however, the project would allow for future development of the site, which could result in geological hazards related to unstable soil conditions, landslides, seismicity (faults), and expansive soils. To ensure the structural integrity of all future buildings and structures, future development would be required to conform all SDMC regulations including preparation of a site-specific soils

compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Future development would also include all seismic protection requirements contained within the California Building Code. Future development projects would need to demonstrate adherence to the City's Seismic Safety Study, the Grading Guidelines of the City's Land Development Code, and the California Building Code. The recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines, as well as compliance with the aforementioned regulations, would reduce impacts related to geologic hazards to a level less than significant.

Erosion

Future development of the project site could result in exposure of soils (during construction) and soil erosion leading to downstream sedimentation which could impact nearby drainages and stream valleys. Any future development project would be required to adhere to the City's grading regulations and National Pollutant Discharge Elimination System permit requirements. Additionally, a site-specific geotechnical report would be prepared in accordance with Section 145.1803 of the SDMC and would include design specifications based on future project-level grading. Future site plans shall incorporate design measures to minimize potential geologic hazards and seismic conditions identified in the Geotechnical Investigation. Conformance to mandated City grading requirements would ensure that impacts associated with soil erosion would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Energy Conservation

OMCP FEIR

Section 5.9 of the OMCP FEIR provides an analysis of energy conservation impacts associated with the CPU. The OMCP FEIR concluded that impacts associated with energy conservation would be less than significant, as implementation of the CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the CPU. In addition, the OMCP FEIR concluded that implementation of the CPU would not be anticipated to result in a need for new electrical systems or require substantial alteration of existing utilities, which would create physical impacts. Based on the program-level analysis of the CPU, state and local mandates for energy conservation, and the energy reduction measures set forth in the CPU policies. Impacts associated with energy use would be less than significant.

Project

No construction is proposed as part of this GPA/CPA and Rezone project; however, the project would allow for future development. Energy use during construction of any future development would occur within two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. Future construction would adhere to Policy 4.9-2 of the OMCP Urban Design Element

which encourages new development to incorporate environmentally conscious building practices and materials and use recycled and reused construction materials. Additionally, in compliance with the City's Construction and Demolition Debris Deposit Ordinance, future development would be required to develop waste management plans targeting at least 65 percent waste reduction. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical equipment fuel consumption rates. Therefore, future project construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Future development of the project site would be required to meet the mandatory energy standards of the current California Energy Code as well as the OMCP Urban Design Element, which contains a list of climate change and sustainable development policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design. Additionally, the project would be required to comply with SDMC regulations requiring project consistency with the City's Climate Action Plan (CAP). Through regulatory measures, future development would not result in excessive energy use during the construction or operation and impacts would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Noise

OMCP FEIR

Section 5.10 of the OMCP FEIR provides an analysis of noise impacts associated with the CPU. The OMCP FEIR determined that impacts associated with traffic noise would be significant, as noise sensitive land uses are proposed in areas where exterior noise levels would exceed the noise and land use compatibility standards established in Table NE-3 of the General Plan. Exterior and potentially interior traffic noise impacts are anticipated at the majority of locations adjacent to Interstate 805, State Route (SR-) 905, SR-125, Otay Mesa Road, and Airway Road. The OMCP FEIR mitigation framework included mitigation measures NOI-1 and NOI-2 that would require future projects to demonstrate the exterior and interior noise levels for residential uses would not exceed the compatibility standards of the City's General Plan. These measures required site-specific exterior and interior noise analyses to identify site-specific noise attenuating measures; however, even with implementation of these measures, the OMCP FEIR determined that traffic noise resulting from implementation of the CPU would not be compatible with the General Plan standards.

The OMCP FEIR determined that impacts associated with stationary source noise would be significant, as the CPU has the potential to site noise-sensitive uses (i.e., residential) adjacent to noise-generating commercial and industrial uses. The OMCP FEIR mitigation framework included mitigation measure NOI-3, which requires preparation and submittal of a site-specific acoustical/noise analysis to recommend site-specific noise attenuation measures; however, even with implementation of this measure, the OMCP FEIR determined that impacts would remain significant and unavoidable at the program level.

The OMCP FEIR determined that impacts associated with airport noise would be less than significant, as existing uses within the 60 and 65 community noise equivalent level (CNEL) noise contours from Brown Field would be considered conditionally compatible with these noise levels from operations as Brown Field and General Abelardo L. Rodríguez International Airport in Tijuana, Mexico.

The OMCP FEIR determined that impacts associated with construction noise would be potentially significant, as construction activities related to implementation of the CPU would generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. In addition, construction-related noise associated with future development projects within the CPU area could result in short-term, temporary noise impacts affecting coastal California gnatcatchers, raptors, and other sensitive species within the MHPA. In order to reduce potentially significant impacts associated with construction noise, the OMCP FEIR mitigation framework included mitigation measures NOI-4 (and LU-2) requiring the implementation of best construction management practices, including preparation of a project-specific Construction Noise Management Plan; however, impacts were determined to remain significant and unavoidable.

Project

Traffic Generated Noise

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with traffic related noise would not occur because of this project. However, the project would allow for future development, which could result in an increase in the existing ambient noise levels due to increased vehicular traffic. Future development would be required to meet the City's noise requirements as laid out in Chapter 5, Article 9.5, of the San Diego Municipal Code.

Even with adherence to these regulations, the OMCP FEIR determined that traffic-generated noise impacts would remain significant and unavoidable at the program level. Although these measures would be implemented at a project-level to traffic noise levels, impacts could remain significant and unavoidable, consistent with the OMCP FEIR.

Stationary Source Noise (Collocation)

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with increased stationary source noise levels would not occur as a result of this project. However, the project would allow for future industrial development. Existing uses in the vicinity of the project site are light to heavy commercial and light to heavy industrial uses. The nearest residential use is approximately 0.04 mile to the north and is separated from the site by intervening topography. The parcel immediately adjacent to the project site to the north is undeveloped open space. Just north of the open space are existing residential uses. While the open space provides a buffer, future development of the project site could potentially result in exposure of people to noise levels which exceed City standards due to collocation of industrial and residential uses. Future development would be required to ensure compliance with City noise policies and regulations as contained in the General Plan and Noise Abatement and Control Ordinance, including those that require noise studies for land uses proposed for potentially

incompatible locations, limits on hours of operation for various noise generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. Additionally, the OMCP includes policies to reduce noise impacts. Such policies include requiring site design considerations and other measures to reduce noise levels from these noise generating uses where an interface with noise sensitive land uses occurs. For example, during the site design for a future light industrial use, noise generating aspects of the project would need to be located away from the open space zoned parcel. Buildings and walls could be designed to provide noise attenuation to increase compatibility between uses.

The Noise Element of the General Plan and OMCP anticipated noise sensitive land uses, such as residential, would be located in proximity to noise generating land uses, such as industrial land uses. Although no development is proposed at this time, should a future industrial use be proposed on the project site, it would be subject to the Noise Element of the General Plan which includes specific policies pertaining to compatible land uses. Additionally, future development would be subject to OMCP Noise Element policies for noise attenuation pertaining to new uses that would help protect people living and working in the OMCP area, especially within areas of residential-industrial interface. The residential-industrial interface would allow for the collocation of noise sensitive uses (i.e., residential) adjacent to noise generating commercial and industrial uses providing adherence to the following policies:

- **NE-A.1:** Separate excessive noise-generating uses from residential and other noise sensitive land uses with a sufficient spatial buffer of less sensitive uses.
- **NE-A.2:** Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
- **NE-A.5:** Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.
- **NE-B.1:** Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.

However, even with implementation of these policies, the OMCP FEIR determined that stationary source noise impacts would remain significant and unavoidable at the program level. Although these policies would be implemented at a project-level to reduce on-site stationary source noise levels, impacts could remain significant and unavoidable, consistent with the OMCP FEIR.

Airport Noise

The project site is located within the inner approach/departure zone (Safety Zone 2) and inner turning zone (Safety Zone 3) of Brown Field Municipal Airport and is within the Airport Influence Area, which permits office, commercial, service, transportation, communication, utilities, industrial, manufacturing, and warehouse land uses. Based on the Brown Field Noise Compatibility Criteria (see OMCP FEIR Table 5.1-3), these type of land uses are compatible with exterior noise levels up to 75 CNEL and conditionally compatible depending on land use so long as interior noise levels can be attenuated to 50 CNEL. Future projects must demonstrate compliance with Table III-1 of the Brown

Field ALUCP, which has standards for maintaining interior noise levels within the Brown Field Airport's CNEL contours. Airport noise contours were created for the OMCP FEIR. As shown in Figure 5.10-2 of the OMCP FEIR, the project site is located within the 65-70 dBA CNEL noise contour. The Brown Field noise contour, shown on Figure 6 also shows the site is within a 65 to 70 decibel airport noise contour. Therefore, future development of industrial uses within the project site would be compatible with operations at Brown Field and impacts associated with airport noise would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Paleontological Resources

OMCP FEIR

Section 5.11 of the OMCP FEIR provides an analysis of paleontological resource impacts associated with the CPU, which concludes that impacts to paleontological resources would be potentially significant, as approximately 352 acres designated as high paleontological sensitivity, approximately 1,505 acres designated as moderate sensitivity, and less than 1 acre designated as low sensitivity would potentially be impacted by buildout of the CPU. As such, CPU implementation would result in grading that would impact paleontological resources. Future development subject to discretionary review would require implementation of PALEO-1, which would require project-level analysis and construction monitoring. Implementation of this measure would reduce impacts to paleontological resources to a less than significant level.

Project

The project site is located within the Otay Formation and is assigned with a high paleontological resources sensitivity, because of its potential for impacts to significant fossils. The project is a GPA/CPA and Rezone and no development or construction activities are currently proposed as part of the project. Therefore, impacts to paleontological resources would not occur as a result of this project; however, future ground disturbing activities within the site could result in impacts to paleontological resources. Consistent with the requirements of the CPIOZ Type A, future development would be required to prepare paleontological survey since the site has not been previously graded or developed to determine the presence of paleontological resources on-site. This would identify the potential for ground disturbing activities to impact paleontological resources and what measures would be required to avoid or minimize impacts, ensuring potential impacts to paleontological resources would be less than significant. .

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Transportation/Circulation

OMCP FEIR

Section 5.12 of the OMCP FEIR provides an analysis of transportation/circulation impacts associated with the CPU. The OMCP FEIR determined that level of service impacts associated with capacity of the circulation system would be significant. Specifically, a total of 24 roadway segments under the Horizon Year Plus CPU condition would be expected to operate at an unacceptable level of service, resulting in significant roadway segment impacts. A total of 49 intersections would be expected to operate at unacceptable levels under the Horizon Year Plus CPU condition, resulting in significant intersection impacts, and 39 intersections would remain significant after mitigation. The OMCP FEIR determined that all Interstate 805 freeway segments studied would be expected to operate at an acceptable level of service in the Horizon Year Plus CPU condition, while five SR-905 freeway segments would be expected to operate at unacceptable levels in the Horizon Year Plus CPU condition, resulting in a significant impact at these five SR-905 freeway segments. In regard to metered freeway ramp locations, the OMCP FEIR determined that five SR-905 metered freeway on-ramps, would be expected to experience delays over 15 minutes with downstream freeway operations at unacceptable levels in the Horizon Year Plus CPU condition, resulting in a significant impact.

The OMCP FEIR mitigation framework stated that at the program level, impacts would be reduced through the CPU proposed classifications of roadways and identification of necessary roadway, intersection, and freeway improvements. Specific mitigation measures or construction of these improvements would be carried out at the project-level via the City's PFFP and/or specific improvement proposals included as part of future development projects. Funding would be through construction by individual development projects, collection of Facilities Benefit Assessment fees, fair-share contributions to be determined at the project-level, and potentially other sources.

The OMCP FEIR identified significant impacts at roadway segments throughout the CPU area, including Exposition Way/Vista Santo Domingo between Avenida de las Vistas and Corporate Center Drive, which is expected to operate at LOS F. Even with incorporation of the recommended street classifications identified in Table 5.12-4 of the OMCP FEIR, 24 roadway segments would operate unacceptably in the Horizon Year Plus CPU condition, resulting in significant and unmitigated impacts to roadway segments. The OMCP FEIR mitigation framework stated that partial mitigation may be possible in the form of transportation demand management measures that encourage carpooling and other alternate means of transportation. At the time future discretionary subsequent development projects are proposed, project-specific traffic analyses would be required to contain detailed recommendations.

The OMCP FEIR identified significant impacts at 49 intersections throughout the CPU area. Of these intersections, the following are within the vicinity of the Exposition Way project: Otay Mesa Road/Corporate Center Drive; Otay Mesa Road/Innovative Drive; Heritage Road/Otay Valley Road. The OMCP FEIR mitigation framework included mitigation measure TRF-1, which requires intersection improvements per the lane designations identified in the OMCP FEIR Figures 5.12-4a through 5.12-4g. However, the OMCP FEIR concludes that even with the lane configurations proposed for the intersections analyzed, intersection operations would continue to be significant and unmitigated.

The OMCP FEIR proposed mitigations for freeway segment impacts include the construction of high-occupancy vehicle lane in each direction on the SR-905. However, because the affected freeway segments are owned and operated by California Department of Transportation, mitigation to these segments cannot be guaranteed by the City. Therefore, additional mitigation such as transportation demand management measures may be identified in the future at the project-level; however, impacts to the SR-905 mainline segments would remain significant and unmitigated.

At the time future development projects are proposed, project-specific traffic analyses would be required to contain detailed recommendations. All project-specific mitigation for direct impacts shall be implemented prior to the issuance of Certificate of Occupancy in order to provide mitigation at the time of impact; however, at the program level impacts would remain significant and unmitigated.

Project

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with transportation and circulation would not occur as a result of this action; however, the project would allow for future industrial development and any future development within the project site could result in transportation impacts. Although a development is not proposed as part of the current project, the proposed land use actions could allow for the future construction of up to a maximum 121,532-square-foot building, which is the maximum potential building size based on the parcel size of 5.58 acres and a maximum FAR of 0.5. Future development would be subject to the CPIOZ Type A supplemental regulations, detailed in Section I, which would limit projects to those that would generate no more than 1,000 ADT. Any proposed use that would generate 1,000 ADT or more would be subject to a subsequent environmental review, consistent with the CPIOZ Type B.

The previously proposed 161-unit residential project would have generated approximately 966 ADT, which is 33 fewer trips than the potential maximum allowed by the CPIOZ Type A (999 ADT). The proposed rezone could allow for a future project that would be subject to the CPIOZ Type A supplemental regulations, and future development would be limited to generating less than 1,000 ADT because the CPIOZ Type A requires a City-certified traffic engineer to provide a statement that the potential future project would not generate 1,000 ADT or more. A difference of 33 ADT between the OMCP FEIR and a potential future development project would not result in a significant traffic impact.

Additionally, the project would not affect the ability of the OMCP mobility network to be constructed as planned. Future development projects would be required to construct any abutting streets to the classification identified in the Mobility Element of the OMCP. Thus, any future development projects would be consistent with the surrounding mobility network and City mobility policies. Implementation of the proposed GPA/CPA and Rezone would not affect the feasibility of ultimately connecting Exposition Way with Santo Domingo Road, as identified in the OMCP.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Public Services and Recreation

OMCP FEIR

Section 5.13 of the OMCP FEIR provides an analysis of public service impacts associated with the CPU. The OMCP FEIR stated that buildout of the CPU would increase demand for fire protection services and would contribute to the need for new or altered facilities. The CPU anticipated construction of a planned 10,500-square-foot fire station (Fire Station No. 49) in addition to a 10,500-square-foot fire station to be collocated with the police facilities near Britannia Boulevard and Airway Road to ensure the department meets established response times, within the CPU area. The construction of new facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at the program-level of analysis conducted for the OMCP FEIR, impacts related to the construction of fire protection facilities were determined to be less than significant.

The OMCP FEIR stated that buildout of the CPU would result in additional demand for police service in Beat 713. As discussed in the OMCP FEIR, the average response times for Beat 713 exceed both the citywide average and police department goals for Emergency, Priority One, and Priority Two calls. Police response times would continue to increase with the buildout of CPU and the increase of traffic generated by new growth, requiring construction of new facilities. The OMCP FEIR stated that construction of new facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, it was determined that, at the program-level analysis, impacts related to the construction of new police protection facilities would be less than significant.

The OMCP FEIR stated that buildout of the proposed CPU would place additional demands on school services and additional facilities would be required to meet the needs of the CPU buildout. As discussed in the OMCP FEIR, the construction of these facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. The OMCP FEIR determined that payment of the statutory fee, pursuant to Senate Bill 50, by future projects consistent with CPU would mitigate the impact because of the provision that the statutory fees constitute full and complete mitigation. Impacts were determined to be less than significant.

The OMCP FEIR identified that new parks would be required in the CPU area in order to meet the increased demand associated with buildout of the proposed CPU. Under the CPU, approximately 2,909 acres would be designated for parks and open space. Of this, 161 acres were designated for population-based parks. The remaining 2,748 acres would consist of open space. The construction of additional park facilities is specifically indicated in the PFFP for the CPU; and the OMCP FEIR stated that it is reasonable to assume that these facilities would be constructed in the future. The construction of these facilities would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, at this program level of analysis, the OMCP FEIR determined that impacts related to the construction of new park and recreation facilities within the CPU area would be less than significant.

The OMCP FEIR stated that there would be a need for an additional library facility to serve the CPU area upon buildout. The OMCP FEIR stated that the construction of a new facility was specifically contemplated by the current PFFP for the CPU, and that it is reasonable to assume that this facility would be constructed in the future. The construction of this facility would take place within the development footprint of the CPU and would be subject to separate environmental review at the time design plans are available. Therefore, the OMCP FEIR determined that at the program level of analysis, impacts related to the need for construction of a new library within the CPU area would be less than significant.

Project

The project is a GPA/CPA and Rezone project and no development is currently proposed as part of the project. Therefore, impacts associated with public services and recreation would not occur as a result of this project; however, the project would allow for future industrial development, which could increase demands on public services and recreation.

Although no specific development plan is known at this time, the proposed changes in land use designation and zoning would allow light industrial uses within the project site. Development of a light industrial land use would not affect schools, parks, libraries, or recreational facilities; however, the construction of up to 121,532.4 square feet of new industrial uses could increase the need for police and fire protection services. Future development would be required to adhere to General Plan and OMCP policies that require development to ensure adequate facilities are available at the time of development to serve the project. Additionally, Development Impact Fees (DIFs) would be required to be paid prior to building permit issuance for use to maintain, as well as fund, future facilities. Therefore, through compliance with City policies and payment to the DIF, impacts associated with police and fire protection services would be reduced to less than significant levels.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Public Utilities

OMCP FEIR

Section 5.14 of the OMCP FEIR provides an analysis of utility system impacts associated with the CPU.

The OMCP FEIR concluded that impacts associated with water and reclaimed water utility systems would be less than significant. Improvements to these systems had been previously identified in master planning documents, including Otay Water District's (OWD) 2008 Water Resources Master Plan and 2010 Water Resources Master Plan Update and the City's Public Utilities Department (PUD) Otay Mesa Master Plan Optimization Baseline Report, and would be required regardless of whether the CPU was implemented. As it pertains to wastewater utility systems, the OMCP FEIR determined that impacts would be less than significant, as the 2004 Otay Mesa Trunk Sewer Master Plan and 2009 Refinement Report previously identified sewer system improvements as required in future phases to accommodate buildout wastewater generation from the area. The three additional

improvements identified within the CPU would occur within existing utility line easements and facilities and would not result in significant impacts to the environment.

Impacts associated with storm water infrastructure were concluded to be less than significant, as no storm drains, or other community-wide drainage facilities are proposed for construction in conjunction with adoption of the CPU. All such facilities would be constructed in conjunction with future development projects implemented in accordance with the CPU, designed to the satisfaction of the City Engineer. At the project-level, adherence to existing storm water regulations, conformance with General Plan and CPU policies, and review under CEQA would assure that impacts associated with the requirements for and/or construction of storm water infrastructure would be less than significant at the program-level.

With respect to solid waste, the OMCP FEIR concluded that buildout under the CPU would significantly impact landfill capacity. Future development would be required to submit a Waste Management Plan (WMP) ensuring project-specific conformance to solid waste reduction measures and compliance with recycling programs. Implementation of this measure would reduce impacts to public facilities to a less than significant level.

Communication systems impacts were identified as less than significant, as cable and telephone services would be available through private utility companies that have capacity to serve the CPU area. In addition, the OMCP FEIR determined that short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the CPU would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way.

Project

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with public utilities would not occur as a result of this project; however, the project would allow for future industrial development, which could increase demands on existing public utilities requiring new or expanded facilities which could result in a significant impact.

Water/Sewer/Reclaimed Water

No development is proposed at this time. However, at the time future development is proposed, the site would be serviced by the City's PUD and the OWD. The Otay Mesa service area was evaluated in the Otay Mesa Master Plan Optimization Baseline Report which was relied upon in the OMCP FEIR to address areas of identified utility improvements. No specific improvements were identified for the project site or vicinity (see OMCP FEIR Figures 5.14-1 and 5.14-2). However, as future development is proposed, the availability of services and required improvements would be evaluated. Any improvements required to be constructed to serve development at the site would be evaluated as part of the overall project to ensure physical impacts are addressed. Additionally, future development would be required to adhere to General Plan and OMCP policies requiring the coordination of project-specific improvements to ensure adequate facilities are available at the time of development to serve the project. Through regulatory compliance, impacts relating to water, sewer, and reclaimed water facility improvements would be reduced to less than significant levels.

Solid Waste

No development is proposed at this time. However, future development would be required to comply with City ordinances focused on waste reduction, recycling, and storage. Additionally, future development would be required to adhere to General Plan and OMCP policies relating to waste recycling and diversion of materials. Specifically, the OMCP includes Public Facilities, Services and Safety Element Policies 6.5-1 through 6.5-5, which promote the planning for sufficient waste handling and disposal capacity to meet future needs, encourage future projects to divert construction and demolition debris beyond the 50 percent required by the City's C&D Ordinance, and require sufficient storage space for recycling containers in all new residential, commercial, and industrial development.

Furthermore, since adoption of the OMCP FEIR, additional state mandates have been implemented to require additional diversion of organic waste. Future development would be required to demonstrate consistency with current solid waste regulations, which would ensure that impacts to waste management would be reduced to less than significant levels.

Stormwater Facilities

At the time a future development is proposed, the need for stormwater facilities would be evaluated as part of the project drainage and water quality analysis (see the discussion under the Hydrology and Water Quality section). All improvements would be included as part of the overall impact analysis to minimize adverse physical impacts associated with construction of stormwater facilities. Like the OMCP FEIR, physical impacts associated with construction of storm water infrastructure would be less than significant based on required review of necessary facilities by the City Engineer, adherence to existing storm water regulations, conformance with General Plan and OMCP policies, and required review under CEQA.

Communication Systems

Similar to the conclusions made in the OMCP FEIR, there would be no significant impacts related to provision of cable and telephone services, as these are available through private utility companies that have the capacity to serve the OMCP area and any required utility extensions would be evaluated under CEQA. In addition, the City administers an undergrounding program and short-term construction impacts from installation of new communication systems or undergrounding for individual future projects under the OMCP would not result in significant impacts because communication lines would be within existing or planned roadway right-of-way.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Water Supply

OMCP FEIR

Section 5.15 of the OMCP FEIR provides an analysis of water supply impacts associated with the CPU. The OMCP FEIR determined that impacts associated with water supply would be less than significant. The Water Supply Assessment (WSA) prepared for the OMCP FEIR concluded that there is sufficient water supply to serve existing demands, project demands of the CPU, and future water demands within the City PUD and OWD service area in normal and dry year forecasts during a 20-year projection.

The OMCP FEIR concluded that impacts associated with landscape plans would be less than significant, as all future development must conform to existing regulations, as well as the General Plan and CPU policies, which would ensure the use of predominantly drought-resistant landscaping and water conservation for landscape maintenance.

Project

The project is a GPA/CPA and Rezone and no development is currently proposed as part of the project. Therefore, impacts associated with water supply would not occur as a result of this action; however, the project would allow for future industrial development within the project site, which could increase demands on water supply resulting in the use of excessive amounts of potable water, or use of excessive water use for irrigation.

The OMCP FEIR found adequate water supply to support buildout under the plan. The project would change the project site's land use designation from residential to light industrial. The specific water demands for the site cannot be known without a specific development project; however, industrial use generally results in a lower demand on water supply as shown in OMCP FEIR Table 5.15-8 which was part of the OMCP CPU water demand analysis. For comparison, residential use at the project site would generate approximately 48,300 gallons per day (gpd) based on a rate of 300 gpd/unit and 161 units based on previous residential entitlements, while industrial uses would generate approximately 4,982.94 gallons per day (based on a rate of 893 gpd/acre). Therefore, impacts associated with the potable water supply of a future industrial development would be less than significant.

With respect to irrigation of future landscaping, future development would be required to adhere to existing regulations to assure that acceptable plants are selected for landscaping. Additionally, all landscaping and irrigation would be required to comply with the Landscape Standards in the City's LDC, including a maximum applied water allowance. Through adherence to the LDC, and landscape design policies in the General Plan and OMCP, impacts associated with the use of water for irrigation purposes would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Population and Housing

OMCP FEIR

Section 5.16 of the OMCP FEIR provides an analysis of population and housing impacts associated with the CPU. The OMCP FEIR estimated that population buildout under the CPU would increase to approximately 67,035 people by 2050. The OMCP FEIR determined that impacts associated with population growth would be less than significant, as the CPU would implement the San Diego Association of Government's (SANDAG) Regional Comprehensive Plan (RCP) and Regional Housing Element and the City's General Plan and Housing Element by providing a mix of housing types within mixed-use centers linked to public transportation, increase the City's and region's supply of needed housing consistent with SANDAG's regional growth forecast, and focus increased housing supply within compact villages conducive to supporting frequent transit service in accordance with the RCP and General Plan goals and policies. The CPU provides comprehensive planning for the management of population growth and necessary economic expansion to support economic development efforts where none currently exist, resulting in a less than significant impact.

The OMCP FEIR determined that impacts associated with affordable housing would be less than significant, as the land use designations and design guidelines contained in the CPU are intended to foster the development of housing for all income levels. As such, the CPU would provide affordable housing units consistent with federal and state regulations and the City's objective of increasing the stock of affordable housing impacts to affordable housing, resulting in a less than significant impact.

Project

The project proposes GPA and CPA to redesignate the land use from Residential-Medium to Light Industrial and a Rezone from the Residential-Medium (RM-2-4) zone to the Light Industrial (IL-1-1) zone. The project would increase the opportunity for industrial development and would not result in increased density or establish residential development. While the parcel was previously designated for residential use, this use is incompatible with the Brown Field Airport Safety Zones and is therefore undevelopable for residential use. Sufficient residential capacity exists within the OMCP in more appropriate locations considering a number of recently authorized or entitled community plan amendments, refer to Section V for a discussion of additional residential capacity added within the OMCP area. Therefore, changing the designation of the parcel from residential to light industrial would reduce developable housing land; however, the amount of housing land removed (5.58 acres) would not be a substantial loss. Additionally, because of development restrictions associated with the Brown Field Airport ALUCP, residential land uses would be restricted on the project site. Because the majority of the project site is in Safety Compatibility Zone 3, a residential development project on this site would be limited to 16 du/ac or less with conditional approvals by the ALUCP. Residential density at 4 du/ac or less would be allowed without conditional approvals (San Diego County Regional Airport Authority 2010). Impacts associated with population and housing would be less than significant.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Agricultural and Mineral Resources

OMCP FEIR

Section 5.17 of the OMCP FEIR provides an analysis of agricultural and mineral resource impacts associated with the CPU. The OMCP FEIR determined that impacts associated with the conversion of agricultural land would be less than significant. It was determined that although the CPU would convert additional Important Farmland to non-agricultural uses, these areas are fragmented and are surrounded by urban land uses and MHPA lands, and agricultural viability within the CPU area has been significantly reduced due to rising land values, water costs, increasing taxes, habitat management planning, and other land use conflicts. Agricultural land in the CPU area is intended as an interim, rather than permanent, use. The CPU allows agriculture as an interim use pending development and would rezone the Central Village to an agricultural "holding" zone to accommodate continued agricultural operations until such time that a Specific Plan is implemented.

The OMCP FEIR determined that impacts associated with City and regional consequences of agricultural land conversion would be less than significant, as the viability of this area for agricultural use is limited, and the amount of existing farmland is minimal relative to the regional total.

The OMCP FEIR determined that impacts to mineral resources would be less than significant, as portions of the CPU area where Mineral Resource Zone (MRZ) 2 "regionally significant" aggregate resource areas exist are currently developed or where entitlements have already been approved for future development. These existing and planned developments restrict access to these aggregate areas and preclude the ability to extract those resources. Further, the majority of the acreage designated as MRZ-2 contains existing residential uses, which would be incompatible with extraction operations even under the adopted community plan. MRZ-3 mineral resources are not considered a significant mineral resource. As such, the ability to extract mineral resources would not be impacted with the adoption of the CPU.

Project

Agricultural Resources

As shown on Figure 5.17-1 of the OMCP FEIR, the project site is located on land that is designated as Grazing Land as defined by the California Department of Conservation. The project site, however, is not currently in active agricultural use, is fragmented and surrounded by other existing and planned urban land uses and/or land conserved for biological resource protection. Additionally, the project site is not zoned for agricultural use or affected by a Williamson Act Contract. No impacts associated with agricultural resources would occur as a result of future development of the project site.

Mineral Resources

As shown in Figure 5.17-3 of the OMCP FEIR, the project site is situated within a portion of the OMCP area classified as MRZ-3. MRZ-3 is defined as a zone that has been found to contain minerals that are not considered significant mineral resources. The project site is not currently being utilized for mineral extraction and does not contain any known mineral resources that would be of value to the

region. No impacts associated with mineral resources would occur as a result of future development of the project site. Impacts would be less than significant. No mitigation measures would be required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

Greenhouse Gas Emissions

OMCP FEIR

The OMCP FEIR determined that impacts associated with GHG emissions and consistency with adopted plans, policies, and regulations would be significant and unmitigated at the program level if future projects could potentially not meet the necessary reduction goals even with implementation of mitigation framework GHG-1. The CPU contains policies that would reduce GHG emissions from transportation and operational building uses and would be consistent with the strategies of local and state plans, policies, and regulations aimed at reducing GHG emissions from land use and development. Subsequent projects implemented in accordance with the CPU would be required to implement GHG-reducing features beyond those mandated under existing codes and regulations.

The OMCP FEIR identified mitigation framework mitigation measure GHG-2 requiring future projects to demonstrate their avoidance of significant impacts related to long-term operational emissions. However, even with implementation of mitigation, impacts would remain significant and unmitigated as the analysis determined that the 9.1 to 11.4 percent reductions relative to business as usual would fall short of meeting the City's goal of a minimum 28.3 percent reduction in GHG emissions relative to business as usual. While the Mobility, Urban Design, and Conservation elements of the CPU included specific policies that work to minimize GHG emissions, such as requiring dense and compact development, encouraging efficient energy and water conservation design, and increasing transit accessibility, among others, the CPU's projected emissions would fall short of meeting the 28.3 percent reduction goal.

Project

The analysis in this section is based on the greenhouse gas emission modeling found in Attachment A.

Since adoption of the OMCP FEIR, the City has adopted a Climate Action Plan (CAP), and has identified the following question to provide guidance in determining potential significance of impacts related to greenhouse gas emissions:

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

The City's CEQA significance thresholds identify a method to determine significance depending on whether the action requires plan- or policy-level or project-level environmental analysis, as follows:

1. For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the Planning Department has prepared a Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan.
2. For project-level environmental documents, significance is determined through (a) land use consistency and (b) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14.

CAP consistency is determined in two steps. Step 1 involves evaluating whether the project is consistent with the growth projections used in the development of the CAP. A project is consistent with the growth projections used in the CAP if the project can answer yes to any of the three questions below:

- A. Is proposed project is consistent with the existing General Plan and Community Plan land use and zoning designations? or;
- B. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA)? or;
- C. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?

Step 2 of determining CAP consistency is determining if the project is consistent with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that do not comply with the CAP Consistency Regulations must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

GHG Emissions Quantification

The project is a GPA, CPA, and Rezone, and no development is currently proposed as part of the project. Therefore, GHG emissions would not occur as a result of this project; however, the project would allow for future industrial development would result in the emission of GHGs.

The buildout under the existing OMCP would allow for a 161-unit multi-residential housing community, which would result in 1,151.59 metric tons of carbon dioxide equivalent (MT CO₂E) per year (Table 9).

Table 9	
GHG Emissions for Existing Plans (161 Multi-Family Residential Units – 966 ADT)	
Annual	MT CO ₂ E per Year
Mobile	1,015.33
Area	2.00
Energy	72.30
Water	8.62
Waste	37.15
Refrigeration	0.18
Construction	16.00
Total	1,151.59
Construction	MT CO ₂ E per Year
2025	462.41
2026	17.54
Total	479.95
Amortized over 30 Years	16.00

Two future scenarios have been analyzed in this addendum to address future GHG emissions. First, it is assumed that the site would be developed in accordance with CPIOZ Type A, which limits ministerial development approvals to generate less than 1,000 ADT. This would result in a light industrial land use at FAR 0.5 (121,532 square feet). The GHG emissions of this potential development project is shown in Table 10. A future light industrial site use would generate 1,295.16 MT CO₂E per year, which is 143.56 MT CO₂E more than the existing plans would generate.

Table 10 GHG Emissions for the for Maximum 1,000 ADT Site Use (121,532 Square Feet of Light Industrial with 1,000 ADT)	
Annual	MT CO ₂ E per Year
Mobile	934.36
Area	1.78
Energy	250.17
Water	42.42
Waste	47.04
Refrigeration	5.24
Construction	14.14
Total	1,295.16
<i>Increase over Existing Plans</i>	<i>+143.56</i>
Construction	MT CO ₂ E per Year
2025	407.72
2026	16.49
Total	424.21
<i>Increase over Existing Plans</i>	<i>-55.75</i>
Amortized over 30 Years	14.14
<i>Amortized Increase over Existing Plans</i>	<i>-1.86</i>

As described in Section II of this Addendum, a potential for additional GHG emissions could occur if a future discretionary project is approved through consistency analysis with the City's CAP, which does not require a quantification of GHG. For these purposes, a hypothetical "high GHG emission" project has been included in this analysis. This hypothetical project is based on the highest ADT-generating land use that would be allowed in light of zoning restrictions, surrounding land uses, proximity to major roadways, and proximity to the Brown Field Airport. The GHG emissions of this potential development project is shown in Table 11. In this "high GHG emission" scenario, a maintenance and repair use, which generates 20 ADT per 1,000 square feet of building space, or approximately 2,430 ADT, would result in 2,639.49 MT CO₂ per year. This would be 1,478.90 MT CO₂E more than the existing plans would generate.

Table 11 GHG Emissions for the Highest ADT-Generating, Reasonably Foreseeable Potential Site Use (121,532 Square Feet of Maintenance and Repair Use)	
Annual	MT CO2E per Year
Mobile	2,269.69
Area	1.78
Energy	250.17
Water	42.42
Waste	47.04
Refrigeration	5.24
Construction	14.14
Total	2,639.49
<i>Increase over Existing Plans</i>	<i>+1,478.90</i>
Construction	MT CO2E per Year
2025	407.72
2026	16.49
Total	424.21
<i>Increase over Existing Plans</i>	<i>-55.75</i>
Amortized over 30 Years	14.14
<i>Amortized Increase over Existing Plans</i>	<i>-1.86</i>

Both future project scenarios – a 1,000 ADT-generating light industrial land use and a most-intense, reasonably foreseeable maintenance and repair use – would generate more ADT than the previously entitled 161 multi-family dwelling unit development. Impacts under both scenarios would be considered significant and unavoidable, consistent with the OMCP FEIR’s determination for cumulative GHG emissions. However, the additional amount of GHG emissions would not be considered a substantial increase over what was assumed in the OMCP FEIR, because of a number of changes in land use planning and building codes since the adoption of the OMCP that would help reduce GHG emissions for construction and operation.

For example, the State of California has an updated 2022 Climate Change Scoping Plan, and the City has adopted a CAP to align with this new scoping plan that includes more stringent goals and measures than were in place at time of adoption of the OMCP FEIR, including the following:

- The passage of Senate Bill (SB) 100, which requires a more ambitious Renewable Portfolio Standard for 2030;
- Implementation of a more stringent Low Carbon Fuel Standard;
- Passage of SB 596, which requires specific GHG emissions reductions from the cement sector;
- A Zero-Emission Vehicle Executive Order from the Governor’s Office; and
- A Short-Lived Climate Pollutant Strategy.

Additionally, new state regulations have been adopted that support GHG emission reductions, including the following:

- 2022 California Green Building Code [Title 24, Part 6 (Energy Efficiency Standards) and Part 11 (California Green Building Standards) of the California Code of Regulations]
- Executive Order S-3-05, which establishes GHG emission reduction targets for 2010, 2020, and 2050
- Executive Order B-30-15, which establishes an additional 2030 GHG emission target
- AB 1279, which requires the state to achieve net zero GHG emissions as soon as possible, but no later than 2045

Future development would be more energy efficient than compared to a project constructed at the time of adoption of the OMCP FEIR. All new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. GHG emissions associated with electricity use would be eliminated as California decarbonizes the electrical generation infrastructure as committed to by 2045 through SB 100, the 100 percent Clean Energy Act of 2018.

Further, decarbonization of the transportation infrastructure serving land use development will come from shifting the motor vehicle fleet to electronic vehicles (EVs), coupled with a shift to carbon-free electricity to power those vehicles. Land use projects cannot directly control whether and how fast these shifts are implemented, but they can, and do, have an important indirect influence on California's transition to a zero-carbon transportation system. The 2022 CALGreen went into effect on January 1, 2023, and the project would be subject to these requirements, at a minimum. The project would meet the 2022 CALGreen mandatory requirements for EV parking detailed in Table 5.106.5.3.1 of the 2022 California Green Building Standards Code (Title 24, Part 11, CALGreen). Adherence to these CALGreen requirements would be required prior to issuance of building permits.

Project emissions would decline beyond the buildout year of the project due to continued implementation of federal, state, and local reduction measures, such as increased federal and state vehicle efficiency standards, and SDG&E's increased renewable sources of energy in accordance with Renewable Portfolio Standards goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions that would occur post-construction, the project is in line with the GHG reductions needed to achieve the 2045 GHG emission reduction targets identified by AB 1279. Project consistency with these policies that were adopted subsequent to adoption of the OMCP Final EIR would reduce overall GHG emissions compared to previous assumptions.

General Plan and CAP Strategy Consistency

Table 12 provides an overview of the project's consistency with the City of San Diego's CAP policies and the General Plan policies that provide guidance for reducing greenhouse gas emissions.

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
Consistency with General Plan Policies	
<p>General Plan Policy LU-A.7 Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.</p> <ul style="list-style-type: none"> a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community. c. Evaluate the quality of existing and planned transit service. 	<p>Consistent. The project would rezone the project site from RM-2-4 to IL-1-1. No development is proposed at this time, but the allowed industrial intensity (0.5 FAR) would be consistent with the industrial land uses to the south. As described in the OMCP, “a significant number of the industrial establishments in Otay Mesa contribute to the unique border economy and provide critical support to over 700 production-sharing companies located in Baja California (City of San Diego 2014).” This project would contribute to the cohesiveness of the light-to heavy-industrial land uses that surround the Brown Field Regional Airport.</p> <p>The adopted 2021 SANDAG Regional Plan indicates there are existing local bus routes and bike facilities on Otay Mesa Road. Future rapid bus routes are planned for I-905 by 2035 and Airway Road by 2050 (SANDAG 2021). Future employee populations that could result from future development of the project that would have the opportunity to make use of these proposed transportation improvements.</p>
<p>General Plan Policy ME-B.9 Make transit planning an integral component of long-range planning documents and the development review process.</p> <ul style="list-style-type: none"> a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and 	<p>Consistent. The project is a proposed rezoning of the project site from RM-2-4 to IL-1-1. While no development is proposed at this time, the project would not include improvements to the transportation network (e.g., implementation of bike lanes or transit routes). While the project area does not have any identified transit corridors, the Draft 2025 SANDAG Regional Plan identifies a future bike facilities (by 2050) and a rapid bus line (by 2035) along Otay Mesa Road, approximately 3,000 feet south of the project site. Implementing a light-industrial land use in this area would bring employees to the area that could make use of these long-term transportation projects. When a future development project is proposed, the segment of Vista Santo Domingo Road would be constructed from its existing terminus and connect to Exposition Way. This would include an extension</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>stations through the planning and development review process.</p> <p>d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access.</p> <p>e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment.</p> <p>f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.</p>	<p>of the sidewalks along Exposition Way, which would provide pedestrian access to and from the project site.</p>
<p>General Plan Policy CE-J.2 and CE-J.3</p> <p>CE-J.2 Include community street master plans in community plans, prioritize community streets for street tree programs, identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form, integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.</p> <p>CE-J.3 Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.</p>	<p>Consistent. While the proposed rezoning would not include development at this time, the public street, Vista Santo Domingo, would be extended as part of any future development project by the future development project per CPIOZ Type A requirements. As stated in Policy 2.1-2(s) of the OMCP, this street would need to demonstrate consistency with the Otay Mesa Street Tree Plan, which is included as Appendix B of the OMCP (City of San Diego 2014). The Otay Mesa Community Plan Street Tree List provides guidance for types of trees to be planted in different neighborhoods and districts. Street tree planting installations require approval by the City of San Diego’s Urban Forester. All plant materials are required to be consistent with the standards of the Land Development Code Landscape Standards.</p>
Consistency with Climate Action Plan Strategies	
<p>Strategy 1: Decarbonization of the Built Environment <i>This strategy aims to dramatically avoid greenhouse gas emissions from buildings across the City and to improve our indoor air quality. It includes measures to address emissions from existing buildings and municipal facilities and for new development.</i></p>	
<p>Measure 1.1: Decarbonize Existing Buildings</p>	<p>Not applicable. The project does not include existing buildings.</p>
<p>Measure 1.2: Decarbonize New Building Development</p> <p>Develop and adopt a Building Electrification policy, through code update or other</p>	<p>Consistent. The City is responsible for developing EV policies, therefore that component of this measure is not applicable. The project does not include a development proposal at this time. However, any future buildings would be</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>mechanism, requiring new residential and commercial buildings to eliminate the use of natural gas, increase energy efficiency, increase distributed energy generation and storage and increase EV charging stations, engaging with residents of Communities of Concern, workers, and builders</p> <ul style="list-style-type: none"> • Prioritize cool roofs when feasible to implement Climate Resilient SD in energy efficiency building code update. • Support new regional policies for alternative systems that can be used to replace existing heating and cooling air systems and water systems. • Establish policies that incentivize developers to use less GHG intensive materials and practices (EVs, Low-Carbon concrete, recycled materials, etc.) including mass timber and modular construction 	<p>constructed in compliance with state or local green building standards in effect at the time of building construction. While a building electrification policy code update or other reach codes are not currently in effect, all future development would be required to comply with applicable codes in effect at the time of building permits. Electric vehicle charging would be provided consistent with 2022 CALGreen building standards, which went into effect January 1, 2023.</p>
<p>Measure 1.3: Decarbonize City Facilities Supporting Actions</p> <ul style="list-style-type: none"> • Future development on city-owned property will require and reward proposals based on decarbonization and other CAP goals. 2030 Target Phase out 50% of natural gas usage in municipal facilities 2030 GHG Reduction (MT CO2e) 15,148 2035 Target Phase out 100% natural gas usage in municipal facilities 2035 GHG Reduction (MT CO2e) 32,638 • Implement energy efficiency projects at City facilities to meet zero emissions goals for municipal buildings established in the Municipal Energy Strategy & Implementation Plan, prioritizing projects within the City's Communities of Concern. • Implement technologies such as renewable electricity generation, heat pumps, energy storage, and microgrids 	<p>Not applicable. The project does not include the development of City Facilities.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>at City facilities to meet the zero emissions goals for municipal buildings established in the Municipal Energy Strategy & Implementation Plan.</p> <ul style="list-style-type: none"> • Identify and prioritize energy projects at City facilities that increase resiliency for the surrounding communities and City operations, focusing on our Communities of Concern. • Convert all streetlights to LED lights and explore auto-dimming technology where public safety would not be compromised. • Convert all traffic signals to LED lights. Strategy 1 Supporting Actions. • Remove high-Global Warming Potential refrigerants - develop a refrigerant management program that establishes a phaseout timeline for high-Global Warming Potential refrigerants. • Advance workforce development programs for decarbonization including energy efficiency and renewable energy projects. 	
<p>Strategy 2: Access to Clean & Renewable Energy This strategy maintains the City's commitment to 100% renewable energy and now acknowledges that the pathway to achieve this target is through San Diego Community Power. It also sets more ambitious targets for converting the City's fleet of vehicles to electric and for the first time aims to increase the number of electric vehicles used by our communities.</p>	
<p>Measure 2.1: Citywide Renewable Energy Generation</p> <p>Supporting Actions</p> <ul style="list-style-type: none"> • Develop financial support programs to incentivize solar on multifamily buildings, providing financial benefits to tenants and families within Communities of Concern. • Develop financial support programs to incentivize deployment of building scale renewables and mandate the use 	<p>Not applicable. The City is responsible for developing financial support programs; therefore, that component of this measure is not applicable to the project.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>of renewables through building codes, while engaging residents and other stakeholders in the process.</p> <ul style="list-style-type: none"> • Increase renewable generation at non-residential developments through new policies or incentive programs. • Update land use code to include energy storage and other distributed energy technologies to facilitate local renewable energy resource deployment. • Deploy advanced renewable energy technologies (e.g. battery energy storage systems, microgrids, etc.) at municipal facilities to demonstrate feasibility. • Leverage municipal facilities to establish community solar and microgrid solutions when tariffs allow. • Explore partnerships for a trade-in program that makes it possible for small landscape owners to transition to electric equipment 	
<ul style="list-style-type: none"> • Measure 2.2: Increase Municipal Zero Emission Vehicles • Seek partnerships with SDCP, SDG&E and others to install charging infrastructure for all vehicle types. • Include stated preference for 100% renewable energy on public ally available chargers on municipal land. • Update AR 35.80 to include EV vehicles to the list of preferred purchases. • Conduct City fleet electrification study to determine best siting, funding needs, and strategies including specific strategies for the Chollas operations yard. • Update municipal parking yard electric infrastructure to support electric vehicle charging needs. • Create standards for the City's purchase of fuel for fleet vehicles that 	<p>Not applicable. The project is not a municipal project.</p>

Table 12 General Plan and CAP Strategy Consistency Analysis	
Policy Language	Consistency Discussion
<p>contains the lowest levels of lifecycle GHG emissions available.</p> <ul style="list-style-type: none"> Explore pilot projects for a variety of grid resilience services (demand response, emergency back-up, demand charge reduction, etc.) through three modes of EV integration (grid-to-vehicle, vehicle-to-building, vehicle-to-grid). 	
<p>Measure 2.3: Increase Electric Vehicle Adoption</p> <p>Develop a citywide electric vehicle strategy to accelerate EV adoption, including flexible fleets, circulators and electric bicycles, focusing on the barriers to ownership and charging for residents within the Communities of Concern.</p>	<p>Not applicable. The City is responsible for developing EV policies. Nonetheless, it is noted that a future development would provide the necessary EV charging infrastructure to allow for the opportunity to create EV integration in accordance with the 2022 CALGreen building standards, which went into effect January 1, 2023.</p>
<p>Strategy 3: Mobility & Land Use This strategy focuses on emissions from transportation, which account for more than half of all greenhouse gas emissions in San Diego. It also includes actions that support mode shift through mobility and land-use actions and policies.</p>	
<p>Measure 3.1: Safe and Enjoyable Routes for Pedestrians and Cyclists Actions</p> <ul style="list-style-type: none"> Develop Safe Routes to Schools safety plans; start a San Diego Safe Routes to Schools program focusing on Communities of Concern and underperforming schools. Implement the City's Bicycle Master Plan and community plan bicycle networks with a Class IV First approach. Review and improve flexible fleets and micro-mobility policies/shared use mobility programs, especially focused in Communities of Concern and first mile/last mile applications. Partner with micro-mobility operators to optimize the number of scooters available in mobility hubs and/or near transit. 2030 Target 19% walking and 	<p>Consistent. The City is responsible for developing City policies and programs; therefore, those components of this measure are not applicable to the project. The project would not conflict with plans for future high-quality transit in the area as discussed above under the consistency analysis for General Plan Policy ME-B.9.</p> <p>Pedestrians: The project would not conflict with the implementation of future pedestrian network improvements. As discussed under the consistency analysis for General Plan Policy ME-B.9, the extension of Vista Santo Domingo would occur concurrently with a future development project. Along with this roadway improvement and extension by any future development project, non-contiguous sidewalks along Exposition Way would also be extended, which would provide pedestrian access to the project site and connect it to the proposed bike facilities and existing and proposed bus routes along Otay Mesa Road (SANDAG 2024).</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>7% cycling mode share of all San Diego residents' trips 2030 GHG Reduction (MT CO2e) 79,722 2035 Target 25% walking and 10% cycling mode share of all San Diego residents' trips 2035 GHG Reduction (MT CO2e) 115,315</p> <ul style="list-style-type: none"> • Update Bicycle Master Plan with current best practices for facility designation, reflecting recent community plan updates and proposed regional connections. Also describing existing constraints, opportunities, and implementation strategies. • Develop a Mobility Master Plan to reduce mobile sources emissions and further a shift in mode. • The City will evaluate existing and future fee structures to increase the priority of active transportation project implementation, especially within Communities of Concern, and the City will increase its efforts to identify and pursue grant funds for the planning and implementation of active transportation projects. Supporting Actions • Examine proposed bike and pedestrian projects and use "quick-build" pathways where appropriate to increase financial viability. • Increase education campaigns to improve motorist behavior to result in a safer right-of-way for bicyclists and pedestrians. • Include in Bicycle Master Plan update policies and programs to increase bicycle storage near new bikeways. • Where roadway widenings are otherwise planned, identify opportunities to repurpose the use of the right-of-way for walking, rolling, biking, and transit modes of travel. 	

Table 12 General Plan and CAP Strategy Consistency Analysis	
Policy Language	Consistency Discussion
<ul style="list-style-type: none"> Identify and address gaps in the City's pedestrian network and opportunities. 	
<p>Measure 3.2: Increase Safe, Convenient, and Enjoyable Transit Use</p> <p>Actions</p> <ul style="list-style-type: none"> Advocate for a permanent, regional, Youth Opportunity Pass and support the expansion of the program to include college students and residents in Communities of Concern. Create a quick build policy and design guidelines to facilitate repurposing of the right-of-way or installation of interim or pilot transit projects. Develop dedicated bus lanes or shared bus and bike lanes to increase transit efficiency and on-time performance, focusing on routes supporting residents within underserved communities and high-frequency connections for riders going to schools, universities and jobs. 2030 Target 10% transit mode share of all San Diego residents' trips 2030 GHG Reduction (MT CO2e) 162,866 2035 Target 15% transit mode share of all San Diego residents' trips 2035 GHG Reduction (MT CO2e) 234,351 Implement projects and update the Placemaking Ordinance, including a street furniture program that reduces heat exposure, prioritizes natural shade solutions, provides cool transit stops, and improves access to nearby restrooms in high transit use areas and pedestrian corridors, prioritizing Communities of Concern. Ensure every high-volume transit stop has access to transit shelters, which include shade structures and benches; work with MTS to establish standard for the provision of bus shelters in the city (e.g., minimum accommodations) 	<p>Consistent. The project does not include any mobility or transit-related improvements, so the actions of this policy related to implementing these types of projects or plans would not apply. However, the project site is 3,000 feet north of Otay Mesa Road, which has existing bus routes between SR-125 and the Iris Avenue transit station and Class II bike lanes between SR 125 and Ocean Hills Parkway (Nearmap 2024). SANDAG also identifies the stretch of Otay Mesa Road generally between SR-125 and Ocean View Hills Parkway for future transit improvements, including bike facilities and a rapid bus route (SANDAG 2024). The project does not include a development project at this time, but a future development project would construct non-contiguous sidewalk to provide pedestrian access to these transit routes.</p>

Table 12

General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>with a priority in Communities of Concern.</p> <p>Supporting Actions</p> <ul style="list-style-type: none"> • Identify transit stops where upgrades are needed, especially in Communities of Concern, and streamline implementation of upgrades to high priority transit stops. • Facilitate partnerships with universities and colleges with goal of student walk/ride/transit use well-above citywide goals. • Prioritize and assist MTS with siting and design of complete transit stops in Communities of Concern, including shade trees, lighting, trash bins. • Create programs and incentives for transit passes bundled with all new major developments within one mile of a major transit stop. • Partner with MTS for priority right of way for buses and trolley in roadway corridors and at intersection. • Support MTS, SANDAG and Caltrans in the creation of transit right of way for regional transit connections. 	
<p>Measure 3.3: Work from Anywhere</p> <p>Supporting Actions</p> <ul style="list-style-type: none"> • Stand up public Wi-Fi access at City libraries, recreation facilities and various public areas in Low-to-Moderate Income (LMI) areas. • Formalize a regional device refurbishment and distribution program. • Continue to operate a program to loan mobile hotspots and personal computers to residents. • Create a Digital Navigator support line to assist with basic technology issues and provide guidance on low income technology options. 	<p>Not applicable. The City is responsible for developing policies, programs, and public facility improvements to Wi-Fi; therefore, those components of this measure is not applicable to the project. The project would not prevent implementation of this policy. A future development project built in accordance with the proposed zoning would provide connections to communication systems for telephone, telecom, computers, and cable television to the Specific Plan area, supporting City implementation of this measure.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<ul style="list-style-type: none"> • Create a Digital Literacy program to educate residents, particularly in low-to moderate income (LMI) areas. • Work with local organizations to distribute refurbished devices previously used by the City to residents at low or no costs. • Improve and expand data gather and public outreach in Communities of Concern to understand which residents need the most assistance to technology options, what the barriers are to remote work, and improve community's ability to access technology. 	
<p>Measure 3.4: Reduce Traffic Congestion to Improve Air Quality</p> <p>Actions</p> <ul style="list-style-type: none"> • Install traffic circles and roundabouts. • Retime traffic signals to reduce vehicle fuel consumption through improving the flow of traffic. 2030 Target Install 13 new roundabouts 2030 GHG Reduction (MT CO2e) 1,519 2035 Target Install 20 new roundabouts 2035 GHG Reduction (MT CO2e) 2,037 Supporting Actions • Work with the Port District, SANDAG and Caltrans to prepare a feasibility study to identify the best truck route to Tenth Avenue Marine Terminal and diversion, traffic calming and appropriate signage as included in the APCD's Community Emission Reduction Plan (CERP). • Work with communities to implement comprehensive solutions for the curb space, including implementation of timed parking, establishment of parking districts, and programming of the curb space for deliveries, ADA access and other passenger loading, and micro-mobility. 	<p>Consistent. Several components of this measure are not applicable to the project, as they are the City's responsibility. Additionally, the project is a rezoning project and does not propose development at this time. However, a future development project would not prevent the implementation of traffic-calming projects (e.g., traffic circles or roundabouts) that would reduce GHG emissions from vehicular traffic.</p>

**Table 12
General Plan and CAP Strategy Consistency Analysis**

Policy Language	Consistency Discussion
<p>Measure 3.5: Climate-Focused Land Use Actions</p> <ul style="list-style-type: none"> Focus new development in areas that will allow residents, employees and visitors to safely, conveniently and enjoyably travel as a pedestrian, or by biking, or transit, such as in Transit Priority Areas (TPAs), and areas of the city with the lowest amount of vehicular travel. Plan for land uses that will allow existing residents, employees and visitors to more safely, conveniently and enjoyably travel as a pedestrian, by walking, biking, or transit. Update the placemaking ordinance to better support mode shift, to increase accessibility, walkability, and activate public spaces. 2030 Target 8% VMT (commuter and non-commuter) reduction per capita 2030 GHG Reduction (MT CO2e) 341,724 2035 Target 15% VMT (commuter and non-commuter) reduction per capita 2035 GHG Reduction (MT CO2e) 605,185 <p>Supporting Actions</p> <ul style="list-style-type: none"> Focus on delivering new mixed-use development on sites, including vacant and underutilized lots, located near transit, such as in TPAs and areas of the city with the lowest amount of vehicular travel. Implement active transportation in lieu fees to fund pedestrian, cyclist and transit investments where the greatest GHG emissions reductions will result, in accordance with Complete Communities: Mobility Choices. Amend local regulations, like the Placemaking ordinance, and policies to allow for wider sidewalks and the use of setbacks for public spaces and place making. 	<p>Consistent. While not currently in a designated TPA, the project site is near existing and proposed bike and bus lines on Otay Mesa Road as described under the discussion for Measure 3.2 above. This would provide opportunities for future employees to use alternative forms of transportation when traveling to and from potential industrial uses of the site. While the project does not propose the development of the project site, a future development project would construct the extension of Vista Santo Domingo from its existing terminus north of the project site and would connect to Exposition Way to the south. The proposed two-lane collector road would be built in accordance with the City's roadway standards, and the existing pedestrian sidewalks along Exposition Way would be extended throughout the length of the roadway (City of San Diego 2014) by the future development. This would improve the safety and circulation of this area, and it would allow any future employees to make use of the bus and bike improvements along Otay Mesa Road identified in the SANDAG Regional Plan (see discussion for Measure 3.2 above).</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<ul style="list-style-type: none"> • Implement temporary and permanent car-free zones/zero emission zones. • Maximize new development in areas located with safe, convenient, and enjoyable access to transit. • Support expansion of urban greenspace including park access, open space, and wildlife corridors where appropriate, along streets to encourage outdoor activity, walking, and increase pedestrian access to parks in Communities of Concern. • Amend the General Plan Mobility Element to include a Complete Streets policy to enable safe, attractive and comfortable access so that pedestrians, bicyclists, motorists and transit users of all ages and abilities can safely travel within the public right of way. • Amend land development code regulations to require more efficient pedestrian access between existing and new development (e.g., between adjacent lots). • Prioritize as part of the Environmental Justice Element work on air quality emissions reduction opportunities with APCD and Communities of Concern. 	
<p>Measure 3.6: Vehicle Management Optimize use of curb space including management of on-street parking in TPAs.</p> <ul style="list-style-type: none"> • Amend the land development code to eliminate parking minimum requirements. • Amend the land development code to establish parking maximum requirements for use types and locations where appropriate. • Amend the land development code to prohibit new auto-oriented land uses that would create conflicts with walking and bicycling within TPAs. 	<p>Not applicable. The project site is not within a TPA, and it is the City's responsibility to amend the land development code.</p>

Table 12	
General Plan and CAP Strategy Consistency Analysis	
Policy Language	Consistency Discussion
<p>Strategy 4: Circular Economy & Clean Communities This strategy maintains a 90% waste diversion rate, as well as methane capture from our landfill and wastewater treatment facilities. It also includes actions to increase healthy food access and food recovery.</p>	
<p>Measure 4.1: Changes to the Waste System Actions</p> <ul style="list-style-type: none"> • Approve and implement the Polystyrene Foam and Single Use Plastics Ordinance, pending Environmental Impact Report. • Expand the Polystyrene Foam and Single Use Plastics Ordinance to phase-out single-use materials and prioritize reuse rather than disposable goods. 	<p>Not applicable. The City is responsible for amending the land development code. Once the City adopts new regulations to ban polystyrene foam and single use plastics, the regulations would apply to any future development project.</p>
<p>Measure 4.2: Municipal Waste Reduction Capture landfill methane gas emissions.</p> <ul style="list-style-type: none"> • Through an update to the City's administrative regulations include purchasing requirements for sustainable products and food whenever option is available. <ul style="list-style-type: none"> ○ Reduce GHG emissions and water use of total beef, pork, chicken, turkey and dairy purchases by 20%. ○ Increase local, healthy, and sustainable foods to 20% of total food purchases prioritizing locally sourced, valued workforce and animal welfare • Include procurement targets, with a focus on the maintenance of street easements, parks, and other green spaces, for purchasing compost through the Miramar Greenery or other local composting facilities to expand the demand and production of high quality compost in the city. 	<p>Not applicable. The project does not include landfill operations, and the City is responsible for updates to administrative regulations and City policies.</p>
<p>Measure 4.3: Local Food Systems & Food Recovery Actions</p> <ul style="list-style-type: none"> • Create a food council or advisory board with local stakeholders. 	<p>Not applicable. The City is responsible for these regional efforts and regulations. The project would not prevent implementation of the various programs supporting access to local food programs detailed in this measure.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<ul style="list-style-type: none"> • Invest in expanding the food waste prevention network - expand infrastructure & partnerships for edible food recovery. • Require food waste prevention, donation and recycling plans for all City food service operations and large events on City managed, leased or owned lands. • Establish a multidisciplinary team of subject matter experts across City departments with a focus on land use, economic growth, neighborhood vitality and healthy food access to work with community members to expand urban agricultural programs and develop policies to encourage community based farms, including demonstration projects. <p>Supporting Actions</p> <ul style="list-style-type: none"> • Working with the County and Farm Bureau to support investments in climate smart agriculture and local food supply chain. • Partner with County of SD to increase community access to Federal meal programs (EBT, WIC, etc.) and incentivize usage of these programs for local food access (CSA, farmers market, retail). • Incorporate food security and resilient local food systems into climate resilience and emergency planning. • Invest in a network of local food sourcing, aggregation, distribution and processing infrastructure including regional food hubs, neighborhood scale commercial kitchens or shared kitchens, and other food businesses, particularly in low-income communities. • Regulate or activate programs for food businesses to minimize food related carbon emissions including requiring 	

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>food waste prevention, donation and recycling plans for businesses/institutions (for Tier 1 and Tier 2 generators outlined in SB1383) and provide technical assistance and resources. Also include checklist and outreach as part of business licensing process.</p> <ul style="list-style-type: none"> • Incentivize incorporation of urban agriculture features including indoor agriculture, edible forestry, community gardens, etc. • Increase community participation with Urban Agriculture Incentive Zone (UAIZ) program. 	
<p>Measure 4.4: Zero Waste to Landfill Actions</p> <ul style="list-style-type: none"> • Update, adopt and implement the Zero Waste Plan. • Create a community reuse and repair program to increase waste diversion, reduce material consumption and develop training and learning opportunities. • Update the Citywide Recycling Ordinance to ban divertible materials (yard waste, food) from residential and commercial trash containers, in compliance with SB 1383. • Develop a marketing plan for compost and mulch developed within the city. Identify and target compost and mulch markets in urban areas as well as urban agriculture. Partner with industries to increase compost and mulch use including landscaping, stormwater and water conservation. • Analyze city regulations and other barriers to developing businesses that reuse or repair consumer goods, where doing so will not adversely impact the surrounding residential neighborhood. 	<p>Not applicable. The City is responsible for these regional efforts and regulations. However, it is noted that a future development project built in accordance with the proposed rezoning project would prepare a Waste Management Plan to identify measures to reduce and recycle construction and demolition waste. The project would not prevent the City from implementing programs referenced in this measure.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<ul style="list-style-type: none"> • Increase public awareness of and access to opportunities for reuse, product rentals, repair, and donation. • Support and expand citywide reuse infrastructure. • Supporting Actions • Support community composting enterprises through strategic partnerships. • Increase enforcement presence to ensure compliance with recently modified City Recycling Ordinance and increase waste diversion. • Evaluate and provide input on State and Federal producer responsibility requirements and laws, to focus on hard to recycle and/or hazardous items impacting San Diego's waste stream. • Implement a public mattress recycling drop-off location. • Partner with franchise waste haulers to address barriers to increasing diversion rates. • Continue and enhance public outreach programming that provides residents with strategies for household waste reduction, including from food waste and shipping and packaging (e.g., on-demand deliveries), including outreach in languages that reflect the diverse needs of San Diego. • Amend the Construction & Demolition regulations to establish a deconstruction requirement to reduce demolition waste from construction and renovation, facilitate material reuse and create jobs 	
<p>Measure 4.5: Capture Methane from Wastewater Treatment Facilities</p>	<p>Not applicable. The City is responsible for wastewater treatment facilities and no wastewater treatment facility is proposed as a part of the project. The project would not prevent the city from implementing methane capture at wastewater treatment plants.</p>

**Table 12
General Plan and CAP Strategy Consistency Analysis**

Policy Language	Consistency Discussion
<p>Strategy 5: Resilient Infrastructure This strategy will help the City thrive in the face of the impacts of climate change through a greater focus on the greening of our City, starting with our Communities of Concern. It also includes targets for the restoration of salt marshland for sequestration and increasing our local water supply through Pure Water San Diego.</p>	
<p>Measure 5.1 Sequestration</p> <p>Actions</p> <ul style="list-style-type: none"> • Protect, restore and enhance urban canyons. Support habitat restoration of urban canyons, inclusion of environmental education and recreation opportunities, and continued preservation. • Develop an area specific management plan to protect, restore and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. • Develop Natural Resource Management Plans on all managed preserved lands and include in plans the sequestration as the information becomes available <p>Supporting Actions</p> <ul style="list-style-type: none"> • Prioritize partnerships with San Diego's tribes and restorative environmental justice opportunities on wetland restoration projects. • Acquire Open Space Conservation Land. • Create a pilot carbon farming program on vacant public land or in partnership with educational institutions and non-profit organizations. • Partner with the San Diego River Conservancy and other agencies to identify sequestration opportunities through restoration projects. 	<p>Not Applicable. The project site is not a canyon, wetland, or otherwise protected open space area. While the project site is currently undeveloped, it is currently zoned for RM-2-4, and it does not contain any ESL. The project would rezone the site to IL-1-1.</p>
<p>Measure 5.2: Tree Canopy</p> <p>Actions</p> <ul style="list-style-type: none"> • Increase tree planting in Communities of Concern starting with the planting of 	<p>Consistent. The City is responsible for the City-wide and regulatory components of this measure. As discussed under the consistency analysis for General Plan Policies CE-J.2 and CE-J.3, any future project would need to</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>40K new trees in these communities by 2030.</p> <ul style="list-style-type: none"> • Create a Street Tree Master Plan with a target of planting 100,000 trees by 2035. Within the Street Tree Master Plan, identify City lands and spaces that need trees and identify ways to increase permeable areas for new trees, focused in Communities of Concern. • Conduct a new Urban Tree Canopy assessment utilizing light detection and ranging (LiDAR) technology to identify areas in need of additional tree canopy. • Increase tree planting in Communities of Concern by identifying city lands/spaces that need trees. • Develop a plan to increase permeable areas for new trees and restore spaces that have been paved, focused in Communities of Concern. • Support expansion of urban tree canopy in parks and along active transportation network. Prioritize implementation in Communities of Concern. • Develop policies that encourage and incentivize developers, homeowner associations, and other organizations to preserve, maintain and plant trees. • Reform, streamline, and expand the No Fee Street Tree program to remove barriers that exist which detour or prohibit participation by residents within Communities of Concern. • Protect and maintain all healthy City trees that have minimal conflicts to existing and future infrastructure, by use of policy, code, public outreach and code enforcement. 	<p>demonstrate consistency with the Otay Mesa Street Tree Plan , which is referenced as Policy 2.1-2(s) of the OMCP and included as Appendix B of the OMCP (City of San Diego 2014). Otay Mesa Community Plan Street Tree List provides guidance for types of trees to be planted in different neighborhoods and districts. Street tree planting installations require approval by the City of San Diego’s Urban Forester. All plant materials are required to be consistent with the standards of the Land Development Code Landscape Standards.</p>

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>Supporting Actions</p> <ul style="list-style-type: none"> • Amend the Land Development Code to increase landscape and parking lot tree planting requirements. • Streamline permitting for tree planting, dedicate resources to planting in nontraditional street tree locations, and provide reduced fees or fee waivers in Communities of Concern. • Revise Council Policies and Municipal Codes to strengthen tree protection and enhance tree planting efforts. • Increase irrigation for trees in Parks and in Street rights-of-way • Implement a citywide protocol for tracking planted, removed and maintained street trees. • Explore allocating revenue from tree removal fines, including from the placement of utility equipment located in the right of way, and fees to fund the planting of new trees. • Expand volunteer programs and partnerships with community organizations to plant and maintain trees. • Support the creation of new urban green space along freeways and city right of way. • Ensure the diversification of tree species, including using native tree and shrub species and/or species that are adapted to higher temperatures and require less water. • As established in the Energy Cooperation Agreement with the City and SDG&E, implement the Right Tree, Right Place program (or successor programs), identify additional tree planting locations, assist with tree species ideas, and provide technical support through SDG&E's arborists. • Monitor and report on SDG&E's plans to supplant the City's efforts with direct 	

Table 12
General Plan and CAP Strategy Consistency Analysis

Policy Language	Consistency Discussion
<p>in-community charitable support for planting up to 2,500 trees in the city over 10 years.</p> <ul style="list-style-type: none"> • Perform proper tree maintenance and tree removal to promote a healthy urban forest and safety of trees in public spaces. • Redesign hardscape infrastructure around existing City trees when possible in order to increase large tree canopy cover. 	
<p>Measure 5.3: Local Water Supply Expand awareness of the City’s Rainwater Harvesting Rebates and Grass Replacement Rebates programs to increase participation in the programs and facilitate accessibility to residents across the City, prioritizing those within Communities of Concern and areas that have had historically lower participation in the programs.</p> <ul style="list-style-type: none"> • Advance undergrounding of utilities to provide a means to reduce energy use, increase green space preservation, sustainably process and store water and wastes, securely and efficiently site critical infrastructure, prevent and reverse degradation of the urban environment, and enhance quality of life. • Maximize planning and implementation of green infrastructure at watershed scale and site specific with focused stakeholder engagement efforts in Communities of Concern. • Investigate opportunities to capture and reuse rainwater. • Implement Waterways Restoration projects. • Increase opportunities for stormwater harvesting by evaluating new harvesting methodology to determine viability. 	<p>Not applicable. The City is responsible for rebate programs, local water supply, City parking lots, and associated regulations. Implementation of the project would not prevent City implementation of programs to increase local water supply.</p>

Table 12	
General Plan and CAP Strategy Consistency Analysis	
Policy Language	Consistency Discussion
<ul style="list-style-type: none"> Amend building code regulations to require a percentage of all non-roof (e.g., hardscape) surfaces around new buildings meet certain criteria to reduce urban heat island effect. Install cool pavement material on City parking lots and in the public right-of-way, prioritizing Communities of Concern, to increase building energy efficiency and reduce urban heat island effect. 	
<p>Strategy 6: Emerging Climate Actions This strategy will help the City thrive in the face of the impacts of climate change through a greater focus on the greening of our City, starting with our Communities of Concern. It also includes targets for the restoration of salt marshland for sequestration and increasing our local water supply through Pure Water San Diego.</p>	
<p>Measure 6.1: Explore further opportunities to achieve net zero GHG emissions</p> <p>Supporting Actions</p> <ul style="list-style-type: none"> Explore policies and incentive programs to electrify construction equipment Build programs and partnerships to recognize and incentivize business practices that align and implement the CAP strategies and measures. Identify opportunities to improve city processes to facilitate faster deployment of technologies and practices in San Diego. Investigate advanced air quality control systems, including GHG removal technologies and criteria pollutant control technologies. Exploring the use of GHG emission offsets which can include techniques such as increasing carbon sequestration in soils, forests and farmland, purchasing clean electricity credits from neighboring states, or through emerging technological approaches such as the direct capture and removal of carbon from the atmosphere. 	<p>Not applicable. The City is responsible for programs, regulations, and policies related to achieving net zero. Future development of the project site would be required to comply with the latest City regulations in effect at the time of building permits including any future regulations that are enacted to achieve net zero emissions. The project would not conflict with this measure as it would not prevent the City from exploring future opportunities to achieve net zero emissions.</p>

Table 12 General Plan and CAP Strategy Consistency Analysis	
Policy Language	Consistency Discussion
<ul style="list-style-type: none"> • Participate in research around regional and/or local benefitting offset programs that ensure the benefits of investments are prioritized in the City's Communities of Concern. • Continue to engage on the development of research and data around the sequestration potential of various types of natural spaces including blue carbon sequestration, more specifically develop a citywide sequestration standard for wetlands restoration. • Support partners such as tribal governments and universities to restore salt marshes and wetlands ecosystems for sequestration. • As it pertains to GHG avoidance, the City's CAP Implementation Plan will focus and prioritize the core benefit of air quality to support the shared regional efforts to address nonattainment and improve air quality equitably. • Advocate for APCD to develop CERP-like plans in all communities. • Support the regional efforts to address nonattainment, toxic air contaminants in Communities of Concern. 	

CAP Consistency Regulations

Step 1 involves evaluating whether the project is consistent with the growth projections used in the development of the CAP. As discussed, although no development is proposed at this time, the project includes a GPA and CPA to redesignate the land use from Residential-Medium to Light Industrial and a Rezone from the Residential Medium (RM-2-4) zone to the Light Industrial (IL-1-1) zone. The project is therefore not consistent with the existing land use and zoning designations. The project site is not located within a TPA; therefore, the increase in density would not be located within a TPA. Finally, the proposed development would result in densities that are more intensive than existing assumptions for the site. Therefore, the project would not be consistent with the growth projections and associated GHG emission assumptions used in the development of the CAP.

Regardless, future development would be required to implement measures in accordance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14.

Mobility and Land Use Regulations (SDMC Section 143.1410)

The Mobility and Land Use Regulations section of the CAP Consistency Regulations require the following improvements to be provided by future development.

Street Shading. This provision of the CAP Consistency Regulations requires projects to provide shading of at least 50 percent of the Throughway Zone through either trees and/or a combination of trees and structures for premises that contains a street yard or abuts a public right of way with a Furnishings Zone. These regulations would apply to the project frontage along Vista Santa Domingo. This requirement would not be required at this time but would be demonstrated on future development's landscape plans prior to future project approval.

Pedestrian Amenities. The regulations require at least one pedestrian amenity for every 250 feet of linear feet of street frontage (e.g., trash and recycling receptacles, seating, lighting, public artwork, wayfinding signs, transit stop enhancement). This requirement would not be required at this time but would be demonstrated on future development's building plans prior to future project approval.

Bicycle Charging. The regulations require at least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 to be supplied with individual outlets for electric charging at each bicycle parking space. This requirement would not be required at this time but would be demonstrated on future development's building plans prior to future project approval.

Resilient Infrastructure and Healthy Ecosystems Regulations (SDMC Section 143.1415)

The Resilient Infrastructure and Healthy Ecosystems Regulations requires two trees to be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises. If the required trees cannot be provided on-site, they can either be provided off-site or the Urban Tree Canopy Fee can be paid. This requirement would not be required at this time but would be demonstrated on future development's landscape plans prior to future project approval.

Conclusions

As with the OMCP FEIR, GHG impacts associated with the project would remain significance and unavoidable. Although the project would result in GHG emissions that are greater than those associated with the existing land use and zoning designation, the level of increase is not considered substantial because of policies and regulations that have been implemented since adoption of the OMCP FEIR. Future development would be constructed in accordance with 2022 Title 24 which would require increased energy efficiency and the installation of EV infrastructure, and future development would be required to implement the CAP Consistency Regulations provided in SDMC Chapter 14, Article 3, Division 14. Project consistency with these policies that were adopted subsequent to adoption of the OMCP Final EIR would reduce GHG emissions compared to previous assumptions.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the OMCP FEIR. The project would not result in any new significant impacts, nor would a substantial increase in the severity of impacts from that described in the OMCP FEIR.

VI. ISSUES NOT ANALYZED IN THE PREVIOUS EIR

CEQA Guidelines, Section 15128, allows environmental issues for which there is no likelihood of a significant impact to not be discussed in detail or analyzed further in the EIR. The certified OMCP FEIR provided a similar level of analysis, even for those issue areas considered to result in impacts found not to be significant.

The City has determined that the current project, subject of and evaluated under this Addendum, would not have the potential to cause significant impacts to those issue areas beyond those analyzed. There is no new information available that would indicate that the project would result in new significant impacts.

VII. SIGNIFICANT UNMITIGATED IMPACTS

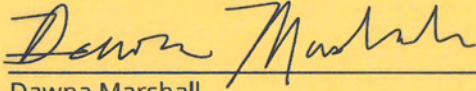
The OMCP FEIR indicated that significant impacts to the following issue areas would be substantially lessened or avoided if all the proposed mitigation measures recommended in the OMCP FEIR were implemented: land use; biological resources; historical resources; human health/public safety/hazardous materials; hydrology/water quality; geology/soils; and paleontological resources. The OMCP FEIR further concluded that significant impacts related to air quality, noise, utilities, and GHG emissions would not be fully mitigated to below a level of significance and would remain significant and unavoidable. With respect to cumulative impacts, implementation of the OMCP FEIR would result in significant impacts related to air quality, noise, traffic/circulation (horizon year), utilities (solid waste), agricultural resources, and GHG emissions, which would remain significant and unavoidable.

Because there were significant unmitigated impacts associated with the certified OMCP FEIR, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the respective Program EIRs, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified OMCP FEIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

The proposed project would not result in any additional significant impacts nor would it result in an increase in the severity of impacts from that described in the previously certified OMCP FEIR.

VIII. CERTIFICATION

Copies of the addendum, the certified OMCP FEIR, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at <https://www.sandiego.gov/ceqa/final>.



Dawna Marshall
Senior Planner
Development Services Department

January 14, 2025

Date of Final Report

Analyst: Morgan Dresser

Attachments:

- Figure 1: Regional Location
- Figure 2: Aerial View
- Figure 3: Project Site and Surrounding Zoning
- Figure 4: Brown Field Airport Influence Area
- Figure 5: Brown Field Safety Compatibility Map
- Figure 6: Brown Field Noise Contour Map

Appendices:

- Appendix A: Air Quality and Greenhouse Gas Emission Modeling (CalEEMod)

REFERENCES

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Nearmap

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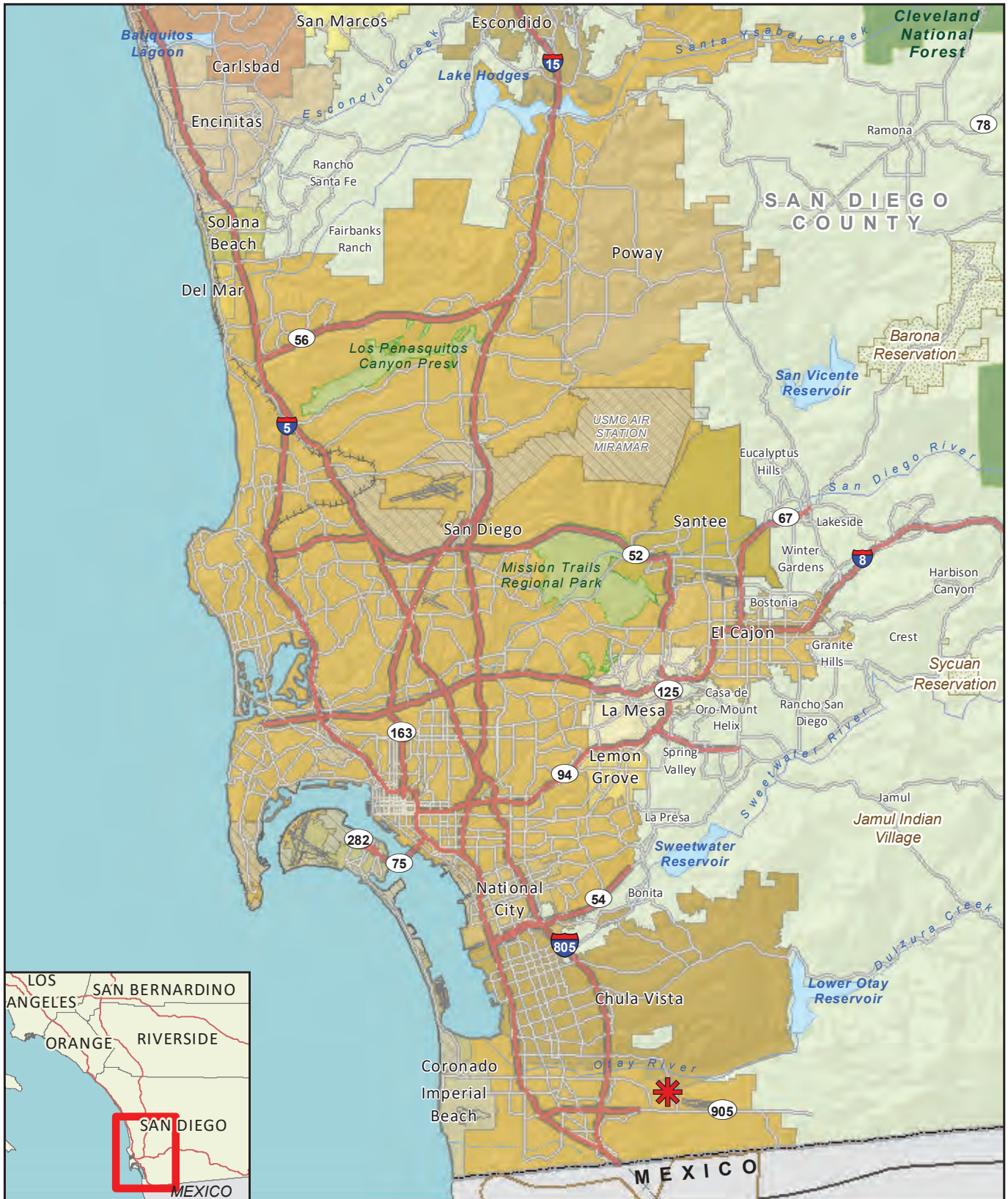
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 Project Location

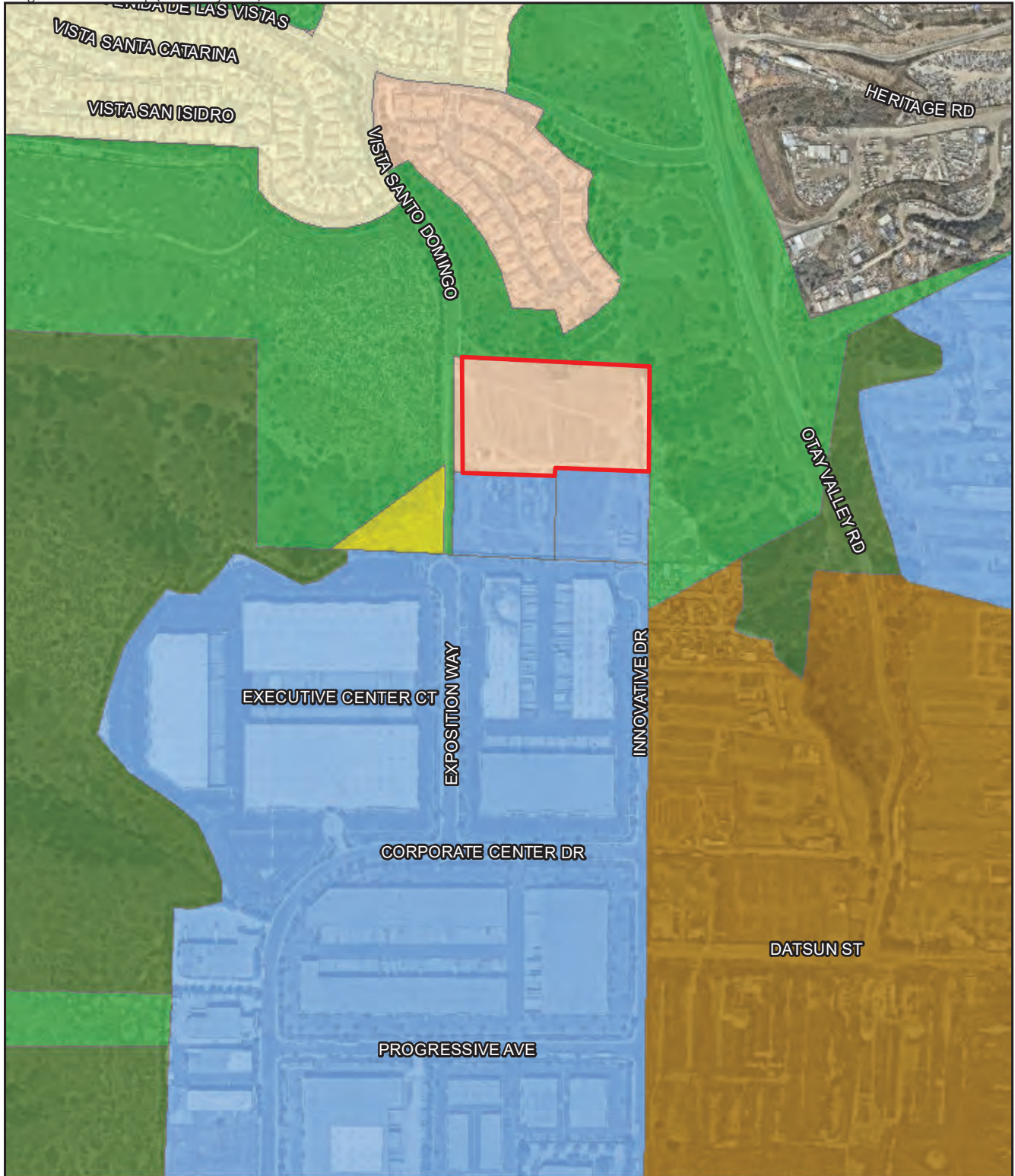
FIGURE 1
Regional Location



 Project Boundary

FIGURE 2
Aerial View

Image Source: NearMap (flown May 2023)



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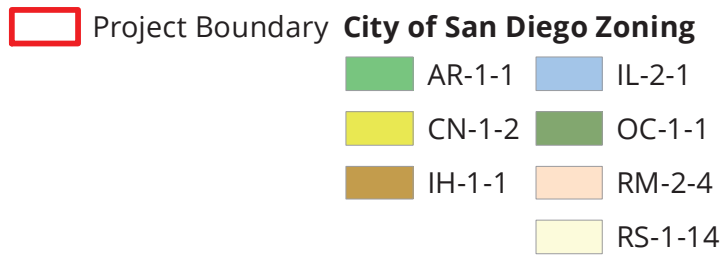


FIGURE 3
Project Site and Surrounding Zoning



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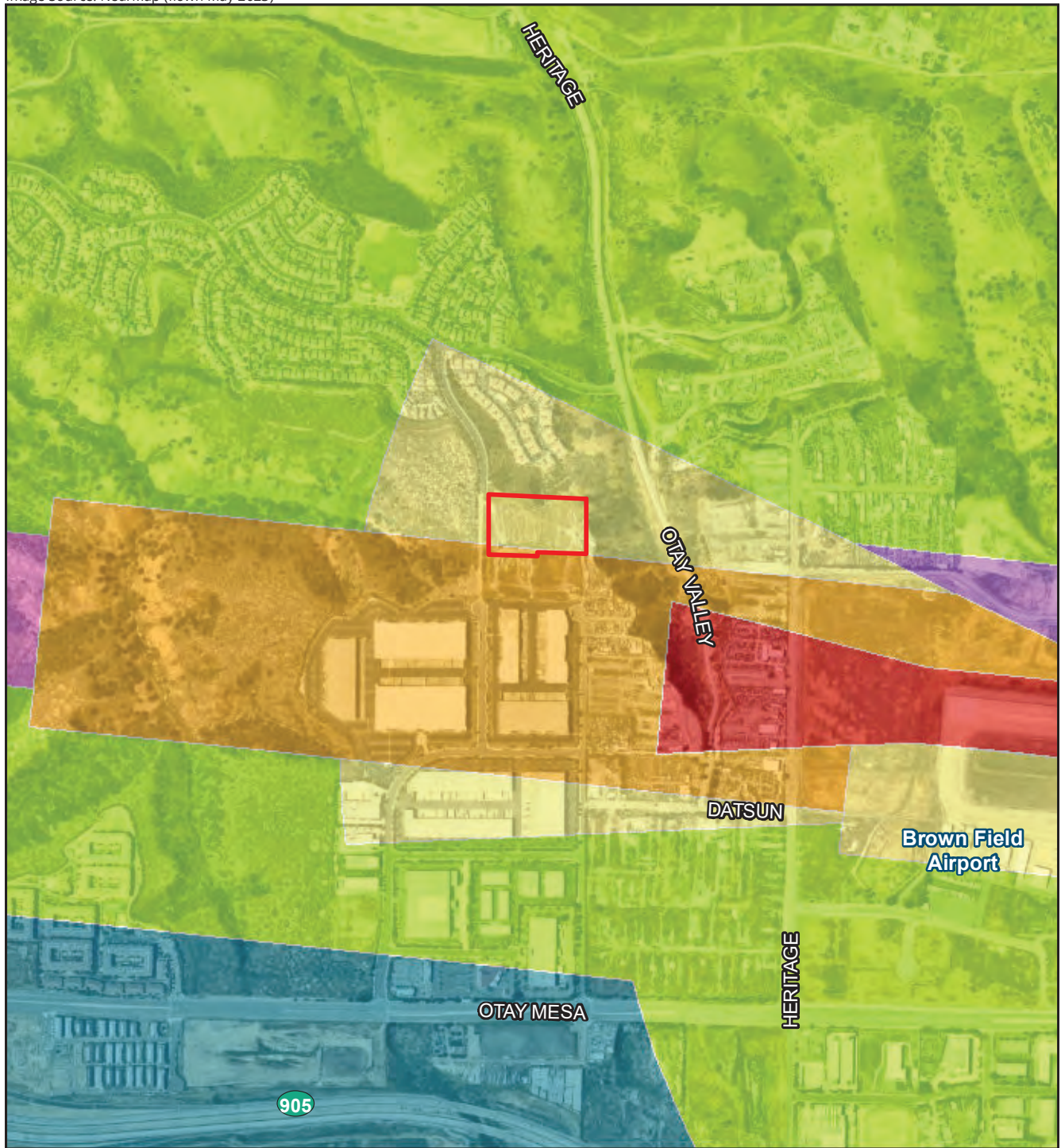


 Project Boundary **Airport Influence Area**

 Review Area 1

 Review Area 2

FIGURE 4
Brown Field Airport Influence Area



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 Project Boundary

Safety Zones








-  Zone 1 - Runway Protection Zone
-  Zone 2 - Inner Approach/Departure Zone
-  Zone 3 - Inner Turning Zone
-  Zone 6 - Traffic Pattern Zone
-  Outer Safety Zone
-  Sideline Zone; primarily on airport property
-  Airport Influence Area 2

FIGURE 5
Brown Field Safety Compatibility Map



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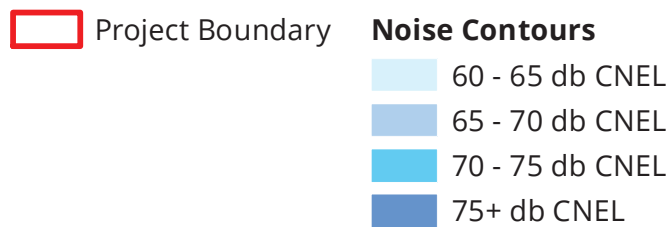


FIGURE 6
Brown Field Safety Compatibility Map